

Response to Submissions

Slieveacurry Renewable
Energy Development, Co.
Clare

An Coimisiún Pleanála Ref. No:
PAX03.324270



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EXECUTIVE SUMMARY

MKO have been instructed by Slieveacurry Ltd. to prepare this Response to Submissions, having been invited to respond by An Coimisiún Pleanála. The request was made in relation to the Strategic Infrastructure Development (SID) planning application before the Commission for consideration (ACP Ref. ACP-324270-26), concerning the proposed development of 9 no. turbines and all associated infrastructure in the townland of Glendine North and adjacent townlands, County Clare.

MKO considers that the application documentation, Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and accompanying documentation provide a comprehensive and robust basis for the Commission to undertake an adequate assessment of the Proposed Project. The Proposed Project has been informed by extensive multi-disciplinary surveys over several years, including numerous ground investigations, ecological and ornithological surveys which have informed both the design and assessment of the Proposed Project and the conclusions of the EIAR and NIS. Having reviewed the submissions raised, MKO do not consider that there are any deficiencies identified in relation to the survey data, methodologies or assessments carried out, which would alter the conclusions presented in the EIAR and NIS.

Section 3 of this response addresses submissions received from Statutory Consultees, who were identified as prescribed bodies during the planning process, and notified of the Proposed Project. The matters raised by Statutory Consultees identify a range of topics and it is not considered that any significant concerns have been raised that have not already been wholly addressed within the application documentation, EIAR, NIS, and accompanying documentation. Many of the observations raised relate to standard conditions (many of which are already reflected in the EIAR) that could be implemented by the Commission, in the event that planning permission is granted.

Section 4 of this response addresses submissions received from Third-Party Observers. The matters raised by Third-Party Observers have been categorised under relevant themes, and a comprehensive response to each theme raised by Third Party Observers is addressed in full.

The Proposed Project represents a strategically important renewable energy development that will make a substantial contribution to Ireland's energy security, renewable and climate objectives. In exercising its functions under the Climate Act, the Commission is required, insofar as practicable, to perform its functions in a manner consistent with the requirements of Section 15(1) of the Climate Act, including the furtherance of the national climate objective of 9GW of wind energy by 2030 and a renewable electricity share of 80% by 2030.

In addition, the Proposed Project will deliver a range of benefits including, supporting the transition to a low carbon climate resilient society, provide clean renewable energy to the national grid, helping to moderate energy costs over the long term, delivering a long-term positive impact on climate through the displacement of fossil fuel based energy generation and providing a significant positive benefit to the local community through the creation of sustainable local employment and the provision of a local Community Benefit Fund. It remains our view that the Proposed Project should receive a grant of permission from the Commission, as there are no valid planning reasons which would warrant its refusal.

1.

INTRODUCTION

MKO have been instructed by Slieveacurry Ltd. ('the Applicant') to prepare this Response to Submissions to the SID application (ACP Ref. ACP-324270-26), having been invited to respond to the same by An Coimisiún Pleanála ('ACP', the 'Commission') on 7th July, 23rd July and 31st of July 2026. The initial letter from the Commission stated that a response on the submissions received in relation to the application, including those from Statutory Consultees and Third-Party Observers, should be submitted by 4th August 2026. Subsequently, a further two letters were issued by the Commission inviting the Applicant to respond to submissions made by Clare County Council and Transport Infrastructure Ireland. In the interest of brevity, MKO agreed with the Commission that a single response would be submitted in response to both letters, with the combined response to submissions to be submitted by Friday 21st August 2026.

For ease of reference, the following terminology is used throughout this document, as reproduced from Chapter 1, Section 1.1.2, of the EIAR:

- Where the '**Proposed Project**' is referred to, this encompasses the entirety of the project for the purposes of this EIA in accordance with the EIA Directive. The Proposed Project is described in detail in Chapter 4: Description of the Proposed Project.
- Where the '**Site**' is referred to, this relates to the primary study area for the EIAR, as delineated by the EIAR Site Boundary in green as shown on Figure 1-1 of the EIAR and encompasses an area of approximately 1,260 hectares.
- Where the '**Proposed Grid Connection Site**' is referred to, this refers to the part of the Site containing the proposed extension to the existing 110kV Slievecallan substation at and the 33kV underground cabling connection from the wind farm road to the proposed substation extension.
- Where the '**Proposed Wind Farm Site**' is referred to, this refers to the portion of the Site containing the proposed turbines and ancillary infrastructure, excluding the Proposed Grid Connection Site.
- The '**Proposed Turbines**' refers to the 9 no. turbines associated with the Proposed Wind Farm Site as outlined above.
- Where the '**Proposed Enhancement Site**' is referred to, this refers to the portion of the Site containing the proposed biodiversity and ornithology enhancement and management areas, excluding the Proposed Wind Farm Site and Proposed Grid Connection Site.

1.1

Completeness, Quality and Adequacy of the Planning Application Documentation

MKO can only comment on the scope, quality and adequacy of the documentation submitted as part of this application and wishes to reaffirm that the EIAR, NIS and planning application submitted to the Commission are comprehensive and robust and are of a standard that enables the Commission to fulfil its role as the competent authority in assessing the Proposed Project. MKO note that the Commission, in correspondence dated 10th June 2026, confirmed that the application was complete and contains all the information required to allow the application to be processed, in accordance with Section 37JA (a) of the Planning and Development Act 2000, as amended (the Act).

The Site is an extremely well-studied site and has been the subject of extensive multi-disciplinary surveys over several years, including numerous ground investigations, ecological and ornithological surveys. The findings of these surveys have informed both the design and assessment of the Proposed Project, as presented within the planning application documentation.

Based on the evidence collected and assessments carried out, MKO considers the Site to be appropriate for the Proposed Project. MKO acknowledges that submissions made on this application express an alternative view however in their professional capacity as expert planning and environmental consultants, MKO does not consider that submissions have identified any clear deficiencies in the survey data,

methodologies or assessments carried out which would alter the conclusions reached in the EIAR. Furthermore, it is considered that the observations have not provided an equivalent body of technical analysis, survey data or assessment evidence that supports alternative conclusions to those presented in the EIAR and therefore there is no credible alternatives that can be entertained by the Commission.

Notwithstanding the above, MKO acknowledges that concerns in relation to the Proposed Project have been raised in the submissions. MKO are confident that all concerns raised have been appropriately considered and addressed in the EIAR. This Response to Submissions document reiterates the relevant findings of the EIAR that address the concerns raised in the submissions.

1.2

Response Structure

This Response to Submissions includes individual responses to submissions made by Statutory Consultees followed by a response to Third-Party Observers.

This response is structured as follows:

- **Section 1** – Introduces the document and its structure,
- **Section 2** – Provides an overview of the legal position of the Proposed Project in relation to the Climate Action and Low Carbon Development Act 2015 (As Amended),
- **Section 3** – Response to Statutory Consultee Submissions in accordance with the Commission's request,
- **Section 4** – Response to Third-Party Submissions in accordance with the Commission's request,
- **Section 5** – Conclusion.

Appendix 1 provides a list of all Third-Party Observers and the submission themes that are relevant to each submission. In the interest of brevity, responses to submission themes are not repeated in the document.

2.

CLIMATE ACTION AND LOW CARBON DEVELOPMENT ACT 2015 (AS AMENDED)

A significant development in Irish planning law in relation to the obligations on public bodies in accordance with Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended (the Climate Act) is directly relevant to the determination of the Proposed Project.

The legal analysis of Section 15 of the Climate Act has arisen from a challenge to a decision of the Commission to refuse planning permission for a wind farm in County Laois. The Supreme Court issued a judgment on this matter on 4th February 2026 in *Coolglass Wind Farm Limited v An Coimisiún Pleanála* [2026] IESC 5.

The Climate Act establishes a legislative precedent to reduce Ireland's carbon emissions. The Climate Act legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade.

The Climate Act also incorporates the following key provisions:

- Embeds the process of setting binding and ambitious emissions-reductions targets in law;
- Provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Provides that the first two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- Strengthens the role of the Climate Change Advisory Council;
- Establishes that the government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations;
- Sets actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Establishes that Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

Section 15(1) below places an obligation on public bodies to perform their functions in a manner which favours climate action, unless it is objectively impracticable to do so.

“A relevant body shall, in so far as practicable, perform its functions in a manner consistent with:

- a) the most recent approved climate action plan,
- b) the most recent approved national long term climate action strategy,
- c) the most recent approved national adaptation framework and approved sectoral adaptation plans,
- d) the furtherance of the national climate objective, and
- e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.”

Significance of the Coolglass Judgment

The Supreme Court establishes that consenting authorities must make decisions ‘in so far as practicable’ in a manner ‘consistent with’ the approved national long term climate action strategy and the approved national long term climate action strategy as set out in Section 15(1) of the Climate Act. This means that

departure from climate objectives is permissible, but only where there are genuine practical difficulties that make full alignment impracticable.

Consenting Authorities, such as ACP, must therefore meaningfully engage with national climate objectives when exercising their functions, including decision-making and must also demonstrate how those functions have been carried out in a manner consistent with, in so far as practicable, national climate objectives.

Taking these legal duties into account, ACP is required to attribute significant weight to national climate policy and the delivery of renewable energy infrastructure, such as the Proposed Project, even where they materially contravene a statutory development plan, particularly when that plan is out of step with national policy.

The significance of the judgment is that Consenting Authorities, including ACP are now under clear, legal duty to give meaningful consideration of the contribution made to the achievement of national climate targets by renewable energy developments, such as the Proposed Project. This is of particular importance where a development would advance decarbonisation targets.

Relevance of the Proposed Project

The Proposed Project comprises of a renewable energy development, which will make a meaningful contribution to the fulfilment of national climate objectives, including those set out in the Climate Action Plan 2025 (CAP25), which sets out targets to achieve an 80% electricity share as well as 9GW of renewable energy by 2030.

Considering the Coolglass Supreme Court Judgment, ACP is required to attribute a significant weight to the following benefits in their assessment of the Proposed Project:

- The Proposed Project will contribute to compliance with Ireland's sectoral ceilings and Ireland's carbon budgets,
- It will generate renewable electricity and help to displace fossil-fuel based generation,
- It will further national climate objectives, including the CAP25 target of an 80% renewable electricity share as well as 9GW of renewable energy by 2030,
- It will support Ireland's legally binding commitments under national, European and International climate law.

Therefore, a decision to grant permission for the Proposed Project would represent the performance of ACP's functions in a manner that is consistent with Section 15(1) of the Climate Act.

Compliance with Section 15(1) of the Climate Act

Having regard to these functions, **Table 2-1** demonstrates how, in determining the application for the Proposed Project, ACP would be performing its functions in a manner consistent with Section 15(1) of the Climate Act.

Table 2-1 Proposed Project Compliance with the Climate Act

Section 15(1) Requirement	Proposed Project Compliance	Conclusion
a) Most recent approved climate action plan	The Proposed Project, which will contribute directly towards the CAP25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030. Onshore wind is identified as being critical in the decarbonisation of the electricity, and as such the Proposed Project should be considered in that regard. The Proposed Project will have an estimated installed capacity of approximately 54 MW. On this assumption, the Proposed Project will result in the net displacement of approximately 34,791 tonnes of carbon dioxide (CO₂) per annum.	A grant of permission would constitute the performance of ACP's functions in a manner consistent with CAP 25, insofar as is practicable.
b) Most recent approved national long term climate action strategy,	The Proposed Project will support the national long term climate action strategy as the development represents critical renewable energy infrastructure, that will make a meaningful contribution to achieving the State's reduced emissions targets and the transition towards a climate resilient society.	A grant of permission would constitute the performance of ACP's functions in a manner consistent with the most recent approved national long term climate action strategy, insofar as is practicable.
c) Most recent approved national adaptation framework and approved sectoral adaptation plans	The Proposed Project will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets. The electricity sector failed to remain within the designated sectoral ceiling of 20 Mt CO₂ eq for the first carbon budget period from 2020 to 2025. The delivery of renewable energy infrastructure such as the Proposed Project, which will result in the net displacement of approximately 34,791 tonnes of carbon dioxide (CO₂) per annum, is integral to the reduction of emissions from electricity generation and the transition towards a low carbon, climate resilient society. The national renewable energy targets and the carbon budgets are integral to the government's response to the climate crisis.	A grant of permission would constitute the performance of ACP's functions in a manner consistent with the most recent approved national adaptation framework and approved sectoral adaptation plans, insofar as is practicable.
d) the furtherance of the national climate objective	The Proposed Project, consisting of 9 no. wind turbines and associated infrastructure aligns with national climate policy objectives. The Proposed Project, with an estimated installed capacity of approximately 54 MW, will	A grant of permission would constitute the performance of ACP's functions in a manner

Section 15(1) Requirement	Proposed Project Compliance	Conclusion
	make a significant contribution to achieving the CAP 25 target of 9GW of onshore wind energy by the year 2030.	consistent with the furtherance of the national climate objective insofar as is practicable.
e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State	The Proposed Project will support the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State through the generation of wind energy and displacing electricity that would otherwise be produced from fossil fuel sources.	A grant of permission would constitute the performance of ACP's functions in a manner consistent with the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

The decision of the Supreme Court in *Coolglass Wind Farm Limited v An Coimisiún Pleanála* [2026] IESC 5 confirms that Section 15 of the Climate Act imposes a binding obligation on consenting authorities, including the Commission, to determine planning applications, insofar as practicable in a manner that is consistent with the fulfilment of national climate objectives and to give adequate reasons demonstrating that consistency.

The Proposed Project is supported by local, regional and national policy and has been designed in accordance with the latest national guidance and best practice. It is located in a strategic area for wind energy development, and it has also been demonstrated, in the EIAR and NIS, that the Proposed Project will not give rise to any significant adverse effect on the environment or on the integrity of European Sites.

Crucially, the Proposed Project will have an estimated installed capacity of 54 MW with the potential to displace approximately 34,791 tonnes of carbon dioxide (CO₂) per annum, making a significant contribution towards the CAP25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030.

Accordingly, the Commission can lawfully exercise its planning judgement to grant permission for the Proposed Project in a manner consistent with its statutory duty under Section 15 of the Climate Act and the principles clarified in *Coolglass Wind Farm Limited v An Coimisiún Pleanála* [2026] IESC 5, whilst also aligning with EU and national policy objectives.

3.

STATUTORY CONSULTEES

A total of five submissions were submitted to the Commission from Statutory Consultees. **Table 3-1** below identifies the Statutory Consultees who lodged a submission to the Commission in relation to the Proposed Project and who in the project team is responsible for the corresponding response.

Table 3-1 Statutory Consultees Submissions and Themes

Statutory Consultee	Themes Included	Lead Author for Response
Department of Defence	> Obstacle Lighting > Impact on Radar Systems	MKO Environment
Development Applications Unit	> Archaeology > Nature Conservation	MKO Environment & MKO Ornithology
Health Service Executive	> Public Consultation > Hydrology and Hydrogeology > Traffic Management and Road Safety > Emergency Medical Access > Noise and Vibration > Shadow Flicker > Residential Amenity and Complaints Management > Other Recommendations	MKO Environment
Transport Infrastructure Ireland	> Official Policy > National Road Network Maintenance and Safety > Proposed Turbine Component and Substation Component Delivery Route > Structures > Grid Connection Routing > Greenways	MKO Environment
Clare County Council	> Planning Policy > Visual Amenity > Residential Amenity > Traffic > Natural Heritage > Peat Management > Aviation Safety, Shannon Airport, Shanwick Air Routes and Cumulative Impact Concerns	MKO Planning, MKO Environment & MKO Landscape and Visual

3.1

Department of Defence

The Department of Defence (DoD) in its submission noted that the Air Corps were consulted in preparation of its response.

The DoD sets out the following conditions in the event that the Proposed Project is granted:

- All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. Obstacle lighting may be incandescent. If LED or other lighting types are used, should be a type visible to Night Vision equipment. Obstacle lighting must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light.
- In the event of negative impacts on future military radar systems, the owner will engage with the Department of Defence and will provide suitable mitigations as soon as practical.

Response

The Applicant acknowledges the aviation safeguarding conditions set out by the DoD and confirms that they are agreeable to these conditions, in the event that the Proposed Project is granted planning permission.

3.2 Development Applications Unit

The Development Applications Unit (DAU) made a submission on the planning application for the Proposed Project in relation to both Archaeology and Nature Conservation. These matters are addressed separately below.

3.2.1 Archaeology

The DAU note that previously unknown sub-surface archaeological features or deposits may be present within the Site and recommends that appropriate conditions relating to archaeological investigation, monitoring and mitigation are implemented by the Commission, in the event that planning permission is granted.

Response

The Applicant acknowledges that, as in most sites, sub-surface archaeological features or deposits may be present at the Site, and as such the conditions set out by the DAU with respect to Archaeology, which are consistent with the archaeological mitigation strategy set out in Chapter 14 of the EIAR, are agreeable to, in the event that the Proposed Project is granted planning permission.

3.2.2 Nature Conservation

The DAU make observations regarding the Appropriate Assessment (AA) and EIAR of the Proposed Project, particularly in relation to the assessment of hen harrier, survey methodologies and propose biodiversity management and enhancement measures.

Response

This section of the response relates primarily to ornithology and to a lesser extent biodiversity and herein sets out the response to the issues raised by the DAU. The response to this submission has been prepared by Principal Ornithologist, Padraig Cregg (B.Sc., M.Sc.) of MKO who prepared the scope of works and survey methodology for the submitted EIAR. He is a suitably qualified, competent, and professional ornithologist with extensive experience in completing avifaunal assessments and is a competent expert for the purpose of the preparation of this response.

Overview

Overall, the tone of the submission from the DAU is positive and pragmatic. The positives from the Nature Conservation perspective are highlighted, and where issues remain, these appear to be largely a matter of clarity. The summary on page 9 of 10 provides a useful reference for the key points of the submission. The following is stated:

“The Department notes that the additional documentation represents a clear effort to expand and strengthen the ecological assessment and includes a number of positive developments such as the Biodiversity Management and Enhancement Plan, the detailed monitoring programme, and the use of Hen Harrier habitat scorecards.”

In relation to the issues that remain, it is stated that (emphasis added):

...“greater clarity would be beneficial in relation to species-specific survey design, population-level impact assessment, the treatment of habitat loss and displacement, and the consideration of ecological factors such as nesting success and predation risk. While the inclusion of habitat scorecards represents a positive step, it is currently focused on monitoring and could be further integrated into the overall assessment framework.”

The key issues raised by the DAU relate to the following:

- Matters relating to the Appropriate Assessment, of which hen harrier is a key subset.
- Matters relating to the Environmental Impact Assessment

These matters will be addressed in turn in the subsequent sections.

Matters Relating to the Appropriate Assessment

The DAU advises that a condition be attached to planning (should permission be granted), that all mitigation measures outlined in the NIS and all other relevant documents must be implemented in full. The Applicant welcomes this recommendation.

Hen Harrier and the Appropriate Assessment

Much of the DAU submission focuses on hen harrier, which is unsurprising given that the Proposed Project is located within, or adjacent to, a hen harrier stronghold in the non-designated but regionally important North and West Clare area. Prior to mitigation, significant effects on hen harrier were identified during the EIAR process and consequently a comprehensive Biodiversity Management and Enhancement Plan (BMEP) has been developed to address and offset those effects. The BMEP is included as Appendix 6-4 of the EIAR.

What is unexpected, however, is the DAU’s characterisation of its hen harrier concerns as an Appropriate Assessment (AA) matter. There is no basis for such a position, as no source-pathway-receptor link exists between the Proposed Project and any Special Protection Area (SPA) designated for hen harrier. In other words, the issue does not arise within the scope of AA. Had the DAU considered that such a link existed, it would reasonably be expected to have explicitly identified and substantiated this point, as it would represent a fundamental issue requiring detailed examination. The absence of any such assertion strongly suggests that the DAU does not dispute the conclusion that no impact pathway exists to a hen harrier SPA.

A NIS is included with the planning application for the Proposed Project which includes a Stage 1 AA Screening in Section 4. Here, European Sites including Special Areas of Conservation (SAC) and Special Protection Areas (SPA) within the Likely Zone of Influence are identified, whereby a complete source pathway receptor chain is present in the absence of mitigation, and therefore there is potential for the

Proposed Project works to result in likely significant effects on this European Site. The following European Sites are located within the Likely Zone of Influence and is considered further in this assessment:

- Inagh River Estuary SAC (000036)
- Carrowmore Point to Spanish Point and Islands SAC (001021)
- Mid-Clare Coast SPA (004182)

As previously outlined, the Proposed Project is located within/adjacent to a non-designated hen harrier stronghold. The nearest SPA designated for breeding hen harrier is the Slieve Aughty Mountains SPA, which is approximately 25km from the Proposed Project. This greatly exceeds, by an order of magnitude, the foraging range of hen harrier, i.e. the core foraging range is 2km (with distances of up to 5km cited on occasion) and is therefore not carried through the NIS. As outlined in Section 7.3.8 of the EIAR, hen harriers are resident at the Proposed Wind Farm Site and are regularly observed commuting and hunting, primarily during the breeding season. There was a confirmed breeding territory identified 2km south of the Proposed Wind Farm Site in 2021, 2022, 2024 and 2025. If the hen harrier that were recorded within/adjacent to the Proposed Wind Farm Site are breeding within 2km they are by definition not breeding in a hen harrier SPA. In summary, it can be unequivocally stated that the hen harrier that are breeding within 2km of the Proposed Wind Farm Site are not connected to an SPA designated for hen harrier as they are resident locally and the separation distance to the nearest relevant SPA greatly exceeds the likely foraging distance of the species.

Matters Relating to the Environmental Impact Assessment

Hen Harrier: Adequacy of the Survey Scope

While the DAU consider the survey scope to be broadly “appropriate”, they wished to see more detailed and targeted surveys for hen harrier. These would have included *“habitat- or territory-based surveys that would provide a fuller understanding of nesting locations, foraging areas and territory structure.”* The DAU further state that, *“as a result, there remains some uncertainty as to how fully the ecological use of the site by Hen Harrier has been characterised, and how predicted impacts relate to the functioning of the local population.”*

In response, it is acknowledged that information on *“habitat- or territory-based surveys that would provide a fuller understanding of nesting locations, foraging areas and territory structure”* would be useful in undertaking an impact assessment however, this information has been provided in Section 7.2.3 of Chapter 7 of the EIAR. Furthermore, it is this information that supported the conclusion of a significant effect for foraging hen harrier during the Construction Phase and Operational Phase respectively in the absence of any mitigation. Accordingly, a comprehensive plan is proposed, which offsets this indirect habitat loss effect; please see the BMEP in Appendix 6-4 of the EIAR for further details.

As outlined in EIAR Section 7.2.5, a comprehensive suite of bird surveys was undertaken at the Proposed Wind Farm Site between October 2020 and September 2025. Results derived from a continuous five years of surveying at the Proposed Wind Farm Site and hinterland, undertaken in line with NatureScot guidance (industry best practise guidance), were analysed to inform this assessment. This survey effort greatly exceeds the minimum two-year requirement of NatureScot (2025). As such, the surveys undertaken provide the information necessary to allow a complete, comprehensive and robust assessment of the potential impacts of the Proposed Project on avian receptors. The DAU’s concerns regarding the adequacy of the survey scope seem to be firstly in relation to the survey coverage of the Site and secondly nesting locations. For ease of reference, a summary of the relevant surveys is provided below:

Surveys targeting onsite areas:

- Five years of vantage point surveys: October 2020 to September 2025. While these surveys are designed to record flight activity information at rotor swept height, views at low elevation are also available as evidenced by the fact that hunting flights were recorded from vantage point locations (as noted in EIAR Section 7.3.8.3).

- Breeding walkover surveys were conducted in daylight hours over four visits during the core breeding season months April to July in years 2021, 2022, 2023, 2024, and 2025. Breeding walkover surveys were undertaken to determine possible, probable or confirmed breeding bird activity within the Study Area (as defined in Chapter 7 of the EIAR) and to a 500m radius of these.
- Detailed habitat classification and assessment was undertaken by MKO at targeted locations within the permanent built infrastructure footprint of the Proposed Project, with relevés undertaken in 2025 within representative habitats at each turbine base and associated infrastructure. The location of each relevé is provided in Appendix 6-2 of the EIAR, the extent of each habitat on site was mapped using aerial photography, handheld GPS and smartphone technology (ArcGIS Field Maps). Please see EIAR Section 6.2.3.2 for further details.

The information provided from the above surveys provides a comprehensive description of the baseline. The duration of surveys spanning 2020 to 2025 provides confidence that the data is representative and not susceptible to sampling effects. It is highlighted to the Commission that the five years of bird surveys greatly exceed the minimum two-year requirement of NatureScot (2025).

As outlined in EIAR Section 7.3.8.3, there was only one confirmed hen harrier breeding territory (HH-b). Another potential territory was identified within the Proposed Wind Farm Site in 2021 (HH-a); however, a nest was not located, likely due to this bird not nesting (e.g. due to not finding a mate) or failing early in the season. There was no subsequent breeding observation in this location (2022 to 2025). As onsite surveys have already been discussed, they are not repeated here. Surveys targeting breeding territory HH-b:

- Breeding raptor surveys, with a specific focus on hen harrier, were undertaken within a 2km radius of the Study Area (as defined in Chapter 7 of the EIAR) to identify occupied territories and monitor their breeding success within the hinterland of the Proposed Wind Farm Site. Survey methodology followed (best practise) Hardey et al. (2013). Each breeding raptor location was surveyed once per month during the core breeding season between April and July in years 2021, 2022, 2023, 2024, and 2025. Six breeding raptor locations (BR1, BR2, BR3, BR4, BR5, and BR6) were used to identify and monitor breeding hen harrier territories.
- Specifically, BR3 overlooked the only confirmed hen harrier territory (Please see EIAR Figure 7-1-5). This territory was identified 2km south of the Proposed Wind Farm Site and confirmed to be active in 2021, 2022, 2024 and 2025. As provided in EIAR Appendix 7-4, Figure 7-4-10 hen harrier activity was concentrated around the nest. It is of note that this territory is within/adjacent to an operational wind farm.

Similarly to the onsite survey coverage, the duration and survey coverage provide confidence that the data is representative of the baseline conditions. In summary, the combination of onsite surveys and surveys targeting the confirmed hen harrier territory, provides the information requested by the DAU for “habitat- or territory-based surveys that would provide a fuller understanding of nesting locations, foraging areas and territory structure”. The evidence of industry best practise surveys is as follows:

- It is clear where the traditional hen harrier nest site is, i.e. located 2km south of the Proposed Wind Farm site. As there is no known land use change proposed, nesting is likely to continue in this area.
- The activity within this territory, foraging or otherwise, is concentrated near the nest. Additionally, there were regular observations of hen harrier activity onsite. Please see EIAR Appendix 7-4, Figure 7-4-6, 7-4-8 and 7-4-10 for location details.
- The territory structure includes a traditional nest site and foraging areas in open habitat, which includes the Proposed Wind Farm Site. Hen harrier have identified the habitats of the Proposed Wind Farm Site as suitable through their observed foraging activity within these same lands.

If the Proposed Project is built, there would be a 16% loss of the foraging habitat within the nearest known territory.; please refer to the EIAR Section 7.5.2.2 for details. This has the potential to result in a significant effect for the “*functioning of the local population*”, i.e. the nearest known nest within 2km. Accordingly, a comprehensive plan is proposed, which offsets this indirect habitat loss effect; please see the BMEP, EIAR Appendix 6-4 for further details. The successful implementation of the BMEP would ensure that

the construction of the Proposed Wind Farm will not significantly reduce the availability of suitable hen harrier habitats locally. In the event of a successful grant of permission for the proposed Wind farm, it is proposed to restore a significant amount of land for the benefit of hen harrier and to safeguard this land for the lifetime of the wind farm. This opportunity for the wind farm industry to fund the restoration of hen harrier habitat was highlighted in the most recent National Survey of Breeding Hen Harrier (2022) report. Section 4.6.7 states:

“There are opportunities for the wind energy industry to increase levels of land management certainty, and regulation/management of the activities within and surrounding windfarms (e.g. recreational users, dog walkers etc) and identify opportunities for the retention and restoration of habitats suitable for breeding (and wintering) hen harrier within and surrounding renewable energy developments.”

In Scotland, a habitat enhancement area of 235ha was established as part of a mitigation plan to address the potential impacts of a wind farm on a pair of hen harrier. This consisted of commercial forestry felling. The use of the enhancement area by hen harrier increased considerably after the wind farm was built, although they also continued to use the wind farm consistently (discussed in Gómez-Catasús and Balotari-Chiebao, 2022).

The DAU request *“a more explicit population-level framework”* to clarify the implications of the impact assessment. As already stated, there is predicted to be significant loss of foraging habitat for the local pair of hen harrier. If this effect is not offset, this would likely reduce the productivity of the local pair, which could slow the recovery of the declining regional population. The productivity of a single pair of hen harrier is unlikely to influence the status of the national population significantly. Notwithstanding this, and as previously outlined and reiterated herein, a comprehensive plan is proposed to offset habitat loss effects; please see the BMEP, EIAR Appendix 6-4 for further details.

The DAU welcome the BMEP, stating that it *“represents a constructive addition to the application”*. The DAU request clarification on *“how the enhancement measures will offset the functional loss of habitat or changes in habitat use that may occur.”* This is addressed through proportionate offsetting, by focusing on increasing passerine prey, through the reduction in the pressure of afforestation, siting the offsetting lands within the known range of hen harrier and through the reduction of negative edge effects associated with forestry, e.g. predation. This is discussed in detail in the BMEP (EIAR Appendix 6-4) and in particular in Section 3.4.1.3. For ease of reference, the key points are summarised below:

The two key elements that have been addressed are the proportionality and ecological functionality of the Proposed Hen Harrier Habitat Enhancement Areas. The justification for the choice of these areas includes the following:

- To address the requirement for proportionality, Proposed Hen Harrier Habitat Enhancement Areas have been proposed at a 1:1 ratio. In addition, the approximate 123ha of deforested lands will be restored to supporting habitat for hen harrier prey species.
- Foraging habitat will be created to replace the foraging habitat indirectly lost through displacement.
- The BMEP ensures the removal of closed-canopy forestry that would not otherwise have been felled until maturity (and subsequently replanted) without intervention. Noting afforestation as a threat/pressure of high importance (as per Article 12 reporting).
- The removal of forestry will reduce negative edge effects through deforestation, e.g. predation.
- There is a high likelihood of the Proposed Hen Harrier Habitat Enhancement Areas being encountered by hen harrier as breeding hen harrier occurs locally. As extrapolated from the results of the most recent National Hen Harrier Survey (Ruddock et al., 2024), hen harrier were confirmed to have bred in the 10km grid squares which overlap with the Proposed Hen Harrier Habitat Enhancement Areas in 2022 (i.e. R17. The remaining Proposed Hen Harrier Habitat Enhancement Areas are within the 10km grid square R18, which revealed no breeding pairs. Previous to this, hen harrier were confirmed to have bred in the 10km grid square R17 as per the Bird Atlas 2007-11. There is therefore longstanding breeding activity locally.

- The selected farmland areas are located between the turbines and the identified breeding territory and are therefore closer than the foraging habitat that will be potentially lost at the Proposed Wind Farm Site. Most hunting by males and females is carried out within 2km and 1km, respectively, from nests (Arroyo et al., 2014). There is one area proposed for permanent felling of forestry, located within 2km from the 2024 nest location. Location details are provided in Figure 7-5-4a of Confidential Appendix 7-5 of the EIAR.

The DAU also request the consideration of “*predation risk and edge effects associated with habitat configuration*”. Overall, the proposed BMEP will have a positive effect on both predator risk and negative edge effects associated with habitat configuration. As outlined in the above bullet points it is proposed to fell a large area of forestry (123ha), this is likely to reduce predation as forestry is associated with predation risk for hen harrier. Young conifer plantations provide cover suitable for nesting hen harrier; however, forest may be associated with higher rates of nest predation and lower prey availability around the nest (Wilson et al., 2015; Gómez-Catasús et al., 2021). The proposed enhancement lands are large areas chosen as such to ensure a low edge-to-area ratio. Larger, more contiguous blocks of open habitat support higher foraging use per unit area than the same total area split into smaller, more fragmented patches with proportionally more edge and less core interior. Please see the BMEP (EIAR Appendix 6-4) to visualise these areas.

Other Matters Relating to the Environmental Impact Assessment

The DAU advise characterising the effects resulting from the Proposed Project in relation to CIEEM Guidance and highlight that EPA guidance is used in the Biodiversity Chapter, whilst the Percival guidance (2003) is also used in the Ornithology Chapter “*as it is adapted specifically for use on effects on birds*”. While stating their preference, the DAU acknowledge that EPA and Percival guidance, used in the EIAR as submitted, can be used in ecological reports.

In considering the correct legal standard to be applied, the appropriate starting point is the text of the EIA Directive itself. In the context of the current application, an EIA is required, and an EIAR has been submitted with the application. The requirement of the content of the EIAR in relation to the identification of significant effects is described in Article 5(1)(b) of the EIA Directive. The wording is as follows:

- f) (1) Where an environmental impact assessment is required, the developer shall prepare and submit an environmental impact assessment report. The information to be provided by the developer shall include at least: (b) a description of the likely significant effects of the project on the environment;

The EIAR as submitted fulfils its requirement to the EIA Directive. In particular and by way of example, as outlined in EIAR Section 7.5.2.2, ‘Likely short-term **Significant** negative effect’ and ‘Likely long-term **Significant** negative effect’ were identified for foraging hen harrier during the Construction Phase and Operational Phase respectively. Accordingly, a comprehensive plan is proposed, which offsets this indirect habitat loss effect; please see the BMEP, EIAR Appendix 6-4 for further details. The DAU’s preference for CIEEM guidance is secondary to the requirements of the EIA Directive.

On the merits of Percival guidance (2003) as used in Chapter 7 of the EIAR, the DAU’s view seems to be that it is outdated. They state that there have been “*updates to legislation, red lists, and conservation status of species of conservation concern.*” The Percival guidance (*Birds and Wind Farms in Ireland: A Review of Potential Issues and Impact Assessment*), remains the only guidance that specifically concerns birds and the Irish wind farm industry. It provides a transparent framework for describing the significance of effects on birds of conservation concern in Ireland, fulfilling the requirement of the EIA Directive. The framework allows for “*updates to legislation, red lists, and conservation status of species of conservation concern.*” It remains the most relevant guidance document in the Irish jurisdiction for describing the significance of effects resulting from wind farm and bird interactions.

Notwithstanding this, as the DAU have requested significant effects to be characterised as per the CIEEM (2024) guidance, this has been provided for hen harrier. As noted previously hen harrier is the key ornithological receptor of most concern with the potential to be impacted as a result of the Proposed

Project. As per CIEEM (2024) guidance, the loss of 16% of the available habitat within the territory of the nearest known hen harrier pair is characterised as a significant negative effect at the regional scale (i.e. the North and West Clare Hen Harrier Stronghold), before offsetting. The rationale for this is as previously stated in Section 3.2.2 above. If the habitat loss effect is not offset, this would likely reduce the productivity of the local pair, which could slow the recovery of the declining regional population. However, the productivity of a single pair of hen harrier is unlikely to influence the status of the national population significantly.

While survey methodology has been discussed previously above, the DAU's comments on the proposed monitoring are largely positive.

Similarly, the DAU's comments in relation to the BMEP (Appendix 6-4 of the EIAR) are largely positive. They state:

"The Biodiversity Management and Enhancement Plan represents a positive development and sets out a range of measures aimed at improving habitat conditions."

In particular, the DAU welcomes the proposed use of the Hen Harrier Project Score Card¹ for assessing the success of the BMEP. They suggest that it would have been useful to use the same standard to evaluate the quality of the habitat that is being lost to the Proposed Project for hen harrier.

As previously outlined, a comprehensive habitat survey was undertaken within the Proposed Wind Farm Site. Detailed habitat classification and assessment was undertaken by MKO at targeted locations within the permanent built infrastructure footprint of the Proposed Project, with relevés undertaken in 2025 within representative habitats at each turbine base and associated infrastructure (see Appendix 6-2 of the EIAR). Please see EIAR Section 6.2.3.2 for further details. The habitat loss calculation was then undertaken with reference to the suitability of the habitats surrounding the Proposed Turbines. As outlined in EIAR Section 7.5.2.2, suitable habitat was defined as all open habitats likely to contain passerines (e.g., wet grassland and peatland) and forestry in its pre-thicket phase (Barton et al. (2006), Ruddock et al. (2012), O'Donoghue, (2012) & Irwin et al., (2012)). This is a sound scientific basis to estimate the relative value of the habitats that would be subject to habitat loss effects.

Conclusion

In conclusion, the Proposed Project has been specifically designed to avoid significant effect on hen harrier. This will be achieved in two key ways: firstly, through targeting the key threat/pressures acting on hen harrier that are classed as of high importance (as per Article 12) through deforestation. Secondly, through the rigorous implementation and audits of industry best practice prescriptive measures for the benefit of hen harrier. Following the clarification and explanation provided above, it has been clearly demonstrated that the concerns of the DAU have been comprehensively addressed within the submitted documentation as part of the planning application.

3.3 Health Service Executive

The National Environmental Health Service (NEHS), a section within the Health Service Executive (HSE), made a submission with observations and recommendations in relation to the following:

- > Public Consultation
- > Hydrology and Hydrogeology
- > Traffic Management and Road Safety
- > Emergency Medical Access
- > Noise and Vibration

¹ Wet grassland - Hen Harrier Programme Field Guidance for scoring Wet Grasslands ver 2, June 2021
Bog and heath - Hen Harrier Programme Field Guidance for scoring Bog and Heath ver 2, June 202

- > Shadow Flicker
- > Residential Amenity and Complaints Management
- > Other Recommendations

3.3.1 Public Consultation

The NEHS recommend that the existing Community Liaison Officer (CLO) arrangements be maintained throughout the construction and operational phases of the development. The NEHS also recommend that advance notification be provided to residents and other affected stakeholders in relation to abnormal load deliveries, road closures, rock breaking activities, and other potentially disruptive construction works.

Response

The Applicant acknowledges the recommendation by the NEHS and is committed to continuing regular communication and engagement with the local community in the event that the Proposed Project is granted planning permission. A Community Liaison Officer (CLO) will remain in place during the full lifetime of the Proposed Project.

3.3.2 Hydrology and Hydrogeology

With regards to Hydrology and Hydrogeology, the NEHS has acknowledged the Construction and Environmental Plan (CEMP) provided as part of the EIAR and notes the mitigation measures to be satisfactory. The NEHS recommends that, should consent be granted for the Proposed Project, the mitigation measures set out in the CEMP be implemented to prevent contamination of surface water, groundwater, and private supplies, thereby protecting drinking water sources and downstream receptors.

The NEHS recommend that pre-construction survey be carried out to identify any private water supplies within the potential zone of influence of the Proposed Project. Where such supplies are identified, appropriate buffer distances, protection measures, and monitoring should be implemented to ensure the protection of drinking water quality and public health. The NEHS state that there remains potential for unidentified private drinking water supplies to be present within the zone of influence of the Proposed Project. The NEHS also recommends that, where monitoring identifies a project related impact on the quality or quantity of a private water supply, a suitable alternative water supply should be made available until the affected supply is reinstated to its pre-development baseline condition.

Response

The Applicant acknowledges the recommendations set out by the NEHS with respect to Hydrology and Hydrogeology and confirms its commitments to implementing the mitigation measures, as detailed in Chapter 9 of the EIAR and the accompanying CEMP, in the event that the Proposed Project is granted planning permission.

Section 9.3.15.2 in Chapter 9 of the EIAR details the search that was undertaken of private well locations using GSI mapping and assumes that all dwellings in the surrounding lands have a private groundwater well. There are no wells with a locational accuracy of $\leq 50\text{m}$ mapped by the GSI within 1km of the Proposed Wind Farm Site. Section 9.5.2.10 in Chapter 9 of the EIAR assessed the potential effect on local groundwater wells. The assessment notes that the biggest risk to potential down-gradient wells will be from where deeper excavations are required such as the turbine bases and borrow pit, in this case, the closest distance between a proposed turbine or borrow pit location and a downstream dwelling house (potential well) is $>500\text{m}$. Due to the relatively shallow nature of the deepest excavations (3.5 - 8m), the hydrogeological regime and the $>500\text{m}$ setback distance from potential wells, there will be no significant effects on private wells.

Section 9.3.15.1 of the EIAR details the closest group water scheme being that of the Kilmaley/Inagh GWS located 5km to the southeast of the Site. Public water supply surface water abstractions in this area include Lough Naminna (Inagh Kilmaley Group Water Scheme) and Doo Lough. An assessment for the Doo Lough Public Water Supply (PWS) is included in Section 9.5.2.16 of the EIAR being that it is the only scheme that has connectivity to the Proposed Project. No significant effects will occur.

3.3.3 Traffic Management and Road Safety

The NEHS considers that, subject to the implementation, monitoring, and enforcement of an appropriately designed Construction Traffic Management Plan (TMP), significant adverse effects on population health, community wellbeing, road safety, and local accessibility are unlikely to occur. The NEHS recommend that a Road Safety Audit should also be undertaken in consultation with the relevant local authority, with particular consideration given to narrow rural roads and the safety of vulnerable road users.

Response

A detailed TMP is provided as Appendix 15-2 of the EIAR specifying details relating to traffic management. These measures are also included in the CEMP and will be implemented prior to the commencement of the construction phase of the Proposed Project. The TMP will be updated and agreed with the local authority and An Garda Síochána prior to construction works commencing on Site. The final detailed TMP will include the following:

- Appointment of Traffic Management Coordinator
- Delivery Programme
- Information to locals
- A Pre and Post Construction Condition Survey
- Liaison with the relevant local authority
- Implementation of temporary alterations to road network at critical junctions
- Identification of delivery routes
- Delivery times of large turbine components
- Travel plan for construction workers
- Additional measures (Wheel washing, sweeping, cleaning etc)
- Re-instatement works

It is confirmed that details for the TMP for the Proposed Project will be agreed with the relevant authorities prior to construction and contact will be maintained with the Road and Traffic Section throughout the construction phase to ensure that the provisions of the TMP will be implemented and managed appropriately.

As outlined in Section 15.1.10 of the EIAR, Traffico Road Safety Engineering Consultants Ltd conducted a Stage 1 Road Safety Audit for the access junction for the Proposed Wind Farm Site, in accordance with GE-STY-01024 Road Safety Audit Guidelines, TII, December 2017. The Stage 1 Road Safety Audit Report is attached as Appendix 15-4 of the EIAR.

All Problems raised by the Audit Team are responded to by the Design Team, as documented in Appendix A, Road Safety Audit Feedback Form of the Stage 1 Road Safety Audit Report. It should be noted that all responses are accepted by the Audit Team.

3.3.4 Emergency Medical Access

The NEHS recommends that continuous access for emergency services to all nearby dwellings, farms, and schools should be maintained throughout all phases of the development.

Response

The Applicant acknowledges the recommendations set out by the NEHS with respect to maintaining uninterrupted access for emergency services to nearby dwellings, farms, and schools throughout all phases of the development, and confirms its commitment to ensuring the same in the event that the Proposed Project is granted planning permission. As stated in Section 15.1.12.5.2 of the EIAR a Project Co-ordinator will be appointed who will be the main point of contact for all queries from the public or local authority during normal working hours. An "out of hours" emergency number will also be provided.

3.3.5 Noise and Vibration

The NEHS make a number of recommendations in relation to construction phase noise and vibration pertaining to working hours, vibration monitoring and assessment of cumulative noise and traffic impacts arising from the Proposed Project in combination with other permitted or proposed wind energy developments in the area.

The NEHS acknowledges that, subject to the implementation of appropriate mitigation measures and operational controls, significant adverse effects arising from noise, vibration, or construction activities are not anticipated. The proposed measures are considered sufficient to protect residential amenity, community wellbeing, and population health throughout the construction, operational, and decommissioning phases of the development.

Response

Chapter 12 Noise & Vibration of the EIAR includes a comprehensive assessment undertaken by AWN Consulting of the potential noise and vibration impacts associated with the Proposed Project and its component parts.

The assessment undertaken of the potential noise and vibration impacts associated with the Proposed Project is comprehensive and robust. The assessment of construction noise and vibration has been conducted in accordance with best practice guidance. Based on detailed information on the proposed turbine locations, turbine noise emission levels and turbine height, the predicted operational noise levels associated with the Proposed Project will be within best practice noise limits as described in Sections 12.3.5 and 12.4.4 of the submitted EIAR, and will be capable of adhering to any updated guidance, if necessary. Therefore, no significant noise effect is associated with the Proposed Project. Further details regarding Third-Party submissions raised on various topics under noise and vibration are addressed by AWN Consulting Ltd in included as **Appendix 2** of this response document.

The Applicant acknowledges the recommendations set out by the NEHS with respect to noise. Any conditions attached to a grant of planning permission will be considered by the Applicant following the Commission's determination.

3.3.6 Shadow Flicker

The NEHS acknowledges the shadow flicker mitigation measures identified in the EIAR and recommend incorporating predictive modelling, monitoring, turbine curtailment protocols, complaint investigation and annual review. The NEHS considers that, subject to these measures, significant adverse effects on residential amenity, community wellbeing, or population health are not anticipated.

Response

Chapter 5 of the EIAR includes a comprehensive shadow flicker assessment which ensures compliance with the daily and annual shadow flicker duration thresholds set out in the Wind Energy Development Guidelines for Planning Authorities (Department of the Environment, Heritage and Local Government

(DOEHLG), 2006) (hereafter referred to as the Guidelines (DoEHLG, 2006) and as stated in Section 5.4.3.2 of the EIAR, the mitigation measures (with stricter implementation of shadow flicker controls) also demonstrate that the proposed turbines can be operated in accordance with the shadow flicker requirements of the Revised Wind Energy Development Guidelines (the Draft Guidelines (DoHPLG, 2019)), should they be adopted as currently proposed, while the planning application is being determined.

The Applicant acknowledges the recommendations set out by the NEHS with respect to shadow flicker. Any conditions attached to a grant of planning permission will be considered by the Applicant following the Commission's determination.

3.3.7 Residential Amenity and Complaints Management

The NEHS recommend that construction lighting should be designed to minimise light spill and avoid unnecessary night-time illumination that may impact nearby residential amenity and sleep quality.

The NEHS also recommend that a formal complaints management and response procedure should be maintained throughout the construction phase, providing for the investigation, recoding, corrective action and feedback in relation to complaints associated with noise, dust, traffic, lighting and general residential amenity.

Response

The Applicant acknowledges the recommendations set out by the NEHS. Any conditions attached to a grant of planning permission will be considered by the Applicant following the Commission's determination.

3.3.8 Cumulative Effects

The NEHS recommends that mitigation measures identified within the EIAR to address cumulative effects should be implemented and maintained throughout the lifetime of the development, with particular consideration given to cumulative impacts on residential amenity, community wellbeing, noise exposure, and traffic-related disturbance.

Response

The potential for cumulative impacts arising from other projects has been fully considered within the EIAR, as outlined in Section 2.9 of Chapter 2. The cumulative impact assessment methodology is set out in Section 2.9 of the EIAR. The aim of the cumulative impact assessment is to identify what influence the Proposed Project will have on the surrounding environment when considered collectively with proposed and existing projects, projects pending a decision from the planning authority, projects in the public domain such as those Strategic Infrastructure Development (SID) at pre-consultation with ACP, and land-uses in the vicinity of the Site. The long list of cumulative projects is compiled through the data sources listed in Table 2-11 of the EIAR.

Each assessment within the EIAR (Chapters 5 – 15) carries out its own cumulative assessment based on the plans and projects within its cumulative study area, which are justified in Table 2-10 of the EIAR.

The recommendations set out by the NEHS with respect to mitigation measures to address cumulative effects, are set out in the EIAR, and the Applicant is committed to implementing the same in the event that the Proposed Project is granted planning permission.

3.3.9 Other Recommendations

With regards to pest prevention, the NEHS recommend that appropriate waste management, housekeeping, and pest prevention measures should be implemented within the temporary construction compounds and welfare facilities to prevent the attraction of rodents and other pests.

The NEHS also recommends the implementation of additional measures in the interest of public health, including compliance with Regulation (EC) No. 852/2004 where temporary food preparation, catering, or canteen facilities are provided, and compliance with Section 47 of the Public Health (Tobacco) Act 2004, as amended, where smoking shelters are provided.

Response

The recommendations set out by the NEHS are acknowledged. Any conditions attached to a grant of planning permission will be considered by the Applicant following the Commission's determination.

A waste management plan (WMP) is included as Section 3.8 of the Construction and Environmental Management Plan (Appendix 4-5 of the EIAR). The WMP outlines the methods of waste prevention and minimisation by recycling, recovery, and reuse at each stage of construction of the Proposed Project. Disposal of waste will be seen as a last resort. It is not envisioned that food preparation will occur onsite.

3.4 Transport Infrastructure Ireland

Transport Infrastructure Ireland (TII), made a submission which expressed overall support for the Proposed Project as it will help contribute to achieving the national target of renewable energy generation and reduction in greenhouse gas emissions, in line with National Strategic Outcome No. 8 of the National Planning Framework. TII provided observations and recommendations in relation to the following:

- Official Policy
- National Road Network Maintenance and Safety
- Proposed Turbine Component and Substation Component Delivery Route
- Structures
- Grid Connection Routing
- Greenways

3.4.1 Official Policy

TII raised the Commission's awareness in relation to Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Specifically, Section 2.5 of the DoECLG 2012 Guidelines sets out policy that seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses.

Response

TII acknowledge that the application documents submitted indicate no direct access requirements to the national road network in the first instance. Therefore, the Proposed Project is considered to be consistent with Section 2.5 of the DoECLG 2012 Guidelines.

3.4.2 National Road Network Maintenance and Safety

TII stated their concern in relation to the number of operational issues related to the Proposed Project and requested that any network maintenance and road safety are addressed prior to any decision on this planning application.

Proposed Turbine Component and Substation Component Delivery Route

TII outlined observations regarding deliveries of abnormal loads to the Site and abnormal load routes and their impact on national road network to assist ACP in the assessment of the subject application.

Response

The Proposed Project has been assessed within Section 4.6.2 and Section 15.1.9 of the submitted EIAR in regard to abnormal loads and an abnormal load route assessment. As stated in Section 15.1.12.5.2 of the EIAR, there will be a Delivery Programme included in the TMP which will be submitted to Clare County Council (CCC) in advance of deliveries of turbine components to the Site. Liaison with the relevant authorities, including TII and MMarC will be carried out where required. The programme will ensure that deliveries are scheduled in order to minimise the demand on the local network and minimise the pressure on the access to the Site. The Applicant confirms that thirdpartyworks@tii.ie will be contacted. Furthermore, the Proposed Project conforms with the TII Publications, as detailed in Table 15-1a of the EIAR where each of TII's concerns are addressed.

Structures

TII recommended the following condition to be applied to a grant of planning permission for the Proposed Project:

'Prior to the first delivery of any abnormal or exceptional abnormal load associated with the development, the applicant shall submit to, and agree in writing, with the relevant Roads Authority(s) an Abnormal Load and Exceptional Abnormal Load Management Plan. The Plan shall confirm the final haul route, pre- and post-delivery condition surveys of the public road network (including bridges and culverts where required), any necessary accommodation works, traffic management measures, and confirmation of statutory abnormal load permits and Garda escort arrangements. Prior to the first delivery of any exceptional abnormal load, the permitting process required under Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads') shall be completed to the satisfaction of the planning authority.

'The delivery of abnormal or exceptional loads may take place outside standard construction working hours where required under the statutory abnormal load permitting process and as agreed with the relevant Roads Authority(s).

'Reason: In the interests of road safety, protection of public infrastructure, and the orderly management of abnormal load movements'.

Response

It should be noted that Chapter 15 of the submitted EIAR states that, although the construction phase of the Proposed Project will involve the transportation of abnormal loads, the associated axle loadings will remain within accepted statutory and engineering limits. To ensure that any potential impacts on the road network are appropriately managed, a programme of pre-delivery route condition surveys and structural assessments is proposed. These measures form part of the Traffic Management Measures outlined in Section 15.1.13.5 of the EIAR.

The purpose of these surveys and assessments is to establish the existing condition and structural capacity of the affected transport route prior to the movement of abnormal loads and to identify any locations where additional mitigation measures may be required. Notwithstanding the above commitments, the Applicant has no objection to the inclusion of the proposed condition and agrees that it may be incorporated, where considered necessary, to provide further assurance regarding the protection and maintenance of the road infrastructure during the construction phase of the Proposed Project.

Grid Connection Routing

TII note that there are no grid connection proposals impacting the national road network in the area.

Greenways

In relation to any Greenway or Active Travel proposals in the vicinity of the Proposed Project, consultation with CCC's own internal project and/or design staff is recommended.

Response

The Applicant agrees to consult with CCC as required prior to construction of the Proposed Project should it be granted permission.

3.5

Clare County Council

The following section provides a response to the CCC's Chief Executive's (CE) Report submitted to the Commission under Section 37E(4) of the Planning and Development Act (as amended). The purpose of this report is to set out the views of the Planning Authority on the effects of the Proposed Project on the environment and the proper planning and sustainable development of the area. CCC provided observations and recommendations in relation to the following:

- Planning Policy
- Visual Amenity
- Residential Amenity
- Traffic
- Natural Heritage
- Peat Management
- Aviation Safety, Shannon Airport, Shanwick Air Routes and Cumulative Impact Concerns

3.5.1

Planning Policy

CCC raised concerns relating to the lack of a revised Wind Energy Strategy, which is due the pending finalisation of Section 28 Wind Energy Guidelines. CCC acknowledge that the Proposed Project is located within an area primarily designated as 'Strategic' in the Clare Wind Energy Strategy 2023-2029 (WES) and is therefore considered compliant with local, regional and national level policy in respect to renewable energy. However, CCC note the significant level of existing and proposed windfarm developments in West Clare and is concerned that the manner in which further proposals are being advanced lacks a coordinated or strategic approach and provides a risk of over development of wind farms. It is the view of CCC, that in the absence of updated Section 28 Guidelines, the Proposed Project would result in an over proliferation of turbines in this area.

Response

CCC's acknowledgement of the fact that the Proposed Project is located in a 'Strategic Area' for wind energy development under the current WES is welcomed. It is acknowledged that the WES has been carried over unchanged from previous CDP's, however, the WES is the current statutory plan governing wind energy at the local level in the County. Despite the age of the WES, the basis on which the Proposed Project Site was classified as a 'Strategic Area' remains fundamentally unchanged and pertinent (i.e wind resource, proximity to residential properties, geological conditions, ecological, archaeological and landscape sensitivities). CCC highlight the advancement of turbine technology since the introduction of the existing WES, noting the upward trend in turbine tip height. In this regard, it should be noted that the Draft Guidelines (DoHPLG, 2019), which are drafted for modern turbine technology, have been fully considered in the design of the Proposed Project. The Draft Guidelines (DoHPLG, 2019) As outlined in

Section 7.1.2 of the Planning Report, while the Guidelines (DoEHLG, 2006) remain the relevant statutory guidance, on the basis of the details available from the Draft Guidelines (DoHPLG, 2019), it has been demonstrated that the requirements of the Draft Guidelines (DoHPLG, 2019) can also be achieved.

CCC raise concerns regarding the cumulative impact of wind energy in West Clare, particularly in relation to the visual and residential amenity, construction activity, road impacts, and biodiversity. These issues are discussed in further detail in the following sections. With regard to cumulative assessment, each assessment within the EIAR (Chapters 5 – 15) carries out its own cumulative assessment based on the plans and projects within its cumulative study area, which are justified in Table 2-10 of the EIAR.

3.5.2 Visual Amenity

CCC notes that the Proposed Project would be appropriate within the existing character of the area and integrate well within the receiving landscape. However, it also highlights concerns regarding the cumulative effects of the Proposed Project when considered alongside surrounding consented wind farms. In particular, CCC considers that these combined developments could result in a near-continuous wind farm presence across the landscape, giving rise to an undesirable landscape and visual effect.

Response

All findings cited are drawn from Chapter 13 of the EIAR and its associated appendices (the Project LVIA), prepared in accordance with best practice guidance for the Landscape and Visual Impact Assessment (LVIA) of wind energy developments in Ireland. That guidance comprises the third edition of Guidelines for Landscape and Visual Impact Assessment (GLVIA3), the classification of significance in the EPA Guidelines (2022), and the Guidelines (DoEHLG, 2006) together with the Draft Guidelines (DoHPLG, 2019) .

Suitability of Receiving Marginal Upland Landscape Irrespective of Planning Policy

Wind energy development is distinctive by reason of its scale and form, so site selection requires landscapes with a lower susceptibility to change of that kind, and the distribution of existing and permitted wind energy development across Ireland demonstrates that marginal upland landscapes of the kind where the Proposed Wind Farm Site is located are typically robust and appropriate for commercial wind farms: sparsely settled working landscapes of lower sensitivity, at a scale that can absorb infrastructure while retaining separation from the lowlands where most visual receptors are located. The Proposed Wind Farm Site exhibits each of these characteristics, being an elevated area of western County Clare comprising pasture, coniferous forest, cutover peat bog and transitional woodland scrub, with the Proposed Turbines located on elevated grounds where forestry is the primary land use, and the Slieveacurry ridge is an elevated foothill to Slieve Callan rather than a distinctive landform or landmark warranting sensitivity at county, regional or national level, and has not been treated as such in the adopted policy of the county. The Site carries no high-sensitivity designation, lies outside County Clare Heritage Landscape, is privately owned and not used for public recreation, and has no cultural associations of significance; the Project LVIA accordingly considers the Proposed Wind Farm Site an eminently suitable landscape for accommodating the Proposed Project irrespective of the supportive Landscape policy and zoning set out below.

Proposed Turbines are visible within a Landscape where Wind Energy Development is envisioned in Local Planning Policy

CCC accepts that the Proposed Project would in principle comply with the designations of the Clare County Development Plan (CCDP) 2023-2029 and the WES, and confirms that the WES remains the adopted policy position of the Planning Authority.

All 9 no. Proposed Turbines are sited within a Strategic Area for wind energy development, covering approximately 2.9% of the county (EIAR Section 13.4.1.1.3, Figure 13-5). Those areas were zoned

following Strategic Environmental Assessment in which landscape and visual matters were a key consideration, informed by analysis of Heritage Landscapes, designated Scenic Routes and Landscape Character Areas. The Project LVIA reasons that the Strategy therefore “envision[s] turbines to be seen within the ‘Strategic Area’ landscapes where wind energy development has been specifically directed and promoted” (EIAR Section 13.4.1.1.2).

LCA 17, Sliabh Callan Uplands, carries the lowest sensitivity rating to wind farm development of any Landscape Character Area in the county, and Table 4a of the Strategy rates the appropriate wind farm size for it as Large, being 11 to 25 turbines. The Proposed Project comprises 9 no. turbines and is of a medium size based on the Strategy’s own definition (EIAR Figure 13-6).

Objective CDP 14.2 provides for development to be permitted in areas designated as Settled Landscape subject to stated criteria and does not operate as a constraint on development in principle. Settled Landscape is the residual tier of a three-tier classification comprising Heritage Landscapes, being the areas where sensitive scenic, ecological and historic resources are located; Working Landscapes, being intensively settled and developed areas within Settled Landscapes or areas with a unique natural resource; and Settled Landscapes, being the areas where people live and work. Settled Landscape covers approximately 51.6%, or 1,782 km², of County Clare (EIAR Section 13.4.1.1.5).

Objective CDP 14.2 applies to all development types across more than half the county, whereas the WES is directed specifically at wind energy development, zones approximately 2.9% of the county, and was informed by Strategic Environmental Assessment in which landscape sensitivities were expressly addressed; every Strategic Area lies within Settled Landscape, so if the criteria at CDP 14.2(a) and (b) were applied so as to preclude wind energy development in visually prominent upland locations, the Strategic Area designation could not operate anywhere in the county, and Objective CDP 11.47(c) directs that proposals be assessed having regard to the WES. CDP 14.2 states that development can be designed to reduce visual impact through choice of forms, finishes and colours, this has limited application to wind turbines, instead design and mitigation should be informed by the Guidelines (DoEHLG, 2006) and the Draft Guidelines (DoHPLG, 2019).

Prominence, Scale and the Applicable Guidance

The Draft Guidelines (DoHPLG, 2019) state on p.91 that wind turbines are often located in elevated exposed locations to optimise exposure to the wind resource, that “their size and appearance mean that all wind turbine development will be prominent within the landscape”, and that “since wind turbines cannot be hidden (without compromising their exposure to the wind resource), careful site selection as well as choice of wind turbine type and layout is the most effective way of minimising landscape and visual impacts”. Mitigation therefore lies in siting, turbine type and layout, and not necessarily in concealment.

CCC accepts that the landscape character type of the Site is Mountain Moorland, that the guidance contemplates larger developments and high turbines there, and that the Clare WES attributes to this area a capacity for wind farms of up to large scale. The guidance identifies ridges and peaks as the first of three acceptable locations for this type, advises that larger wind energy developments can generally be accommodated because they correspond in terms of scale, and states that “there would generally be no height restrictions on mountain moorlands as the scale of landscape is so great”. The design was assessed in the Project LVIA against all six categories of location, spatial extent, spacing, layout, height and cumulative effect (EIAR Section 13.4.2.5.1).

Comparison with Slievecallan and Siting on the Ridge

The CCC submission focuses on the Proposed Turbines being approximately 50 m taller than those at the existing Slievecallan Wind Farm, and on the existing turbines being sited on slopes with the mountain forming a backdrop. Figure 13-18, an extract from Viewpoint 07 at Quilty, records that from receptors to the south of the Proposed Turbines, the existing Slievecallan Wind Farm and the proposed Illaunbaun Wind Farm present the same height profile within the landscape, on three separate elevated landforms

separated by saddles of lower ground (Section 13.7.3.6). This scenario is a function of topography and the landform characteristics: Slieve Callan is the highest elevation in West Clare at 391 mAOD, whereas the Proposed Turbines stand on a plateau rising to approximately 260 mAOD. Therefore, the greater tip height of the Proposed Turbines on lower ground relative to the Slieve Callan Wind Farm does not produce a greater overall height of turbines when seen within the upland landscape and does not ‘introduce significantly more prominent structures’ as stated by CCC.

CCC notes the absence of a landform backdrop as a negative factor in the overall visual impact of the Proposed Turbines when compared with the Slievecallan Wind Farm. Siting on ridges and peaks is the first acceptable location the guidance identifies for this Mountain Moorland landscape character type. In line with the Guidelines (DoEHLG, 2006) and per best practice for siting and design of wind farms, turbines seen to be occupying elevated lands which are ‘breaking’, and clearly seen, above a ridgeline are widely considered to be advantageous from an LVIA perspective. In this scenario, the moving components of the turbines are read against open sky, so that the array is seen as a coherent group rather than overlapping and competing with the landscape features behind it. The Project LVIA records that all Proposed Turbines are sited on the ridges and peaks of mountain moorland and are clearly separated visually from the complexity of lower ground (EIAR Section 13.4.2.5.1 of Chapter 13 of the EIAR), and that the resulting form of the Proposed Turbines reads coherently and effectively corresponds to the receiving landscape, describing “a neat and coherent array of turbines sited appropriately on the Slievecurry ridgeline” at Viewpoint 05.

While CCC raises that the Proposed Turbines will be seen above the ridgeline, this is an acceptable scenario from a LVIA perspective and aligned with best practice siting and design of wind farms, all turbine components are seen above the horizon (e.g. Viewpoint 04), the Proposed Turbines “will not obstruct any views of the wider landscape or intrude upon any coastal views to the west from CCDP Scenic Route 15” (EIAR Section 13.7.3.5).

Visibility and the Assessed Viewpoints

The CCC submission concludes that the Proposed Project would be visible across a substantially wider geographical area and exert a considerably greater visual influence than existing wind farms in the vicinity. This is not reflected in the Project LVIA. The cumulative comparative Zone of Theoretical Visibility at Figure 13-16 records that the theoretical visibility of existing, permitted and other proposed turbines already covers the majority of the 25 km LVIA Study Area, and that the Proposed Project on its own adds very little to it (Section 13.6.1). There are consequently very few locations at which it would introduce turbines as new or novel elements in the landscape (EIAR Section 13.7.3.6).

Theoretical visibility is not in any event actual visibility, and the Route Screening Analysis and field survey work reported at Sections 13.3.1 and 13.3.2 of Chapter 13 of the EIAR establish that actual visibility across the LVIA Study Area is substantially less than the Zone of Theoretical Visibility indicates.

None of the 17 no. viewpoints, assessed give rise to a residual visual effect above ‘Moderate’ (EPA, 2022) with the development strategically sited in an upland area with appropriate set back distances and separation from sensitivities of the receiving landscape. Ultimately, the Project LVIA determined that through careful design and consideration of other mitigating factors, the Proposed Turbines will not significantly impact any of the key scenic sensitivities in the 25km LVIA Study Area.

Designated Scenic Routes

In regard to protected scenic amenity, the Proposed Turbines do not obstruct the views which the designated routes exist to protect. They add a new component to those views, in an upland which County Clare’s adopted policy has identified as the place where turbines are to be seen.

Section 14.5 of the Development Plan provides that in conserving views “it is not proposed that this should give rise to the prohibition of development along these routes but development, where permitted, should not seriously hinder or obstruct these views and should be designed and located to minimise their visual

impact”. The designation is expressly not a prohibition. Objective CDP 14.7(b) is framed consistently, being directed to effects on views towards scenic features or areas rather than to the appearance of the horizon generally.

The Project LVIA finds the views unobstructed at every assessed viewpoint on a designated scenic route. The Proposed Turbines are sited and laid out in accordance with the guidance for that landscape character type and set back approximately 3 km from the nearest designated scenic route, and the extension to the existing 110 kV Slievecallan substation will not be visible from the R474 some 450 m to the south, being visually contained by forestry plantation and landform (EIAR Section 13.4.2.3).

The key scenic sensitivities of the routes assessed in the Project LVIA are the views of the High sensitivity Heritage Landscape which focus on the open long-ranging coastal landscape views. Whilst the Proposed Turbines are visible from some sections of protected scenic routes, they are mostly visible inland, within marginal uplands in the background of views, in an area designated as having the lowest sensitivity rating to wind energy development in the entire county. The Project LVIA “found no significant visual impact on views from designated scenic routes or any impact on the key scenic sensitivities and views of the County Clare high sensitivity ‘Heritage Landscape’” (EIAR Section 13.8).

Cumulative effects on the Landscape

The Applicant does not dispute that the Proposed Project will contribute to cumulative landscape and visual effects. The perception of a wind energy landscape within a Strategic Area is the intended outcome of the adopted Clare WES, which exists to concentrate wind energy development where it can best be accommodated, and the Project LVIA records that landscape and visual effects “were among the primary considerations of the Planning Authority in designating this location as a Strategic Area” (Section 13.8).

On the perception of a continuous wind farm presence, the Project LVIA finds that from the south and south-west the three developments are seen on adjacent elevated landforms separated by a saddle of lower ground, with the Proposed Turbines reading as a visual counterbalance between them, and that from receptors immediately to the south-east the Proposed Turbines and the existing Slievecallan turbines are not visible within the same primary viewshed at all (EIAR Section 13.7.3.6, Figure 13-18). The residual landscape effects, accounting for cumulative effects, on LCA 17 was assessed as ‘Slight’, its undulating landform and well-defined ridgelines providing physical and visual separation between the developments within it and landscape characteristics with a capacity to accommodate many wind farms. No significant cumulative landscape effect arises on LCA 3, on LCA 20, on the Coast Heritage Landscape or on the Burren and Cliffs of Moher UNESCO Global Geopark (EIAR Section 13.7.3.3).

3.5.3 Residential Amenity

CCC highlight CDP 11.47(e) in their response which sets out an objective to strike a balance between facilitating renewable and wind energy development and protecting the residential amenities of neighbouring properties. CCC considered shadow flicker not to be an issue subject to appropriate monitoring and adherence to necessary mitigation however, they highlighted concerns regarding cumulative noise emission levels at sensitive locations, traffic movements associated with construction works and the visual dominance and overbearing presence of the Proposed Turbines on the surrounding landscape when viewed from existing dwellings.

Response

Noise Emissions

Chapter 12 of the EIAR provides a detailed assessment of any potential noise and vibration from the Proposed Project. It is considered under three stages: the short-term construction phase and decommissioning phases, and the long-term operational phase.

The assessment of construction and decommissioning noise and vibration was conducted in accordance with best practice guidance contained in *BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Noise* and *BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Vibration*.

Residual noise associated with the construction and decommissioned phases were predicted to be below the proposed threshold values. The associated noise and vibration levels are not likely to cause significant effect at any noise sensitive locations (NSL).

Based on detailed information on the Proposed Wind Farm Site, turbine noise levels were predicted at NSLs for a range of operational wind speeds. The predicted noise levels associated with the Proposed Project will be within the best practice noise limits recommended in the applicable Guidelines (DoEHLG 2006). Therefore, it is not considered that a significant effect is associated with the Proposed Project.

Operational noise from the proposed extension to the existing 110kV Slievecallan substation has been assessed and found to be within the adopted criteria. No significant vibration effects are associated with the operation of the Site. Therefore, it is not considered that a significant effect is associated with the Proposed Project. Furthermore, it is considered that the Proposed Project would be compliant with Objective CDP11.47(e) of the CCDP (as varied).

Further details regarding Third-Party submissions raised on various topics under noise and vibration are addressed by AWN Consulting Ltd in included as **Appendix 2** of this response document.

Traffic Movements

During the construction phase of the Proposed Project, it is noted there will be a negative, temporary and slight effect on traffic, which is not significant as outlined in Section 15.1.12.2 of Chapter 15 of the EIAR. The most significant traffic impact may be experienced during the construction phase primarily due to the slow speeds, size and geometric requirements of these vehicles. The provision of traffic management measures, including ensuring that these deliveries are made at night (as set out in Sections 15.1.8 and 15.1.12.2 of Chapter 15 of the EIAR and included in the Construction and Environmental Management Plan as Appendix 4-5 of the EIAR), will be required to minimise the impact of development traffic on the study network on these days.

A detailed TMP is provided as Appendix 15-2 of the EIAR specifying details relating to traffic management. These measures are also included in the CEMP and will be implemented prior to the commencement of the construction phase of the Proposed Project. The TMP will be updated and agreed with the local authority and An Garda Síochána prior to construction works commencing on Site. The final detailed TMP will include the following:

- Appointment of Traffic Management Coordinator
- Delivery Programme
- Information to locals
- A Pre and Post Construction Condition Survey
- Liaison with the relevant local authority
- Implementation of temporary alterations to road network at critical junctions
- Identification of delivery routes
- Delivery times of large turbine components
- Travel plan for construction workers
- Additional measures (Wheel washing, sweeping, cleaning etc)
- Re-instatement works

It is confirmed that details for the TMP for the Proposed Project will be agreed with TII and the Road Sections of CCC prior to construction and contact will be maintained with the Road and Traffic Section throughout the construction phase to ensure that the provisions of the TMP will be implemented and managed appropriately.

Visual Dominance

Section 13.7.3.5.2 of the Project LVIA comprehensively assesses and reports the varying degrees of visual impact on the small number of local residential receptors immediately surrounding the Proposed Wind Farm Site. The design of the Proposed Wind Farm Site has been informed by industry best practice set-back distances, with regard to the siting of the Proposed Turbines relative to residential receptors, including the following measures:

- All Proposed Turbines exceed the mandatory 500m set-back distance from residential receptors set out in the Guidelines (DoEHLG, 2006).
- All Proposed Turbines adhere to the recommended 4-times-tip-height set-back distance (700m) from third-party properties for residential visual amenity as prescribed by the Draft Guidelines (DoHPLG, 2019).

Overall, given adherence to the setback distances and other mitigating factors including relevant characteristics of the design and receiving landscape, visual effects on residential receptors are not deemed to be significant.

3.5.4 Traffic

CCC raise concerns in respect of the impact of the Proposed Project on the public road network and in particular the local roads servicing the Site. CCC requests that in the event that the Commission decide to grant permission for the Proposed Project, their provided list of recommended conditions should be attached.

Response

The Applicant acknowledges the recommended conditions and would accept their inclusion as part of any grant of permission, however wishes to note that the referenced Department Guidance *'Interim Guidance to Road Authorities regarding the proposed placement of Medium or High Voltage electricity assets, including ducts, cables and associated infrastructure under public roads'* (2026) is currently interim and not yet finalised. Any conditions regarding road reinstatement should have consideration of the most up to date guidance published at the time of decision by ACP.

3.5.5 Natural Heritage

CCC expressed concern regarding the potential effects of the Proposed Project on the hen harrier population in the vicinity of the Site and find difficulty concluding a finding of no significant effects in relation to the species. CCC queries whether cumulative effects have been assessed against the national population and note it may be appropriate to assess regional and national level impact following the 2022 national survey. While they welcome the measures proposed within the BMEP for the Proposed Project, CCC consider these not adequate enough to address short- to medium term-ecological impacts and impact avoidance should have been prioritised.

Response

As outlined previously in Section 3.2.2 of this response document, the significance of effects on hen harrier has been assessed within the EIAR under all requirements of the EIA Directive, and is stated in Section 7.5.2.2 of Chapter 7 of the EIAR. The BMEP measures proposed in Appendix 6-4 of the EIAR are welcomed by CCC and will be implemented fully as stated to offset any indirect habitat loss effects. This BMEP sets out the measures to be implemented which will ensure that the Proposed Project will result in a net gain in biodiversity.

As the national importance of hen harrier is well known in the region as part of the North and West Clare hen harrier stronghold, and the decline in population in Ireland as stated in the 2022 National Hen Harrier Breeding Survey acknowledged, a landscape-level assessment of suitable hen harrier habitat likely to be significantly impacted by the presence of turbines was undertaken and is included in Section 7.7.3.1 of Chapter 7 of the EIAR. In reviewing areas greater than 500m from the Proposed Turbines where significant effects are unlikely (Pearce-Higgins *et al.* (2009)) and lands greater than 100m above sea level (O'Donoghue (2004)), the assessment notes displacement effects associated with the Proposed Turbines account for 2.1% of the total upland area. In the specific case of hen harrier, significant displacement effects occur at 250m from turbines (compared to the 500m from the Proposed Turbines used in this assessment), therefore, cumulative impacts on hen harrier would be much less than those calculated at a landscape level.

Section 7.7.4.3 of Chapter 7 of the EIAR states that the successful implementation of the BMEP will ensure that the commissioning of the Proposed Project does not result in the loss of suitable hen harrier habitats. Further mitigation includes the creation of replacement foraging habitat in strategically located farmland areas, offsetting potential habitat displacement and maintaining suitable foraging opportunities near the breeding territory. The Proposed Project will therefore not contribute to a significant cumulative effect, as (as is proposed) there is no net loss of hen harrier habitat. Based on the annual rate of predicted collisions (no collisions predicted during the lifetime of the Proposed Project), significant collision risk effects are not predicted for this species either as a result of the Proposed Project alone or cumulatively (see Section 7.5.2.2 of Chapter 7 of the EIAR). The Proposed Project will therefore have no significant effects on the hen harrier population on a regional or national scale.

3.5.6 Peat Management

CCC raised concerns in relation to the amount of peat and spoil material to be managed on site, particularly in combination with the predominance of blanket bog soils, the extensive network of drainage channels, the proposed clear-felling of forestry and the road upgrades.

Response

The construction of the Proposed Project will require the excavation of peat and spoil. The quantities of peat and spoil, requiring management on the Proposed Wind Farm Site have been calculated and are presented in Table 4-2 of Chapter 4 of the EIAR. In order to effectively manage the peat and spoil material generated during the construction of the Proposed Project, a Peat and Soil Management Plan (PSMP) is included as Appendix 4-2 of the EIAR. The design of infrastructure associated with the PSMP has been informed by numerous site investigations completed in response to concerns regarding peat and spoil repositories on the Site and provides sufficient detail to give a clear understanding of the land and ground conditions (see Section 1.1.1 of Chapter 1 of the EIAR). All main infrastructure elements on the Site have also been assessed in a Peat Stability Risk Assessment (see Appendix 8-1 of the EIAR) which concludes that the Proposed Project has an acceptable margin of safety and is considered to be suitable, and of a low risk for peat failure provided appropriate control measures, such as implementing and maintaining an appropriate drainage system, are implemented. A full drainage design has been proposed for the Proposed Project and is included in Section 4.7 of Chapter 4 and Section 9.4.2 of Chapter 9 of the EIAR. These have been comprehensively assessed within Chapter 9 of the EIAR.

3.5.7 Aviation Safety, Shannon Airport, Shanwick Air Routes and Cumulative Impact Concerns

Included in CCC's response are concerns in relation to the Proposed Project and aviation safety, including Shannon Airport operations, AirNav Ireland surveillance systems, the Woodcock Hill radar facility and the Shanwick North Atlantic air traffic management system.

Response

Section 15.2.4 of Chapter 15 of the EIAR outlines the scoping and consultation process with relevant national and regional broadcasters, fixed and mobile operators and aviation authorities carried out for the Proposed Project. In relation to aviation, MKO on behalf of the Applicant, engaged with all relevant stakeholders throughout the design process to ensure compliance with aviation safety requirements and industry best practice. Responses were received from the following aviation consultees:

- Department of Defence (DoD)
- Irish Aviation Authority (IAA)
- Shannon Airport
- AirNav Ireland

Importantly, no aviation consultee identified any impacts on aviation operations or safety as a result of the Proposed Project or locations of the Proposed Turbines. The DoD provided guidance on obstacle lighting, while the IAA confirmed that in the event of a grant of permission the Applicant should be conditioned to contact the IAA for confirmation of requirements relating to turbine lighting, notification procedures, crane operations and the provision of as-built turbine coordinates. Following receipt of the coordinates for the Proposed Turbines, Shannon Airport responded stating the Proposed Turbines are not impacting on their safeguarding boundary of obstacle limitation surfaces and are in the region of 20km from the perimeter of that boundary. The response received from AirNav Ireland confirmed that the location and the construction of the Proposed Turbines will have no impact on Instrument Flight Procedures serving Shannon Airport, Communications and Navigation Systems or Surveillance (Radar). No concerns were raised about Woodcock Hill radar facility and the Shanwick North Atlantic air traffic management system by any aviation consultee.

As no impacts were identified by IAA or DoD, no mitigation measures are required. However, the Proposed Project will comply with IAA and DoD requests conditioned should the Proposed Project be consented. Section 15.2.5.3 of Chapter 15 of the EIAR notes, the Proposed Project will have no residual effect on aviation, therefore there will be no cumulative effects relating to the Proposed Project and surrounding projects in relation to aviation.

4. THIRD-PARTY OBSERVERS

There were 70 no. submissions received on the application from Third-Party Observers as listed in **Appendix 1. Table 4-1** below outlines common themes identified within the Third-Party Observers' submissions and the relevant areas of expertise within the project team assigned to address each theme. In the interest of brevity, where themes have been discussed in Section 3 of this document, reference is made back to the relevant section rather than repeating that discussion.

Table 4-1: Common Themes Raised in Third-Party Submissions

Themes Raised	Section Discussed	Lead Author for Response
Planning Policy, Guidelines & Legislation	Section 4.1	MKO Planning
Planning History	Section 4.2	MKO Planning
Project Splitting	Section 4.3	MKO Planning
Landowner Consent and Reinstatement Bonds	Section 4.4	MKO Planning
Public Consultation & Community Engagement	Section 4.5	MKO Planning
Site Selection & Reasonable Alternatives	Section 4.6	MKO Environment
Population & Human Health	Section 4.7	MKO Environment
Biodiversity	Section 4.8	MKO Environment
Ornithology	Section 4.9	MKO Environment
Geology & Soils	Section 4.10	MKO Environment
Hydrology & Hydrogeology	Section 4.11	AWN Consulting Ltd
Noise and Vibration	Section 4.12	MKO Environment
Landscape and Visual	Section 4.13	MKO Environment
Cultural Heritage	Section 4.14	MKO Environment
Material Assets	Section 4.15	MKO Environment
Cumulative Assessment	Section 4.16	MKO Environment

4.1 Planning Policy, Guidelines and Legislation

4.1.1 Clare County Development Plan 2023–2029

Several submissions reference the CCDP, stating that the Proposed Project is in contravention of policies and objectives relating to landscape protection, biodiversity protection and residential amenity.

Response

Chapter 2 of the EIAR and Section 7.2 of the Planning Report accompanying the application include a comprehensive assessment of the Proposed Project against policies and objectives of the CCDP, the Local Authority Renewable Energy Strategy (LARES) and the Clare WES.

For ease, these objectives have been reproduced below, accompanied by a discussion.

As detailed in Section 2.5.4.3 of the EIAR, the Proposed Project is located within an area designated as 'Strategic' for wind energy development, with the surrounding lands designated as 'Acceptable in Principle'. Accordingly, the Proposed Wind Farm Site is located in an area that has been designated as the most suitable in the hierarchy for the provision of wind energy development in the County.

“WES 8: ‘Strategic Areas’

These key areas are considered to be eminently suitable for wind farm development and are of strategic importance because of:

- Good / excellent wind resources;
- Access to grid;

- Distance from properties and outside any Natura 2000 sites.”

Section 7.2 of the Planning Report accompanying the application includes a comprehensive assessment of the Proposed Project against policies and objectives of the CCPD relating to Landscape:

“CDP 14.2 Settled Landscape

It is an objective of the Development Plan: To permit development in areas designated as ‘settled landscapes’ that sustain and enhance quality of life and residential amenity and promote economic activity subject to:

- I. Conformity with all other relevant provisions of the Plan and the availability and protection of resources;*
- II. Selection of appropriate sites in the first instance within this landscape, together with consideration of the details of siting and design which are directed towards minimising visual impacts;*
- III. Regard being given to avoiding intrusions on scenic routes and on ridges or shorelines.*

Developments in these areas will be required to demonstrate:

- a) That the site has been selected to avoid visually prominent locations;*
- b) That the site layouts avail of existing topography and vegetation to reduce visibility from scenic routes, walking trails, water bodies, public amenities and roads;*
- c) That design for buildings and structures reduce visual impact through careful choice of forms, finishes and colours, and that any site works seek to reduce visual impact.”*

“CDP14.7 Scenic Routes

It is an objective of CCC:

- a) To protect sensitive areas from inappropriate development while providing for development and change that will benefit the rural community;*
- b) To ensure that proposed developments take into consideration their effects on views from the public road towards scenic features or areas and are designed and located to minimise their impact; and*
- c) To ensure that appropriate standards of location, siting, design, finishing and landscaping are achieved.”*

The Proposed Project is located within a settled landscape, where energy development is an envisaged land use, and has been designed with due regard to designated Scenic Routes. Of the 35 Scenic Routes in the county, 15 are located within the LVIA Study Area, with the nearest approximately 3 km from the closest proposed turbine. The landscape and visual impacts have been comprehensively assessed in Chapter 13 of the EIAR, which concludes that the Proposed Project is appropriately scaled for its location and will not result in significant visual effects on designated Scenic Routes, protected landscape character, or the key scenic sensitivities of the County Clare Heritage Landscape. This assessment is supported by photomontages prepared from 17 representative viewpoints included in Volume 2 of the EIAR.

Section 7.2 of the Planning Report accompanying the application also includes a comprehensive assessment of the Proposed Project against policies and objectives of the CCPD relating to Biodiversity:

- CDP 3.3 Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment,
- CDP 15.1 Biodiversity,
- CDP 15.3 European Sites,
- CDP 15.4 Requirement for Appropriate Assessment,

- CDP 15.5 Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs),
- CDP 15.10 Environmental Impact Assessment,
- CDP 15.12 Biodiversity and Habitat Protection,
- CDP 15.14 Habitat Fragmentation and Green Infrastructure Corridors and
- CDP 15.19 Woodlands, Trees and Hedgerows

Chapter 6 of the EIAR includes a comprehensive assessment of the potential effects (both alone and cumulatively with other projects) the Proposed Project may have on Biodiversity, Flora and Fauna, and sets out the mitigation measures proposed to avoid, reduce or offset any potential significant effects that are identified. Following implementation of the proposed mitigation measures as described in the EIAR, significant residual impacts on biodiversity, flora and fauna are not anticipated.

The BMEP included as Appendix 6-4 in the EIAR secures no net loss of habitats and delivers a net gain in biodiversity through hedgerow and riparian woodland planting, the management of existing hedgerows and wildlife corridors, and dedicated peatland, marsh fritillary and hen harrier habitat enhancement. The ecological assessments undertaken and mitigation measures proposed demonstrate that the Proposed Project safeguards protected species and habitats, and achieves a net gain in biodiversity, in full accordance with the biodiversity objectives of the CCDP.

Chapter 5 of the EIAR provides a comprehensive assessment of potential impacts of the Proposed Project on human beings during the construction, operational and decommissioning phases. The assessment considers a range of factors including health and safety, employment and investment, population, land-use, noise, dust, traffic, tourism, residential amenity, renewable energy production and reduction in greenhouse gas emissions, shadow flicker and interference with communication systems. Where potential adverse effects have been identified, appropriate mitigation measures are proposed to avoid, reduce, or offset these effects. Subject to the implementation of the mitigation measures set out in the EIAR, the Proposed Project will not result in significant adverse effects on population or human health.

It is therefore the case that the Proposed Project **does not contravene** the policies and objectives outlined above. It is also emphasized that these policies should be considered in the context of the urgent need to accelerate the deployment of renewable energy infrastructure, including onshore wind energy, and to reduce greenhouse gas emissions; something which cannot be ignored. .

4.1.2

Wind Energy Development Guidelines

Some Third-Party Observers highlighted concerns with the Proposed Project's use of the 2006 Wind Energy Development Guidelines and noted that the Draft Guidelines (DoHPLG, 2019) have not yet been adopted. There was also reference made to CCC's motion on wind farm developments pending updated national guidelines. On this basis, the submissions consider the application to be premature pending the adoption of updated national guidance.

Response

As set out in Section 1.3.2 of the EIAR, at the time of writing, the Draft Guidelines (DoHPLG, 2019), have not yet been adopted, and the relevant guidelines for the purposes of Section 28 of the Planning and Development Act 2000, as amended, remain to be the Guidelines (DoEHLG, 2006). However, as outlined in Section 7.1.2 of the Planning Report, while the Guidelines (DoEHLG, 2006) remain the relevant statutory guidance, on the basis of the details available from the Draft Guidelines (DoHPLG, 2019), it has been demonstrated that the requirements of the Draft Guidelines (DoHPLG, 2019) can also be achieved.

While the final guidelines have not yet been published, it should be noted that shadow flicker and noise are entirely controllable and will be capable of adhering to the relevant standards. Further discussion is provided in Chapter 5: Population and Human Health and Chapter 12: Noise and Vibration of the EIAR respectively. In addition, the Proposed Project maintains a four times tip height set back between turbines

and third-party sensitive receptors which is currently the recognised standard for visual amenity purposes, as outlined in the Draft Guidelines (DoHPLG, 2019).

The motion that was brought forward in 2025 called for the consideration of new onshore wind farm planning applications to CCC to be paused pending the finalisation of the Draft Guidelines (DoHPLG, 2019). The Draft Guidelines (DoHPLG, 2019) have remained in draft form since 2019 and cannot be utilised as a means by which to delay consideration of wind energy applications particularly when considering the policy framework in place to speed up the delivery of renewable energy across the country, in addition to the requirements laid out under Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended, as outlined above in Section 2. While the motion has passed, this has not legally stopped CCC from processing or determining planning applications. A precedent exists here with regards a motion made in July 2021 seeking CCC to cease granting planning permission for onshore wind farms in the West Clare Municipal District. In this instance the CCC's Planning Department expressly advised that:

- determination of planning applications is an executive function;
- applications must be assessed individually;
- the Planning Authority is constrained by the Planning and Development Acts, the Development Plan, Ministerial Guidelines and other relevant planning considerations; and
- it was not appropriate or legal to impose a cessation on the granting of planning permissions for onshore wind farms.

In the case of the 2025 motion, the CCC Senior Planner correctly advised members at that meeting that *'it would not be appropriate that Clare County Council would interfere with the statutory processes around assessing and deciding on planning applications'*.

In short, the motion is not a statutory moratorium on planning applications being considered and decided upon. The CCDP, including the WES, has statutory planning status. The motion does not infringe on the Commission's determination of this planning application.

4.1.3 EU Directives

A number of submissions raised concerns regarding the Proposed Projects compliance with EU Directives, in particular the EIA Directive, the Water Framework Directive (WFD), EU habitats and Birds Directive.

Response

As detailed in Section 1.3 of Chapter 1 in the EIAR the Proposed Project complies with the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU. In addition, Article 94 of the Planning and Development Regulations 2001 (as amended) sets out the information to be contained in an EIAR, with which the EIAR complies. The EIA will be undertaken by the Commission, as the competent authority.

The EIAR provides information on the receiving environment and assesses the likely significant effects of the Proposed Project on it and proposes mitigation measures to avoid or reduce these effects. The function of the EIAR is to provide information to allow the Commission to conduct the EIA of the Proposed Project. All elements of the Proposed Project have been assessed as part of the EIAR.

Appendix 9-3 presents the WFD Compliance Assessment Report, which has been prepared in accordance with the requirements of the WFD, including the obligations established under Article 4 of Directive 2000/60/EC. The assessment considers the WFD objectives relating to the prevention of deterioration and the achievement of good ecological and chemical status. In accordance with Article

4(1), Member States are required to prevent any deterioration in the status of surface water and groundwater bodies and to protect, enhance, and restore water bodies with the objective of achieving good status.

Article 6(3) of the Habitats Directive requires that an AA is undertaken for any plan or project that is not directly connected with, or necessary for, the management of a European protected site, where the potential exists for significant effects on that site. The assessment considers the potential impacts of the proposed development in relation to the conservation objectives of relevant European sites. In accordance with Section 177U of the Planning and Development Act (as amended), and the requirements of Part XAB of the Act, an AA Screening Report and NIS have been prepared to accompany this Section 37E planning application. The AA will be undertaken by the Commission as the competent authority.

The assessment presented in Chapter 7 (Ornithology) of the EIAR has been undertaken having regard to the requirements of the Birds Directive (Directive 2009/147/EC on the conservation of wild birds) and the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended, which transpose the requirements of the Birds Directive into Irish legislation. In addition, the AA Screening Report and NIS submitted with the planning application has been prepared in accordance with the relevant requirements of the Habitats and Birds Directives and associated Irish legislation.

4.2 Planning History

4.2.1 Previous Refusals

A number of submissions make reference to the previous refusal of planning permission on the Site. The submissions outline concerns regarding the previous reasons for refusal.

Response

The previous reasons for refusal provided by ACP (ABP-312728-22) have been carefully considered and addressed in the current application throughout the EIAR as summarised in Section 1.1.1 of Chapter 1 of the EIAR. Each reason for refusal is also addressed in detail in Table 3.1 of the Planning Report which accompanies the application.

Reason No. 1 of ACP's refusal was in relation to the Proposed Peat and Spoil Repositories. In response to this, additional detailed site investigations and surveys were undertaken to further characterise the land and ground conditions at the Proposed Wind Farm Site. This includes an updated Peat Stability Risk Assessment encompassing all project elements and a revised Peat and Spoil Management Plan. Drainage and environmental monitoring measures have also been further developed for the construction and operational phases to ensure the protection of the receiving environment. Full details are provided in Chapter 4: Description of the Proposed Project and are assessed in Chapter 8: Land, Soils and Geology and the associated appendices.

Reason No. 2 of ACP's refusal related to assessments of adverse effects on European sites. Specifically, the potential sediment pollution impact of the Proposed Project, individually or cumulatively with other projects, on the watercourses in the area, and the prospect of this affecting the integrity of the surrounding European Sites. The submitted NIS concludes that that the Proposed Project, on the basis of the best available information, beyond reasonable scientific doubt, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site, in view of its conservation objectives. Further assessment of the potential for effects of the Proposed Project is considered cumulatively and in combination with other proposed developments within the NIS.

Furthermore, reason No. 3 of ACP's refusal related to concerns over significant cumulative effects on species of high ornithological value. The EIAR provides an updated assessment of likely significant impacts of the Proposed Project on avian receptors, supplemented with over 5 years of continuous field surveys. Following its implementation alongside the proposed hen harrier habitat enhancement plan, the Proposed Project will not contribute to a significant cumulative effect, as there will be no net loss of hen harrier habitat. Please refer to Chapter 7: Ornithology and associated appendices including Appendix 6-4 BMEP.

Additionally, there have also been marsh fritillary habitat conditions assessments and larval web surveys have been undertaken in 2024 and 2025 to ensure the Proposed Project design has no significant effects on marsh fritillary habitat. Following implementation of the proposed mitigation measures and the BMEP, there are no significant effects on habitat of high value to Annex II species associated with the Proposed Project. Please refer to Chapter 4: Description of the Proposed Project, Chapter 6: Biodiversity, Chapter 7: Ornithology and associated appendices including Appendix 6-4 BMEP. Further detail on how the planning application addresses the previous reasons for refusal is included in the following sections of this report.

4.3 Project Splitting

Some Third-Party Observers to the Commission raised concerns that the Proposed Project, together with surrounding separate wind energy projects are being treated as separate applications. They suggest that the Applicant may be engaging in project splitting, dividing the project into smaller parts to downplay the overall environmental and social impacts.

Response

The Proposed Project has been developed as a standalone project on lands that are geographically distinct from other wind energy developments in the wider area. The Proposed Project has been progressed to the planning stage through its own individual planning and design processes. Project splitting arises where a larger development is artificially divided into smaller parts in order to avoid or reduce the scope of environmental assessment. That is not the case here. The Proposed Project has been assessed in full as a complete project, with all associated infrastructure and likely significant effects considered as part of the EIAR and NIS, where applicable. No element of the Proposed Project has been omitted from the EIAR assessment.

Furthermore, the EIAR recognises that separate developments may exist within the same geographic area. In such circumstances, the appropriate mechanism for considering potential interactions between projects is through the cumulative impact assessment. Accordingly, all relevant EIAR chapters include an appropriate cumulative assessment, as described in Section 2.9 of the EIAR, considering cumulative effects with other existing, permitted, and proposed developments in the surrounding area. This approach is consistent with statutory requirements, relevant guidance, and established planning practice.

4.4 Landowner Consent and Reinstatement Bonds

Landowner Reinstatement Bond

Several submissions expressed concern relating to the decommissioning of the Proposed Project and requests are made for a reinstatement bond to be put in place by the landowners to guarantee the full removal of turbines and associated infrastructure.

Response

The request for a legally binding reinstatement bond is noted. The Proposed Project has included detailed provisions for the decommissioning and restoration of the site at the end of the operational life of the development, with the details of the proposed restoration measures set out in Chapter 4, Section 4.12 of the EIAR and Appendix 4-6 Decommissioning Plan. This provides for the removal of relevant project infrastructure and the restoration of the Site following cessation of operation of the Proposed Turbines.

MKO acknowledges the importance of ensuring that adequate provisions are in place for decommissioning. It is noted that ACP often include a condition on wind farm planning permissions that requires a reinstatement bond to be put in place between the developer and the local planning authority to secure reinstatement works on cessation of the project. The Applicant confirms that it is willing to accept any reasonable planning condition imposed by the ACP in this regard, including conditions relating to the provision of appropriate financial security to ensure compliance with the approved decommissioning and reinstatement measures.

Landowner Consent

Other submissions question the Applicant's inclusion of lands within the red line boundary of the planning application.

Response

ACP should note that the Applicant is satisfied that they have presented the necessary legal consent to make the subject planning application. ACP will also note Section 31(13) of the Planning and Development Act 2000 (as amended) which states the following:

'A person shall not be entitled solely by reason of a permission under this section to carry out any development.'

The inference of this provision of the legislation is that a grant of planning permission does not facilitate a developer undertaking works on land outside their ownership based solely on a grant of planning permission. The planning application process is not the forum in which to resolve conflicts pertaining to land ownership, that is a civil matter in respect of which ample recourse is available to relevant parties, should it be necessary.

4.5

Public Consultation & Community Engagement

Concerns have been raised suggesting there was a lack of community consultation process undertaken as part of the Proposed Project. Submissions have claimed that there was a lack of meaningful public engagement, with insufficient information, and ineffective communication.

Response

Throughout the design, development and planning application process, the Applicant has undertaken extensive efforts to engage with local stakeholders and ensure that the public is fully informed of the nature, scope, and details of the proposed development and associated works. Some of these communication methods are outlined below.

A Community Engagement Report is included as Appendix 2-2 of the EIAR, which outlines the steps that the Applicant has taken since project inception to ensure transparent community engagement through all phases of the project to date. This report has been prepared in line with the requirements as set out in the Draft Guidelines (DoHPLG, 2019) – Community Engagement.

In February 2020, a CLO was appointed and remains as the point of the contact for the Proposed Project. The CLO has made contact with many people throughout the whole planning and development process and has conducted several door-to-door consultations of the nearby households. The CLO's relevant contact information has been readily available on the Proposed Project's information website since officially launching in September 2020. This website provides extensive, up to date information relating to the Proposed Project.

Active engagement and consultation with the local community has taken place over the past 6 years, including two public information exhibitions in 2020 and 2025, multiple rounds of letter updates and door-to-door consultations. Please refer to the Community Engagement Report at Appendix 2-2 of the EIAR for further details.

4.6 Site Selection & Reasonable Alternatives

Concerns are raised that the EIAR is insufficiently broad and gives limited consideration of the landscape and alternative uses to the Site in the absence of the Proposed Project.

Response

Chapter 3 of the EIAR introduces the reasonable alternatives considered by the Applicant which are relevant to the Proposed Project and its specific characteristics and an indication of the main reasons for the option chosen, taking into account the environmental effects. The Proposed Project is considered against a 'Do-Nothing' Scenario whereby the Site is left as it is, with no changes made to the current land use practices of coniferous forestry, agriculture, turf cutting, existing renewable energy infrastructure and public road corridor on the Site. In doing so, the environmental effects in terms of emissions are likely to be neutral. However, the opportunity to capture the available renewable energy resource would be lost, as would the opportunity to contribute to meeting Government and EU targets for the production and consumption of electricity from renewable resources and the reduction of greenhouse gas emissions. The opportunity to generate local employment, local authority development contributions, rates and investment in the local area would be lost. Furthermore, the opportunity to implement the measures outlined in the BMEP as outlined in Appendix 6-4 would also be lost.

As stated in Section 3.2.4.1 of the EIAR, despite the Applicant having an interest in exploring potential offshore sites, a combination of both onshore and offshore wind farm development will continue to be required to deliver on the ambitious renewable energy targets due to delays with the regulatory process for offshore development. The Applicant's primary focus remains to be onshore wind farms, and they will continue to explore potential development offshore in tandem with delivering suitable sites onshore such as the Proposed Project. As such, the option of an offshore project is not considered to be a reasonable alternative at this time.

4.7 Population and Human Health

4.7.1 Turbine Setback and Spacing

Concerns have been raised regarding turbine setback in relation to residential properties as well as turbine spacing.

Response

As noted in Section 5.3.1 of Chapter 5 of the EIAR, the closest sensitive receptor, belonging to an involved landowner, is located over 500m from the nearest proposed turbine (T2), i.e. over the minimum recommended setback for properties involved in the project (500m). The closest third-party sensitive receptor is located greater than 700m from the nearest proposed turbine (T3), i.e. over the recommended

4x tip height setback (700m) from properties not involved in the project (as recommended in the Draft Guidelines (DoHPLG, 2019)).

Section 4.1.1.1 of the EIAR details the Proposed Wind Farm Site layout has been optimised using wind farm design software (WindPRO) to maximise the energy yield from the Proposed Project, while maintaining sufficient distances between the proposed turbines to ensure turbulence and wake effects do not compromise turbine performance.

4.7.2 Shadow Flicker

Concerns have been raised regarding shadow flicker from the Proposed Project, as well as the cumulative effect of shadow flicker from the Proposed Project and that of the nearby operational Slieveacallan Wind Farm.

Response

Section 5.3.6.1 of the EIAR, outlines the predicted maximum daily and annual shadow flicker levels considered in the context of the Guidelines (DoEHLG, 2006) daily threshold of 30 minutes per day and annual threshold of 30 hours per year. Potential cumulative shadow flicker effects associated with the existing Slieveacallan Wind Farm and proposed Illaunbaun Wind Farm have also been considered for all properties within the overlap Shadow Flicker Study Area and the corresponding shadow flicker study areas of the other existing and proposed developments.

As detailed in Section 5.4.3.2.9 of Chapter 5 of the EIAR, the Applicant has committed to a robust shadow flicker mitigation protocol to ensure the effectiveness of the proposed mitigation measures. This approach reflects established best practice and has been proven at operational wind farms in Ireland and internationally, providing a robust and reliable mechanism to ensure shadow flicker impacts remain within accepted guideline limits.

It is therefore considered that a robust and comprehensive mitigation strategy for the Proposed Project has been provided, which is capable of addressing any identified shadow flicker effects.

4.7.3 Health

Some Third-Party Observers raise concerns in relation to the potential of negative health effects associated with the Proposed Project due. Concern was raised regarding potential for health impacts on vulnerable members of the community, as well as around mental health and wellbeing.

Response

Section 5.3.4 and Section 5.4 of Chapter 5 of the EIAR address the concerns raised in the submissions regarding Human Health. Please refer to these sections for further details.

While there are anecdotal reports of negative health effects on people who live very close to wind turbines, peer-reviewed research has not supported these statements. There is currently no published credible scientific evidence to positively link wind turbines with adverse health effects.

Extensive research has been carried out in the US, Canada, UK, Australia, and by the World Health Organisation (2018). All studies conclude that that exposure to wind farms does not trigger adverse health effects.

None of the submissions received in relation to this topic area have set out any clear and credible evidence which in any way alters the findings of the EIAR in this regard. As such, it is concluded that the information contained within the EIAR remains valid and robust.

4.7.4 Equine Industry/Livestock Impact

Concerns have been raised about the impact of the Proposed Project on the equine industry and livestock, particularly in regard to the proximity of the Proposed Turbines.

Response

Section 5.3.1.7 of Chapter 5 of the EIAR addresses the potential for impacts on the equine industry. In the absence of national policy or guidance in relation of the development of wind farms near stud farms/equestrian centres in Ireland, MKO has reviewed the British Horse Society's '*Advice on Wind Turbines and Equestrian Access*'. A copy of the guidance document is included in Appendix 5-3 of the EIAR.

While there is currently no Irish policy regarding setbacks/impacts to livestock from turbines, the conclusions outlined in the EIAR (Chapter 5: Population and Human Health, Chapter 8: Land Soils and Geology, Chapter 9 Hydrology and Hydrogeology, Chapter 10: Air Quality and Chapter 12: Noise and Vibration) of the effects of the Proposed Project on the receiving environment do not indicate any negative effects on livestock nor provide evidence of the same as a result of the Proposed Turbines.

MKO remains satisfied that the impacts on the equine industry and livestock are considered and have been fully assessed within the EIAR.

4.7.5 Property Prices

Concerns have been raised about the potential for the Proposed Project to have adverse effects on the value of properties in the vicinity of the Proposed Project.

Response

Section 5.4 of Chapter 5 of the EIAR addresses the potential for impacts on property values, identifying that there is insufficient evidence from the scientific literature and studies conducted to determine that there is the potential for a significant effect on property values as a result of the Proposed Project. The impact assessment on property values outlined below takes a precautionary approach and assumes that based on the inconclusive evidence summarised in Section 5.3.5 of the EIAR, there is the potential for long-term slight effects on property values located within 1km of the proposed turbines during the early operational phase of the Proposed Project. This effect is not considered to be significant.

4.7.6 Tourism

Concerns have been raised relating to the negative impacts that the Proposed Project could have on tourism.

Response

Section 5.3.2 of Chapter 5 of the EIAR provides details on tourism statistics in relation to Co. Clare and the Proposed Project site specifically, details tourist attractions in the area and provides literature and studies (Section 5.3.2.3) conducted in relation to tourism and wind farms.

The impact assessment on tourism in Section 5.4.3.1.5 of the EIAR notes that based on the literature review in Section 5.3.2.3, the majority of studies indicate that wind farm developments do not deter visitors to tourist attractions or scenic landscapes where turbines are visually evident. There are no impacts determined to arise.

4.7.7

Residential Amenity

Concerns have been raised regarding residential amenity and quality of life in relation to the Proposed Project. Submissions detail turbine setback, shadow flicker, noise, landscape and visual, as well as aviation/turbine lighting and loss of internet communications.

Response

Turbine setback and shadow flicker are already responded to above in Sections 4.7.1 and 4.7.2 respectively. Noise is responded to below in Section 3.11 and landscape and visual is previously in Section 3.5.3.

Aviation issues, most specifically turbine lighting is required by the IAA. Section 15.2.3.5 of Chapter 15 of the EIAR details that the Irish Air Corps Position Paper notes that in all locations where wind farms or masts are permitted, they should be illuminated by high intensity strobe lights, be identifiable hazards relative to additional lighting in the vicinity and remain visible to night vision equipment. Consultation responses from the IAA and the DoD in Section 2.7 in Chapter 2 and Section 15.2.4.3 of Chapter 15 of the EIAR details the requirement for lighting on permitted turbines.

Potential loss of internet communications is assessed in Section 15.2.5.3.1 of the EIAR. The Proposed Project will have a long-term, imperceptible, negative impact on the telecommunications signals of any operator, due to distance from or absence of any links in the area. In addition, a protocol agreement, ensuring no impacts on broadcast signals, has been signed between 2m and the Applicant, please see Appendix 15-5 of the EIAR.

4.8

Biodiversity

Observations are made regarding the ecological impact assessment included within Chapter 6 Biodiversity of the EIAR and the potential effects the Proposed Project may have on protected and sensitive ecological receptors, as well as the AA and NIS included as part of the planning application.

4.8.1

Protected Species

Several submissions raise concerns about potential effects on species identified within the Site and discussed within Chapter 6 of the EIAR, several of which are protected under the Birds Directive (2009/147/EC) and Habitats Directive (92/43/EEC). Species protected under the Birds Directive are addressed in Section 4.10 below. Species of concern under the Habitats Directive (92/43/EEC) include pine marten, bats, red squirrel, Irish hare, badgers and marsh fritillary.

Response

It is noted that several of these species have been identified within the Site. A comprehensive survey of the biodiversity within the Site was undertaken to inform Chapter 6 Biodiversity of the EIAR. Ecological surveys were undertaken in line with TII (2008) guidelines (Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes). Please see Section 6.2.3 of Chapter 6 of the EIAR for full details of any specific methodologies used for surveys including marsh fritillary, bats and botanical assessments.

The results of the desk study, scoping replies and incidental records of protected species recorded during multidisciplinary walkover surveys were all used to inform the scope of targeted ecological surveys required. Based on these findings dedicated surveys for bats, otter and badger, red squirrel and pine marten were undertaken. During the multidisciplinary walkover surveys, records of invertebrates including butterflies, damselflies, dragonflies, moths, beetles etc. were recorded. As suitable marsh

fritillary habitat was identified following initial site visits and based on records in the wider area following the desk study, dedicated marsh fritillary butterfly surveys were carried out (see section below).

For all species identified on the Site, the potential impacts of the Proposed Project during the construction, operational and decommissioning phases have been assessed (see Section 6.5 of Chapter 6 of the EIAR). The ecological effects of potential impacts arising from the Proposed Project are characterised as per the CIEEM 'Guidelines for Ecological Impact Assessment in the UK and Ireland' (2018). effects were identified during the assessment, significant effects relating to disturbance and/or mortality are not anticipated following the implementation of the mitigation measures proposed in Chapter 6 of the EIAR. Accordingly, no significant negative effects on any identified species are anticipated at any geographic scale.

Marsh Fritillary

Several submissions raise concerns over the potential effects of the Proposed Project on marsh fritillary and suitable habitat within the Site. As it is acknowledged that potential effects on marsh fritillary were a reason identified for refusal of the previous planning application for a renewable energy development within the Site, the Proposed Project takes consideration of the effects on the Annex II species and its supporting habitat during all stages of its development and the EIAR. Section 1.1.1 of Chapter 1 Introduction of the EIAR notes potential effects on Annex II species including marsh fritillary were a key consideration of the design of the Proposed Project. The full suite of dedicated marsh fritillary surveys completed are outlined in Section 6.2.3.3.4 of Chapter 6 of the EIAR. While wet grassland (GS4) habitats within the Site were either managed for agricultural purposes or were of low flora diversity, it nonetheless provides potential supporting habitat for important faunal species such as marsh fritillary through the presence of Devil's-bit scabious. Therefore, wet grassland (GS4) has been assessed local important (higher value).

In the absence of mitigation measures, there is potential for the Proposed Project to have significant effects on marsh fritillary via direct mortality, indirect effects through nearby construction works and loss of suitable breeding habitat. Mitigation measures are therefore provided in Section 6.5.2.2.2 of Chapter 6 of the EIAR. As part of the BMEP for the Proposed Project (Appendix 6-4) it is proposed to manage approx. 20 ha of agricultural wet grassland into species rich grassland, within which frequent Devil's-bit scabious has been recorded. Additionally, within the Proposed Wind Farm Site, approx. 29.7 ha of identified potential supporting habitat for marsh fritillary (under grazed) will be subject to adaptive grazing regime, which will be monitored and adjusted to enhance existing habitat within the Site. The successful implementation of these measures will not only offset any potential loss of habitat but will result in a significant net gain in suitable marsh fritillary habitat within the Site. Full details on habitat establishment, as well as operational monitoring are provided in Appendix 6-4. Furthermore, as stands of Rhododendron have been recorded throughout the Site, including within potential marsh fritillary habitat, an Invasive Species Management Plan (ISMP) has been prepared and is included in Appendix 6-5. With the successful implementation of the ISMP, no significant effects on supporting marsh fritillary, as a result of the spread of rhododendron from the construction phase of the Proposed Project, are anticipated.

4.8.2 Sensitive Habitats

Concerns are raised on the existing sensitive habitats within the Site and the potential significant effects that may occur as a result of the Proposed Project.

Response

Section 6.5 of Chapter 6 of the EIAR assesses the potential effects on Key Ecological Receptors, which include rivers, streams, wetlands and Sensitive Aquatic Faunal Species as well as peatland habitats.

Detailed mitigation measures in relation to the protection of surface and ground water during construction are provided in Section 9.5.2 of Chapter 9: Hydrology and Hydrogeology of the EIAR. Following the

implementation of mitigation measures, there will be no residual effects on aquatic habitats or species, at any geographic scale, as a result of the Proposed Project.

The Proposed Project has been designed to avoid the majority of the peatland habitats within the Site. However, the permanent built infrastructure footprint of the Proposed Project will result in the loss of degraded wet heath (HH3), Upland blanket bog (PB2) and cutover bog (PB4) habitat mosaics. The impact is restricted to a small percentage of the overall habitat within the Site. Therefore, there is potential for significant effects on peatland habitats, at a local scale only. As there will be some unavoidable loss of peatland habitats to facilitate the Proposed Project, a BMEP has been included as part of this application (see Appendix 6-4 of the EIAR). The BMEP includes for the felling of c. 123 ha of forestry and the management of the underlying upland habitats to re-establish more diverse peatlands. In addition, the BMEP has provided detailed methodology on Forest to Bog measures to restore 34.6 ha of blanket bog within the felling areas. These areas have been selected given their suitability for restoration, based on the level terrain and deep peat depths, and will be managed as per NatureScot (2025) Forest to bog guidelines. These measures will first, offset the loss of peatland habitat within the Site, but will also, overtime, ensure a net gain in the extent of such habitat in the local environment. Furthermore, as stands of Rhododendron have been recorded throughout the Site, an ISMP has been prepared and is included in Appendix 6-5. With the successful implementation of the ISMP, no significant effects on peatland habitats, as a result of the spread of rhododendron from the construction phase of the Proposed Project, are anticipated.

It is claimed that the EIAR omits an area of Oak-Birch-Holly Woodland (WN1) within the Site. A review of the Irish Reports for Article 17 of the Habitats Directive (92/42/EEC), including the Heath, Bogs and Mires, Irish Semi-Natural Grassland Survey datasets, National Survey of Native Woodlands and Ancient and Long-Established Woodland datasets, was carried out as part of this ecological impact assessment. None of the NPWS GIS datasets contain polygon or point data for WN1 within the Site. Full details of all the botanical surveys and results are provided in Appendix 6-2 of the EIAR and an assessment of the potential for the Site to support Annex I habitats is also provided in this Appendix.

4.8.3 **Bats**

Observations of bat roosting within the Proposed Wind Farm Site are noted.

Response

A full assessment of impacts of the Proposed Project on bats is included as Appendix 6-1 of the EIAR, and details summarised within Chapter 6 Biodiversity of the EIAR. A search for bat roosts was undertaken within 200 m plus the maximum rotor radius (i.e. 75 m) of the Proposed Turbines in line with NatureScot 2021 guidance. No structures, building or trees were identified within the 275 m bat roost search buffer and no bat roosts were identified. All surveyed structures within the Site will be retained and avoided as part of the Proposed Project.

Typical site-level collision risk for high-risk bat species at the Proposed Wind Farm Site was assessed as Low. At peak activity levels, the risk assessment increased to Medium for Leisler's bat, common pipistrelle, soprano pipistrelle and Nathusius' pipistrelle. A bat monitoring and mitigation strategy has been devised for the Proposed Project, see Appendix 6-1 of the EIAR for further details. Taking into account the sensitive design of the Proposed Project and the implementation of best practice and adaptive mitigation measures, no significant long-term residual effects on any bat species are anticipated with regard to:

1. Collision mortality, barotrauma and other injuries,
2. Loss or damage to commuting and foraging habitat,
3. Loss or damage to roosts,
4. Displacement of individuals or populations

4.8.4 Appropriate Assessment

Observations are made regarding the conclusions of the NIS included as part of the planning application.

Response

As outlined previously in Section 3.2.2 of this document, a Stage 1 AA Screening is included in Section 4 of the NIS. For these European Sites considered further in the assessment, Section 5 of the NIS document assesses the potential for likely significant effects in the absence of any mitigation, individually or cumulatively with other plans or projects, and outlines qualifying features that have the potential to be adversely affected by the Proposed Project, Conservation Objectives and site-specific pressures and threats for those qualifying features that have the potential to be adversely affected.

Section 6 of the NIS document assesses the potential effects of the Proposed Project on the identified relevant Qualifying Interests/Special Conservation Interests. This assessment is undertaken in the absence of any mitigation and in respect of the conservation objectives of the European Sites. There will be no direct effects on the Qualifying Interests (QIs) or on the Special Conservation Interests (SCIs) of any of the above European Sites, as a result of habitat loss/degradation, the ex-situ disturbance/displacement of QIs/SCIs, or collision risk as a result of the construction, operational, or decommissioning phases of the Proposed Project. Mitigation, including by design and avoidance as well as site-specific best-practice measures are also outlined where indirect effects are identified.

Based on the above, the NIS concludes in view of best scientific knowledge, on the basis of objective information, there is no potential for adverse effect on the identified qualifying interests/Conservation Objectives and their associated targets and attributes, or on any European Site. Potential pathways for effect have been robustly blocked through measures to avoid impacts and the incorporation of best practice/mitigation measures into the project design. Taking cognisance of measures to avoid impacts and best practice/mitigation measures incorporated into the project design which are considered in the preceding section, the Proposed Project will not have an adverse effect on the integrity of any European Site, in view of its Conservation Objectives.

4.9 Ornithology

Concerns have been raised regarding the potential effects of the Proposed Project on key ornithological receptors (KORs), including hen harrier and several other species.

Response

Hen Harrier

Several submissions note the presence of hen harrier in proximity to the Site and highlight this as the reason for the previous refusal for a renewable energy development within the Site. Concerns raised regarding adequacy of survey methodology, significance of effects and BMEP details are addressed in Sections 3.2.2 and Section 3.5.5 of this document.

Other Species

Third-party submissions are also made on other species sighted during field surveys, including golden plover, kestrel, curlew and cuckoo, regarding their presence in proximity to the Site. Table 7-11 in Chapter 7 Ornithology of the EIAR outlines the rationale for including or excluding each target species recorded during field surveys as a KOR. The status, population importance evaluation following NRA (2009) and a detailed explanation for inclusion/exclusion as a KOR is provided. The sensitivity of species included as KORs are then evaluated in Section 7.4.3 of the EIAR. Following the measures described in

Section 7.6 of the EIAR, no effect significance greater than Low, as per Percival (2003) criteria, was identified for any KOR. No effect significance greater than likely long-term slight negative effect, which is not significant, as per EPA (2022) criteria, was identified for any KOR. Taking into consideration the effect significance identified and the proposed best practice mitigation measures, significant residual effects on the KORs with regard to direct habitat loss, disturbance/displacement or collision mortality are not anticipated.

It is claimed that barn owl has been omitted from the results of the ornithological impact assessment. As outlined previously in Section 3.2.2 above, field surveys were undertaken during the survey period October 2020 to September 2025, consisting of five breeding seasons (April – September) and five non-breeding seasons (October – March). This survey work forms the core dataset for the assessment of impacts on ornithology. The full survey methodology is described in Section 7.3.2 of Chapter 7 Ornithology of the EIAR. During the extensive survey efforts, which is noted to greatly exceed the minimum two-year requirement of NatureScot (2025), no barn owl sightings have been reported within the Site.

4.10 Geology & Soils

4.10.1 Peat Stability

Concerns were raised relating to peat depths, peat stability and landslide risk, as a consequence for water pollution. In addition, reference was made to the EU Nature Restoration Law (Reg 2024/1991).

Response

As detailed in Section 8.3.3.2 of Chapter 8 of the EIAR, a total of 914 no. peat depth probes were carried out at the Proposed Wind Farm Site. Peat depths recorded across the Proposed Wind Farm Site ranged from 0 to 5m with an average depth of 0.7m. This would be considered shallow for upland blanket bog.

As detailed in Section 8.3.10 of Chapter 8 of the EIAR and the associated Geotechnical and Peat Stability Risk Assessment (GPSRA) included as Appendix 8-1 of the EIAR, the overall risk assessment determines that the Site has an acceptable margin of safety and is suitable for the Proposed Project. The Site is considered to be of a low risk for peat failure provided appropriate control measures, such as implementing and maintaining an appropriate drainage system, are implemented. It is noted that in Section 9.5.2.2 of Chapter 9 of the EIAR, that excavations of peat, such as those that could cause peat instability, have been properly mitigated against i.e. by avoidance, drainage design etc. and therefore allow for a negative, imperceptible, indirect, short term, likely effect on down gradient rivers, water quality, and dependant ecosystems and no significant effects.

Section 8.7.2.5 of Chapter 8 of the EIAR, determines that based on the results of the GPSRA, which involved analysis of 280 no. locations, as well as management of peat stability with appropriate construction practices, a negative, imperceptible, direct, unlikely, permanent residual effect on peat and subsoils is determined, resulting in no significant effects.

The EU Nature Restoration Law notes an obligation to restore/rewet degraded blanket bogs. Chapter 6 relates to Biodiversity and the BMEP, Appendix 6-4 of the EIAR, was developed for the Proposed Project. As detailed in Section 6.5.2.1.2 of the EIAR, there will be no loss of peatland habitats as a result of the proposed BMEP. The BMEP includes for the removal of c. 123 hectares of forestry within previous habitats, allowing the recolonisation of underlying habitats. Additionally, areas of level ground (c. 34.6 ha) with deep peat have been identified to restore high quality blanket bog habitat, following guidance set out by NatureScot (2025), Forest to Bog Restoration.

4.10.2 Peatland Carbon Store

Concerns are raised about blanket bogs being active carbon stores and the effect the Proposed Project will have on carbon sequestration.

Response

Chapter 11 of the EIAR, Climate, includes a full Carbon Assessment and details the importance of peatlands as carbon sinks (Section 11.4). All projected carbon losses associated with turbine infrastructure lifecycle (manufacture, construction, decommissioning) of the Proposed Project are calculated and assessed. As detailed in Section 11.5.3.1 of the EIAR, the construction of the Proposed Project at this site will displace approximately 34,791 tonnes of carbon dioxide per annum. This, alongside the biodiversity measures detailed in the BMEP (Appendix 6-4 of the EIAR) which propose to restore high quality blanket bog habitat, will allow for a positive effect on overall climate as a result of reduced greenhouse gas emissions and will increase future sequestration capacity at the Site.

4.11 Hydrology & Hydrogeology

4.11.1 Water Quality

Concerns have been raised relating to impacts to water quality and drainage.

Response

As detailed in Sections 9.5.2.2, 9.5.2.4, 9.5.2.5, 9.2.5.6 and 9.5.2.7 of Chapter 9 of the EIAR, there are no significant effects on water quality during construction.

A full drainage design has been proposed for the Proposed Project and is included in Section 4.7 of Chapter 4 and Section 9.4.2 of Chapter 9 of the EIAR. Drainage drawings also have been submitted and are included within the planning pack and as Appendix 4-3 of the EIAR. As assessed in Section 9.5.2.2 of Chapter 9 of the EIAR, construction works including excavations can impact drainage. The implementation of drainage management alongside that existing drainage within the site will ensure that there are no significant negative effects on site drainage.

4.11.2 Groundwater and Private Wells

Concerns have been raised relating to impacts on groundwater and private water supplies surrounding the site.

Response

Please see response to HSE regarding hydrology and hydrogeology in Section 3.3.2 of this document for relevant details addressing concerns on impacts on groundwater and private wells

4.12 Noise and Vibration

Concerns are raised in relation to potential noise and vibration effects of the Proposed Project on noise sensitive locations and cumulatively with other existing and proposed developments in proximity to the Site, including the existing Slievacallan Wind Farm. These include impacts on residential amenity and human health

Response

Responses to these submissions has been prepared by AWN Consulting Ltd and is included as **Appendix 2** of this response document. The topics raised include:

- Turbine Set Back Distances
- Turbine Spacing and Wake Turbulence
- Background Noise Survey Methodology
- Turbine Noise Assessment
- Amplitude Modulation
- Low Frequency Noise / Infrasound
- Substation Noise Assessment
- Assessment of Derelict Dwellings
- EIA Significance Rating
- Slieveacallan Wind Farm Noise Compliance

Noise concerns regarding Population and Human Health (including Health and Residential Amenity) are addressed in Section 4.7 above. It should be noted that concerns regarding the operational noise of the existing Slieveacallan Wind Farm are not relevant to the application for the Proposed Project, however the Noise and Vibration assessment considers the cumulative effects of the Proposed Project in combination with other proposed and existing developments, including the existing Slieveacallan Wind Farm. The results of the operational phase due to wind turbine noise (inclusive of the existing Slieveacallan Wind Farm) are detailed in Section 12.6.3.1 of Chapter 12 of the EIAR.

Following the assessment outlined in Chapter 12 of the EIAR, based on detailed information on the Proposed Wind Farm Site layout, turbine noise emission levels and turbine hub height, turbine noise levels have been predicted at NSLs for a range of operational wind speeds. The predicted noise levels associated with the Proposed Turbines will be within the best practice noise limits recommended in the applicable Guidelines (DoEHLG 2006). Operational noise from the proposed extension to the existing 110kV Slieveacallan substation has been assessed and found to be within the adopted criteria. Therefore, it is not considered that a significant effect on Noise and Vibration is associated with the Proposed Project.

4.13 Landscape and Visual

Concerns have been raised about the potential for the Proposed Project to have adverse effects on the landscape and visual amenity.

Response

Please see response to CCC regarding visual and residential amenity in Sections 3.5.2 and 3.5.3 of this document.

4.14 Cultural Heritage

Concerns have been raised over an unidentified cultural heritage feature as well as other features, including stone circle (CL031-052) that may be impacted by the Proposed Project.

Response

The 19th-century hand-built stone bridge (approx. 52 deg 51'20.6"N, 9 deg 20'15.2"W) referenced in one of the Third-Party Observations was not included in the assessment as it is outside the EIAR Site Boundary. The bridge is not being utilised for the Proposed Project as an identified route for delivery of construction materials nor operational access to the Proposed Wind Farm Site. No intensive use of this bridge will be

required for accessing the Proposed Enhancement Site. Construction vehicles for the Proposed Wind Farm Site will be utilising the delivery route as detailed in Section 4.6 in Chapter 4 of the EIAR.

Stone circle (CL031-052) was identified within the Site and included in the Cultural Heritage Assessment in Chapter 14 of the EIAR. Section 14.3.3.3 of this chapter assesses the potential impact of the construction phase on this monument. When mitigation including a 30m exclusion zone is applied, there will be no significant effects on the monument.

All other monuments relevant to the Site which may potentially be impacted by the Proposed Project have been assessed in Chapter 14 with no significant effects arising.

4.15 Material Assets

4.15.1 Traffic and Transport

A number of submissions raise concern regarding the road networks capacity to facilitate the construction traffic associated with the Proposed Project. Furthermore, concerns are raised regarding road safety, road degradation and disruption to local residents.

Response

Regarding road capacity, the turbine delivery vehicles for the construction phase of the Proposed Project have been modelled in the swept path assessments for the Site, as detailed in Chapter 15 of the EIAR. It should also be noted that while there will be abnormally sized vehicles associated with the Proposed Project, all axle loads will be within weight accepted limits. As outlined in Chapter 15 of the EIAR, roads condition surveys pre-construction surveys will be completed in accordance with TII recommendations and requirements of CCC Roads Department. A pre-condition survey of roads associated with the Proposed Project will be carried out prior to construction commencement to record the condition of the roads. A post construction survey will be carried out after works are completed. Where required the extent and timing of these surveys will be agreed with the local authority, as set out in the Traffic Management Measures, included set out in Section 15.1.12.5 of Chapter 15 of the EIAR. All road surfaces and boundaries will be re-instated to pre-development condition, as agreed with the local authority engineers. All works will be done in accordance with the Guidelines for the Opening, Backfilling and Reinstatement of Openings in Public Roads, DTToS, September 2015 which is common practice for similar renewable energy developments.

Concerns regarding road safety are addressed in the TII response in Section 3.4.2 of this document. Additionally, a Road Safety Audit is included as Appendix 15-4 and a TII design report Appendix 15-5 which ensured that any potential road safety issues were identified and ameliorated. The Stage 1 Road Safety Audit is summarised in Section 15.1.11 of Chapter 15: Material Assets of the EIAR. Therefore, the Proposed Project will not result in any road safety issues.

4.15.2 Aviation

Some submissions note concerns about the potential for the Proposed Project to have adverse effects on aviation operations within the area, particularly in regard to Shannon Airport and the Spanish Point Airstrip.

Response

As outlined in Section 3.5.7 of this response document, consultation with all relevant aviation consultees identified no potential effects on aviation as a result of the Proposed Project.

4.15.3 Telecommunications

Concerns have been raised about the potential for the Proposed Project to have adverse effects on the telecommunication and broadcast links, with several submissions noting poor connection with the wider area and interference from existing turbines in proximity to the Site.

Response

Telecommunications assessment is outlined in Section 15.2 of Chapter 15: Material Assets of the EIAR. As described in the scoping and consultation section, relevant national and regional broadcasters, fixed and mobile operators, aviation authorities in November 2024 and other relevant consultees were contacted in January 2025. In addition to this, consultation was also carried out with Commission for Communications Regulation (ComReg) in order to identify any other additional licensed operators in the vicinity of the Site to be contacted. A full list of telecommunications consultees contacted as issued by ComReg is included in Section 15.2.4 of Chapter 15: Material Assets of the EIAR.

No operators identified any links within interference proximity of the Proposed Turbines, the nearest link identified was by Vodafone which has one link that passes through the Proposed Enhancement Site but not the Proposed Wind Farm Site. RTÉ Transmission Network (2rn) identified no fixed links within the Site, however stated that there is a high risk of interference to broadcast services from the area to the southwest of the Site. As a result, 2rn requested a protocol agreement, ensuring no impacts on broadcast signals, which has been signed between 2rn and the Applicant, and is included as Appendix 15-5 of the EIAR. All identified telecommunications links and requested buffers are shown in Figure 15-23 in Chapter 15: Material Assets of the EIAR.

The Proposed Project will have a long-term, imperceptible, negative impact on the telecommunications signals of any operator, due to distance from or absence of any links in the area.

4.16 Cumulative Assessment

Concerns have been raised about the cumulative impact assessment undertaken within the EIAR.

Response

Cumulative effects of the Proposed Project are addressed in Section 3.3.8 of this document. Cumulative effects related to ornithology and biodiversity are detailed further in Sections 3.2.2, 3.5.5 and 4.9 of this document, cumulative noise concerns in Section 4.8 and **Appendix 2** of this document and landscape, visual and residential amenity in Section 3.5.3 of this document.

5.

CONCLUSION

MKO are of the view that the EIAR, NIS and accompanying documentation provide a comprehensive and robust basis for ACP to undertake its assessment of the Proposed Project. The Proposed Project has been informed by extensive multi-disciplinary surveys undertaken over several years, including numerous ground investigation and ecological surveys which have informed both the design and assessment of the Proposed Project and the conclusions of the EIAR and NIS. MKO remain satisfied that the submissions raised in respect of this application do not identify any clear deficiencies in the survey data, methodologies or assessments carried out which would alter the conclusions reached in the EIAR and NIS.

This Response to Submissions has addressed the observations made by Statutory Consultees and Third-Party Observers and demonstrates that the Proposed Project has been adequately assessed, with any adverse effects comprehensively considered and mitigated where necessary. There are no matters raised in the submissions which have not been considered and/or addressed through the planning application documentation, EIAR and NIS, or which cannot be adequately controlled by means of planning condition should the application be granted planning permission.

The Proposed Project is a strategically important renewable energy project that will make a substantial contribution to Ireland's energy security, renewable and climate objectives. In exercising its functions under the Climate Act, the Commission is required, insofar as practicable, to perform its functions in a manner consistent with the requirements of Section 15(1) of the Climate Act, including the furtherance of the national climate objective of 9GW of wind energy by 2030 and a renewable electricity share of 80% by 2030.

Furthermore, the Proposed Project will deliver a range of benefits including, but not limited to, supporting the transition to a low carbon climate resilient society, provide clean renewable energy to the national grid, helping to moderate energy costs over the long term, delivering a long-term positive impact on climate by offsetting of approximately 34,791 tonnes of carbon dioxide (CO₂) per annum and providing a significant positive benefit to the local community through the creation of sustainable local employment and the provision of a local Community Benefit Fund.

Having regard to the key points set out in this Response to Submissions, it is respectfully requested that the Commission give appropriate weight to the significant contribution that the Proposed Project will make towards Ireland's National Climate Objective and, having regard to the relevant international, European, national, regional and planning context that applies to the Proposed Project, grant permission for the Proposed Project as set out.



APPENDIX 1

***LIST OF THIRD-PARTY
OBSERVERS***

Name of Observer	Address	Themes Raised	Section Responding to Themes Raised
Angela Clancy	Illaunbaun, Miltown Malbay, Co. Clare	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
Anne & Martin McMohan	Clohanmore, Miltown Malbay, Co. Clare	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
Brendan O'Brien	Lackamore, Miltown Malbay, Co Clare	Landowner Consent and Reinstatement Bonds	Section 4.4
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Cumulative Assessment	Section 4.16
Brian & Amanda O'Callaghan	Ballynew, Miltown Malbay, Co. Clare, V95 VH66	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9

		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
Brian & Jenny McDowell	Fahanlunaghtamore, Miltown Malbay, Co. Clare V95 X3X2	Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Material Assets	Section 4.15
Brid Egan	Ballinoe, Miltown Malbay, Co. Clare	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
Brid & Jeffrey Foley	Illaunbaun, Lahinch, Co. Clare, V95 YX65	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12

		Landscape and Visual	Section 4.13
		Material Assets	Section 4.15
		Cumulative Assessment	Section 4.16
Bridget O'Brien	Knockliscrane, Miltown Malbay, Co Clare	Planning History	Section 4.2
		Landowner Consent and Reinstatement Bonds	Section 4.4
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Hydrology & Hydrogeology	Section 4.11
		Landscape and Visual	Section 4.13
		Material Assets	Section 4.15
Bridget & Thomas Gallagher	Cloneyogan, Lahinch, Co. Clare, V95 P2F1	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
Carlos Reyes (c/o Paddy Lafferty)	Letterkelly East, Miltown Malbay, Co. Clare	Population & Human Health	Section 4.7
		Ornithology	Section 4.9
		Hydrology & Hydrogeology	Section 4.11
		Landscape and Visual	Section 4.13
		Cultural Heritage	Section 4.14
		Cumulative Assessment	Section 4.16
Carmel O'Shanahan	Cloghaun More, Glendine, Co. Clare, V95 RK83	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10

		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
Cathal & Lisa MacMahon	Slievenalicka, Rockmount, Miltown Malbay, Co. Clare V95EP40	Planning History	Section 4.2
		Project Splitting	Section 4.3
		Landowner Consent and Reinstatement Bonds	Section 4.4
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Landscape and Visual	Section 4.13
		Cultural Heritage	Section 4.14
		Cumulative Assessment	Section 4.16
Cathryn Cawley	Claremoy Cottage, Moy, Co. Clare, V95 Y3F9	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
Chris & Martina Crowe	Leeds, Miltown Malbay, Co. Clare, V95 ED65	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11

		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
Dearbhail MacMahon	Gaoith Na Mara, Ballinoe, Miltown Malbay, Co. Clare	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Landscape and Visual	Section 4.13
		Cultural Heritage	Section 4.14
		Material Assets	Section 4.15
		Cumulative Assessment	Section 4.16
Delores & John Murphy	Clooneybreen, Rineen, Miltown Malbay, Co. Clare	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
Donal Buckley	Ballynew, Miltown Malbay, Co. Clare, V95 X440	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12

		Landscape and Visual	Section 4.13
		Material Assets	Section 4.15
		Cumulative Assessment	Section 4.16
Fergal MacMahon	Gaoith na Mara, Ballinoe, Miltown Malbay, Co. Clare, V95 X583	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Landowner Consent and Reinstatement Bonds	Section 4.4
		Site Selection & Reasonable Alternatives	Section 4.6
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
		Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
Frances Hennessy	6 Glenville, Moy, Lahinch, Co. Clare, V95 W2V6	Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
		Geology & Soils	Section 4.10
		Magheraboy, Killygordon, Co. Donegal	
Cllr Gary Doherty, Donegal County Council			
Geraldine Clancy	Illaunbaun, Miltown Malbay, Co. Clare	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8

		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
Gerry & Caroline Cleary	Kilcorcoran, Miltown Malbay, Co. Clare	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
		Noise and Vibration	Section 4.12
		Landscape and Visual	Section 4.13
		Cumulative Assessment	Section 4.16
Isabelle Brennan	Cloghaun More, Glendine, Co. Clare, V95 RK23	Planning Policy, Guidelines & Legislation	Section 4.1
		Planning History	Section 4.2
		Project Splitting	Section 4.3
		Population & Human Health	Section 4.7
		Biodiversity	Section 4.8
		Ornithology	Section 4.9
		Geology & Soils	Section 4.10
		Hydrology & Hydrogeology	Section 4.11
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		Cumulative Assessment	Section 4.16
Jacques Brennan	Cloghaun More, Glendine, Co. Clare, V95 RK23	Planning Policy, Guidelines & Legislation	Section 4.1
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Jemoke Murphy & Matthew Smith	Silverhill, Glendine, Miltown Malbay, Co Clare V95HP8K	Site Selection & Reasonable Alternatives	Section 4.6
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John & Brid O'Meara	Rockmount, Miltown Malbay, Co. Clare, V95 CX99	Planning Policy, Guidelines & Legislation	Section 4.1
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John & Clair Curtin	Clohanmore, Miltown Malbay, Co. Clare, V95 N7E5	Planning Policy, Guidelines & Legislation	Section 4.1
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John Cleary	Illaune, Miltown Malbay, Co. Clare, V95 AW08	Planning Policy, Guidelines & Legislation	Section 4.1
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John Flynn	Dambrest, Illaun, Miltown Malbay, Co. Clare, V95 NT4H	Planning Policy, Guidelines & Legislation	Section 4.1
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John Lynch	An tEalu, Rockmount, Miltown Malbay, Co. Clare V95 PY97	Population & Human Health	Section 4.7
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John O'Brien	Caherogan, Miltown Malbay, Co Clare	Planning History	Section 4.2
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Jutta Brassil	Cloonbony, Miltown Malbay, Co. Clare, V95 CD5F	Planning Policy, Guidelines & Legislation	Section 4.1
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Karl & Helen Geiss	Rockmount, Miltown Malbay, Co. Clare, V95 R7W9	Planning Policy, Guidelines & Legislation	Section 4.1
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Liam Blake	Rockmount, Miltown Malbay, Co. Clare	Planning Policy, Guidelines & Legislation	Section 4.1
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Máirín Gallagher	Cloneyogan, Lahinch, Co. Clare, V95 P2F1	Planning Policy, Guidelines & Legislation	Section 4.1
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Margaret Crowley	R474 (Eircodes V95F802 and V95X2K1), Co Clare	Public Consultation & Community Engagement	Section 4.5
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Marie & Andy Clancy	Illaunbaun, Miltown Malbay, Co. Clare, V95 AW98	Planning Policy, Guidelines & Legislation	Section 4.1
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Marie Killeen	Illaun, Miltown Malbay, County Clare	Population & Human Health	Section 4.7
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Marjorie Ahern	Rockmount, Miltown Malbay, Co. Clare	Planning Policy, Guidelines & Legislation	Section 4.1
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Martha Clancy	Illaunbaun, Miltown Malbay, Co. Clare, V95 CV40	Planning Policy, Guidelines & Legislation	Section 4.1
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Martin & Noreen Skerritt	Tooreen, Miltown Malbay, Co. Clare, V95 RR25	Planning Policy, Guidelines & Legislation	Section 4.1
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Martin O'Brien	Lackamore, Miltown Malbay, Co Clare	Planning History	Section 4.2
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Matt & Maureen Gleeson	Ballinoe, Miltown Malbay, Co. Clare, V95 RQ60	Planning Policy, Guidelines & Legislation	Section 4.1
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Maureen, John & Family McMahon	Bayview, Ballinoe, Miltown Malbay, County Clare V95 YNE2	Population & Human Health	Section 4.7
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Michael Conway	Ballinoe, Miltown Malbay, Co. Clare / 73 St. Anthony Avenue, Nanuet, NY 10954	Planning Policy, Guidelines & Legislation	Section 4.1
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Michael McDonagh	Ennis Road, Miltown Malbay, Co. Clare, V95 P2K6	Planning Policy, Guidelines & Legislation	Section 4.1
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Michael Murray & Geraldine O'Looney	Fintra Mor, Miltown Malbay, Co Clare V95 N702	Landowner Consent and Reinstatement Bonds	Section 4.4
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Michelle Flynn & John Jordan	Illaun, Miltown Malbay, Co. Clare	Planning Policy, Guidelines & Legislation	Section 4.1
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Miltown Malbay Windfarm Opposition Group (per Laura MacMahon)	c/o Laura MacMahon, Ballinoe, Miltown Malbay, Co Clare V95E3Y9	Planning Policy, Guidelines & Legislation	Section 4.1
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Noel and Caroline Hayes	Toor, Miltown Malbay, Co. Clare, V95 DE24	Planning Policy, Guidelines & Legislation	Section 4.1
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Nora O'Brien	Knockliscrane, Miltown Malbay, Co Clare	Cumulative Assessment	Section 4.16
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Patricia Flanagan	4 Glenville, Moy, Lahinch, Co. Clare	Planning Policy, Guidelines & Legislation	Section 4.1
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Patrick Conway	Ballinoe, Miltown Malbay, Co. Clare / 120 Elizabeth St., Pearl River, NY 10965	Planning Policy, Guidelines & Legislation	Section 4.1
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Patrick & Gerardine Lafferty	Boolynamiscaune, Miltown Malbay, Co Clare	Planning History	Section 4.2
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Patrick & Laura MacMahon	Ballinoe, Miltown Malbay, Co Clare V95E3Y9	Cumulative Assessment	Section 4.16
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Paul Carkill	Clooneen, Kilfenora, Co. Clare, V95 W9X9	Planning Policy, Guidelines & Legislation	Section 4.1
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Peadar Hennessy	Leagard Nth, Miltown Malbay, Co. Clare, V95 T1W4	Planning Policy, Guidelines & Legislation	Section 4.1
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Peter & Concellia Fee	Lackamore, Miltown Malbay, Co. Clare, V95 P9C4	Planning Policy, Guidelines & Legislation	Section 4.1
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Peter Griffin	Inagh Road, Miltown Malbay, Co. Clare, V95 K766	Planning Policy, Guidelines & Legislation	Section 4.1
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Peter McNamara	Illaunbaun, Lahinch, Co. Clare, V95 EF20	Planning Policy, Guidelines & Legislation	Section 4.1
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Sean and Mary O'Malley	Ballinoe, Miltown Malbay, Co. Clare, V95 CD93	Planning Policy, Guidelines & Legislation	Section 4.1
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Sean & Anne Hennessy	Tooreen, Miltown Malbay, Co. Clare	Planning Policy, Guidelines & Legislation	Section 4.1
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Sean Lynch	Illaunbaun, Miltown Malbay, County Clare, V95 CV40	Planning Policy, Guidelines & Legislation	Section 4.1
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Sinead, Roisin & Padraig Lafferty	Letterkelly, Miltown Malbay, Co Clare	Planning History	Section 4.2
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Stephanie Hennessy	Leagard Nth, Miltown Malbay, Co. Clare, V95 7N51	Planning Policy, Guidelines & Legislation	Section 4.1
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Susan Crawford	Cloonbony, Miltown Malbay, Co. Clare, V95 T2G6	Planning Policy, Guidelines & Legislation	Section 4.1
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Terence O'Brien	Knockliscrane, Miltown Malbay, Co Clare	Planning Policy, Guidelines & Legislation	Section 4.1
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Teresa & John Joe Carkill	Clooneen, Kilfenora, Co. Clare, V95 W9X9	Planning Policy, Guidelines & Legislation	Section 4.1
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Thomas, Anne & Brian O'Halloran	Boolyduff, Inagh, Co. Clare	Planning History	Section 4.2
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APPENDIX 2

**AWN NOISE AND VIBRATION
RESPONSE TO SUBMISSIONS**



Trinity
Consultants



awnconsulting

PROJECT

Slieveacurry Renewable Energy Development, Co. Clare

SUBJECT

Response to Submissions

DOCUMENT

REFERENCE

247501.0611NT01

DATE

14 August 2026

WRITTEN BY

APPROVED BY

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Senior Acoustic Consultant

Disclaimer

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1. INTRODUCTION

AWN Consulting Ltd (AWN), a Trinity Consultants company, are acoustic consultants for the Slieveacurry Renewable Energy Development (An Coimisiún Pleanála Reference ACP-324270-26) and prepared Chapter 12 (Noise and Vibration) of the submitted Environmental Impact Assessment Report (EIAR).

AWN has been requested to respond to concerns raised in relation to Noise and Vibration in submissions on the Proposed Project. This document provides appropriate responses to claims made in the submissions to An Coimisiún Pleanála (ACP).

This document has been prepared by Dermot Blunnie. Dermot is an Associate Director (Acoustics) at AWN. He holds a BEng (Hons) in Sound Engineering, MSc in Applied Acoustics and has completed the Institute of Acoustics (IOA) Diploma in Acoustics and Noise Control. Dermot is a member of the Institute of Engineers Ireland (MIEI) and the Institute of Acoustics (MIOA) and has over 17 years' experience in the field of acoustics. He has extensive knowledge and experience in relation to commissioning noise monitoring and impact assessment of wind turbine noise as well as a detailed knowledge of acoustic standards and proprietary noise modelling software packages. He has commissioned noise surveys and has completed noise impact assessments for numerous wind farm projects within Ireland.

Section 2 of this document summarises the key noise-related issues identified in the submissions and provides response to each.

2. SUMMARY OF THE KEY POINTS

The following is a list of the key topics raised which are attributed to noise and vibration.

- ▶ Turbine Set Back Distances
- ▶ Turbine Spacing and Wake Turbulence
- ▶ Background Noise Survey Methodology
- ▶ Turbine Noise Assessment
- ▶ Amplitude Modulation
- ▶ Low Frequency Noise / Infrasound
- ▶ Substation Noise Assessment
- ▶ Assessment of Derelict Dwellings
- ▶ EIA Significance Rating
- ▶ Slievecallan Wind Farm Noise Compliance

The key observations / submissions relating to noise and vibration have been identified and included in a report prepared by Huson & Associates which has been commissioned on behalf of the *Miltown Malbay Windfarm Opposition Group* and included within submissions on the Proposed Project.

Each of these items are addressed under specific sub-headings in Section 3.

3. RESPONSE TO SUBMISSIONS

3.1 Turbine Set Back Distances

Submissions claim that the setback distance for the Proposed Turbines should be 10 times the rotor diameter of the turbines, or 1.5km setback distance to Noise Sensitive Locations (NSLs) for a turbine with a rotor diameter of 150m.

Chapter 12 of the submitted EIAR does not specifically address turbine setback distances, as these do not form the basis of the operational noise assessment. There is no single separation distance that can reliably demonstrate acceptable wind turbine noise levels at noise-sensitive locations. Operational noise effects have therefore been assessed through project-specific noise modelling, with predicted turbine noise levels compared against the applicable noise criteria at each location. Assessment against these criteria, rather than against a prescribed setback distance, provides an appropriate and robust assessment of operational noise in line with best-practice guidance. The applicable guidance and adopted methodology are described in Sections 12.3.5 and 12.4.4 of the submitted EIAR.

3.2 Turbine Spacing and Wake Turbulence

Submissions claim that the Proposed Turbines are too close together will produce increased wake turbulence that raises noise emissions and risk of amplitude modulation and that the Noise and Vibration Assessment has not considered the wake turbulence and wake effects.

Chapter 12 of the submitted EIAR does not specifically assess turbine spacing or wake effects as separate operational noise considerations, as these do not form the basis of the adopted noise assessment methodology. The applicable guidance and adopted methodology, described in Sections 12.3.5 and 12.4.4 of the submitted EIAR, are robust and in line with best-practice guidance. The guidelines applicable to the assessment of wind turbine noise do not specifically address turbine spacing or wake effects. Turbine spacing and aerodynamic wake effects are principally matters relating to turbine layout design, energy yield and turbine performance and do not form the basis of the operational noise assessment.

As stated in Section 12.3.5.11.2 of the EIAR, *"As per the discussion on the research presented previously in this Section, excessive/other AM is considered an atypical phenomenon, and the duration, conditions and specific location or locations at which it presents cannot be predicted in the planning stage. For these reasons, the assessment of AM is typically triggered in response to complaints where the contributing factors aligning to the period of the complaint such as meteorological conditions and turbine operations can be investigated."*

3.3 Background Noise Survey Methodology

Submissions claim that the noise and vibration assessment of the submitted EIAR did not account for contribution of existing wind turbine noise in the assessment of the background noise level for the Proposed Project and question the methodology used.

As stated in Section 12.4.2 of the EIAR *"All measurement data collected during the background noise surveys has been carried out in accordance with the Institute to Acoustic's Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise (IoA GPG, 2013) and accompanying, Supplementary Guidance Note 1: Data Collection (2014)."*

Section 12.4.2.1 of the EIAR also states: *"At some locations, noise from the operation of the Slieveacurry Wind Turbines was audible to varying degrees depending on the conditions (wind speed and direction) and distance. It is important to note that any noise from the existing wind turbine in the area should not form part of the background noise environment at noise sensitive locations. Steps have been taken to*

remove any turbine noise from Slieveacallan Wind Farm in the analysis of the background noise data, as required by Section 5.2.3 of the IOA GPG. These methods are discussed in detail in Section 12.4.2.5."

Section 12.4.2.5 of the EIAR states: "*Two methods were adopted in the assessment, directional filtering and subtracting the predicted existing turbine noise levels from the measured data sets. Details of the method applied at each location are discussed in Section 12.5.1 along with the results of the assessment.*"

The sections listed below describe in detail how the assessment methodology to remove contribution of existing wind turbine was applied:

- ▶ Section 12.5.1.1: Location A
- ▶ Section 12.5.1.2: Location B
- ▶ Section 12.5.1.3: Location C
- ▶ Section 12.5.1.4: Location D
- ▶ Section 12.5.1.5: Location E

The assessment presented in Chapter 12 of the EIAR is considered robust, transparent and fully in line with best practice guidance for deriving the background noise levels to inform the assessment of wind turbine noise.

3.4 Turbine Noise Assessment Methodology

Submissions question the adopted operational noise assessment methodology contained in the submitted EIAR. Specific reference is made to the Wind Energy Development Guidelines, the noise prediction calculations and settings for valley corrections ('Escarpment Sound Reflections').

The methodology adopted for the assessment of wind turbine noise in the EIAR is in accordance with the applicable guidelines contained in the Wind Energy Development Guidelines for Planning Authorities, 2006 (the Guidelines (DoEHLG, 2006)), and supported by best practice guidance for the assessment of wind turbine noise, namely, A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Turbine Noise (2013) and its supplementary Guidance Notes (2014) (IOA GPG). Full details of guidance documents referenced for the assessment of operational wind turbine noise are presented in Section 12.3.5 of the EIAR.

The operational noise calculations described in Section 12.4.4 of the EIAR and the supporting information in Appendix 12.3 describe the methodology used for the calculation prediction and assessment of wind turbine noise. The following statement is reiterated from Appendix 12.3: "*In the IOA GPG, section 4.3.11 the following is stated: Topographic screening effects of the terrain (ISO 9613-2, Equation 12) should be limited to a reduction of no more than 2 dB, and then only if there is no direct line of sight between the highest point on the turbine rotor and the receiver location.' The modelling software takes account of these limitations on the degree of screening from terrain. The "valley correction" from section 4.3.9 of the IOA GPG is also applied where relevant.*"

Submissions state that alternative calculation settings and assessment methodologies would result in higher predicted turbine noise levels and, consequently, exceedances of the applicable criteria. However, adopting these alternative approaches would represent a significant departure from the applicable guidance and established best-practice methodologies for assessing wind turbine noise in Ireland.

It is acknowledged that an update to ETSU-R-97, *Assessment and Rating of Wind Turbine Noise*, was published by the UK Department for Energy Security and Net Zero on 19 June 2026, following submission of the EIAR.

The updated guidance retains the core methodology of the original ETSU-R-97 for the assessment of noise from wind farm developments. Notwithstanding the updated UK Guidance, the references to ETSU-R-97 within Chapter 12 of the submitted EIAR remain applicable and consistent with current best practice guidance. Baseline noise data collected in accordance with the IOA GPG are unaffected and remain valid for the purposes of the assessment presented in the EIAR. The Guidelines (DoEHLG, 2006) continue to apply as the noise criteria applicable at receptors for proposed wind farms in Ireland.

The assessment methodology, baseline noise surveys, data applicable turbine noise criteria, and the conclusions of the noise assessment presented in Chapter 12 of the EIAR remain valid and consistent with current best practice and applicable guidance.

3.5 Amplitude Modulation

Submissions claim that Amplitude Modulation will arise from the operation of the Proposed Project and that the issue has not been assessed in the EIAR.

As stated in Section 12.3.5.11.2 of the EIAR it is not possible to predict Amplitude Modulation (AM) at the planning stage.

Sections 12.3.5.11 of the EIAR address the potential for AM from the operation of the Proposed Turbines. In addition to this, Section 12.7.4.1.1 of the EIAR confirms commitments by the Applicant to 'investigate complaints indicating potential excessive amplitude modulation associated with the Proposed Project'. The following statement is reiterated from Section 12.7.5.1 of the EIAR "*In the event of a complaint associated with noise for example, tonality or amplitude modulation from the proposed project, as discussed in Section 12.7.4.1.1 and in line with the NCMP documents to be submitted and agreed with the local authority), the operator will fully investigate the complaint in collaboration with the turbine manufacturer, through review of the meteorological periods and conditions.*"

The Applicant has committed that, 'prior to the commissioning of the wind farm; the developer will submit a Noise Compliance Monitoring Programme (NCMP) to the planning authority for written agreement. The NCMP will include detailed methodologies for noise measurements, procedures for recording results, and a protocol for managing complaints in accordance with the most up to date guidance, standards, and industry best practice. It is standard procedure for such details to be agreed through the planning condition compliance process'. In addition, Appendix 12.8 of the EIAR provides a detailed draft Protocol for Managing complaints relating to AM and tonality

3.6 Low Frequency Noise / Infrasound

Submissions claim that impacts from low frequency noise and infrasound were not considered or assessed in Chapter 12 the EIAR.

Section 12.3.5.9 of the EIAR presents a discussion on the evidence for low frequency noise and infrasound associated with the operation of wind turbines. The EIAR confirmed that 'low frequency noise and infrasound associated with wind turbines is expected to be below perceptibility thresholds and are not likely to result in any significant effects at NSLs.' The EIAR has considered the potential for low frequency noise and infrasound associated with wind turbine noise.

3.7 Substation Noise Assessment

Submissions claim that chapter 12 of the EIAR is deficient as it does not provide noise predictions for the substation, deferring to future detailed design. It also claims that the substation noise is typically tonal and should be assessed against a 35 dB L_{Ar} criterion.

Section 12.3.6.1 presents a detail discussion on the derived appropriate noise limits for the proposed extension to the existing substation. Section 12.5.3 confirms the noise criteria and specifically addresses

the acoustic characteristic tonality, "An absolute threshold of 35 dB L_{Aeq} for fixed plant. During the detailed design, acoustic features such as tonality, impulsivity and intermittency, will be considered in the context of the character assessment framework contained in BS 4142. Where these acoustic features are present, the Rating Level should be controlled to avoid adverse impacts at NSLs in accordance with BS 4142. Where background noise levels are elevated at specific NSLs, i.e. greater than 30 dB L_{A90} , a higher absolute threshold, of up to 5 dB above the background level, may be acceptable. With respect to the guidance from the BS4142 standard, as discussed in Section 12.3.5.12, it is considered that the proposed criteria are robust and are expected to prevent adverse impacts at NSLs."

Section 12.6.3.2.1 of the EIAR presents details of the noise prediction calculations undertaken for the substation which demonstrate that the predicted noise at the nearest NSL is within the criteria set out by 'Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities 2016' (NG4) and BS 4142.

The assessment presented in Chapter 12 of the EIAR is considered robust and in line with best practice guidance. Consideration has been given to the potential issue of tonality; it is confirmed and clarified that, as the detailed design progresses, careful consideration will be given to the selection of mechanical and electrical plant to ensure that noise emissions comply with the proposed criteria and that any character corrections are appropriately addressed in accordance with the requirements outlined in Section 12.3.6 of the EIAR.

3.8 Assessment of Derelict Dwellings

Submissions note that a limit of 55 dB is presented in Appendix 12.5 for properties listed as derelict and claims that properties listed as derelict (H005, H034, H035, H045, H046, H199, H206, H207, H209) should be considered as NSLs with limits applied as per the Guidelines (DoEHLG, 2006).

The inclusion of a 55 dB L_{A90} limit against these properties in Appendix 12.5 of the EIAR was an error in the tabulated results. This is evident as no corresponding operational turbine noise limit of 55 dB L_{A90} is identified or applied in Chapter 12.

The properties confirmed as derelict, namely H005, H034, H035, H045, H046, H199, H206, H207, and H209, do not meet the definition of a Noise Sensitive Location (NSL) applied in the assessment. The Guidelines (DoEHLG, 2006) define a residential NSL as an 'occupied dwelling house'. Consistent with the Guidelines and the assessment methodology set out in Chapter 12 of the EIAR, these derelict properties were therefore not assessed as NSLs and no turbine noise limit should have been assigned. An updated and corrected table of results is presented in Appendix A of this document.

3.9 EIA Significance Rating

Submissions claim that the assessment of significance of the noise and vibration effects presented in Chapter 12 of the EIAR is not accurate and that the noise and vibration effects should be classified as Very Significant to Profound.

The assessment of significance is addressed in Section 12.3.1 of the EIAR. The significance of the effect associated with noise and vibration of the Proposed Project is described throughout chapter 12 of the submitted EIAR.

With respect to the operational turbine noise the significance of effects are described in Section 12.6.3.1.1 and Section 12.8.2.1 of the EIAR. The effects associated with wind turbine noise are described as Not Significant. The alternative significance ratings suggested in the submissions are derived from alternative assumptions and criteria which are not those adopted in Chapter 12 of the EIAR and are not consistent with the assessment approach set out in current guidance.

3.10 Slievecallan Wind Farm Non-Compliance

Submissions allege based on measurements undertaken by Huson and Associates at a specific location (Eircode V95PNX2), that the existing operational Slievecallan wind farm is not within its planning condition for noise.

The assessment undertaken in Chapter 12 of the EIAR for the Proposed Project has considered the cumulative contribution for existing Slievecallan Wind Farm and the proposed Illaunbaun Wind Farm. The methodology adopted for the assessment of wind turbine noise in the EIAR is in accordance with the applicable guidelines contained in the Guidelines (DoEHLG, 2006), and supported by best practice guidance for the assessment of wind turbine noise, namely, A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Turbine Noise (2013) and its supplementary Guidance Notes (2014) (IOA GPG). Full details of guidance documents referenced for the assessment of operational wind turbine noise are presented in Section 12.3.5 of the EIAR.

The proposed turbine noise limits are outlined in Section 12.5.2 of the EIAR. These limits have been derived in accordance with the applicable guidance and are proposed as cumulative turbine noise limits for all existing and permitted turbines. The existing Slievecallan Wind Farm is subject to an operational noise condition that controls noise from the Slievecallan turbines in isolation. That condition does not establish cumulative turbine noise limits.

Compliance or non-compliance by another wind farm development with its planning condition is a separate matter and does not alter the methodology adopted for assessing the Proposed Project in Chapter 12 of the EIAR. It is not appropriate for AWN to comment here on allegations relating to another wind farm development. However, insofar as the claim may have implications for the assessment of the Proposed Project, it is noted that the measurement methodology used to determine operational noise from the Slievecallan turbines contained within the submissions is not considered to be in line with the best-practice methodology for demonstrating compliance with conditioned noise limits, as set out in the IOA GPG and Supplementary Guidance Note 5: Post Completion Measurements (July 2014).

The assumptions and input data adopted in Chapter 12 of the submitted EIAR for the existing Slievecallan turbines are based on published technical data for the turbine model installed at Slievecallan, and the assessment is considered to be robust.

4. CONCLUSION

This document has been prepared in response to concerns relating to noise and vibration raised in submissions on the Proposed Project. The key noise-related issues identified in the submissions have been summarised and are addressed in detail in Section 3 of this document, under the sub-headings:

- ▶ Turbine Set Back Distances
- ▶ Turbine Spacing and Wake Turbulence
- ▶ Background Noise Survey Methodology
- ▶ Turbine Noise Assessment
- ▶ Amplitude Modulation
- ▶ Low Frequency Noise / Infrasound
- ▶ Substation Noise Assessment
- ▶ Assessment of Derelict Dwellings
- ▶ EIA Significance Rating
- ▶ Slievecallan Wind Farm Noise Compliance

Appropriate clarifications and further commentary are provided to address the claims made within the submissions, and to clarify, expand upon, and reiterate the relevant statements contained in the submitted EIAR.

The Noise and Vibration Assessment presented within Chapter 12 of the EIAR is robust and has been completed in accordance with the most up-to-date applicable guidelines, best-practice guidance, and relevant standards. The assessment demonstrates that the Proposed Project can operate within the noise criteria derived from applicable guidelines and best practice standards and that the resulting operational noise effects are Not Significant.

APPENDIX A (12-5) PREDICTED NOISE LEVELS

NSL Ref	NML Assigned	Parameter	Predicted Omni-directional Cumulative Turbine Noise Level dB LA90 at Standardised Wind Speed at 10m						
			3	4	5	6	7	8	9
H001		Predicted	26.1	29.2	33.4	36.8	37.7	37.9	37.9
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H002		Predicted	30.9	32.2	36.4	39.7	41.2	41.4	41.4
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H003		Predicted	30.1	31.8	36.0	39.4	40.7	41.0	41.0
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H004		Predicted	31.9	33.1	37.3	40.6	42.1	42.4	42.4
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H005		Predicted	31.6	33.2	37.4	40.8	42.2	42.4	42.4
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H006		Predicted	32.3	33.7	37.9	41.3	42.7	43.0	43.0
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H008		Predicted	32.4	33.8	38.0	41.4	42.8	43.1	43.1
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	0.1	0.1
H009		Predicted	24.4	27.6	31.7	35.0	36.0	36.3	36.3
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H010		Predicted	32.5	33.4	37.7	41.0	42.6	42.9	42.9

		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H011		Predicted	33.8	34.8	39.0	42.4	43.9	44.2	44.2
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	0.9	1.2	1.2
H012		Predicted	30.8	32.8	37.0	40.4	41.7	41.9	41.9
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H013		Predicted	28.7	30.6	34.8	38.2	39.5	39.7	39.7
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H014		Predicted	28.6	30.4	34.7	38.0	39.3	39.6	39.6
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H015		Predicted	29.6	32.5	36.7	40.2	41.2	41.4	41.4
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	0.2	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H016		Predicted	28.8	31.5	35.7	39.1	40.2	40.4	40.4
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H017		Predicted	24.5	28.0	31.9	35.2	36.2	36.5	36.5
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H018		Predicted	28.8	31.6	35.8	39.3	40.3	40.5	40.5
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H019		Predicted	29.0	31.8	36.1	39.5	40.5	40.7	40.7
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--

		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H020		Predicted	29.1	32.0	36.3	39.7	40.7	40.9	40.9
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H021		Predicted	30.2	32.9	37.2	40.6	41.6	41.8	41.8
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H022		Predicted	27.4	30.9	34.9	38.2	39.2	39.4	39.4
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H023		Predicted	28.4	31.9	36.0	39.3	40.2	40.5	40.5
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H024		Predicted	24.2	27.2	31.3	34.7	35.7	35.9	35.9
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H025		Predicted	24.2	27.5	31.5	34.8	35.8	36.1	36.1
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H026		Predicted	29.0	30.8	35.1	38.5	39.8	40.0	40.0
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H028		Predicted	26.4	30.0	33.9	37.1	38.1	38.4	38.4
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	School	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H029		Predicted	24.5	28.0	31.9	35.1	36.1	36.4	36.4
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--

H030		Predicted	26.6	30.2	34.1	37.4	38.3	38.6	38.6
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Church	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H031		Predicted	33.3	37.2	40.8	43.9	44.9	45.3	45.3
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	0.3	0.3
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	0.3	0.3
H032		Predicted	28.6	32.2	35.8	38.9	40.0	40.4	40.4
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H033		Predicted	30.8	34.1	38.3	41.8	42.7	42.8	42.8
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H034		Predicted	28.9	32.4	36.2	39.4	40.4	40.8	40.8
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H035		Predicted	29.6	33.2	37.2	40.5	41.4	41.7	41.7
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H036		Predicted	27.5	31.2	35.0	38.3	39.2	39.5	39.5
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H037		Predicted	28.6	32.4	36.1	39.3	40.3	40.6	40.6
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H038		Predicted	29.3	33.0	36.8	40.0	41.0	41.3	41.3
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H039		Predicted	31.1	34.8	38.7	42.0	42.9	43.2	43.2
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0

	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	0.2	0.2
H040		Predicted	30.8	34.4	38.4	41.6	42.6	42.8	42.8
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H041		Predicted	30.5	34.4	38.1	41.2	42.2	42.6	42.6
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H042		Predicted	30.6	34.4	38.2	41.3	42.3	42.7	42.7
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H043		Predicted	31.8	35.6	39.3	42.4	43.4	43.8	43.8
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H044		Predicted	31.8	35.6	39.3	42.4	43.4	43.8	43.8
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H045		Predicted	32.1	35.9	39.6	42.7	43.7	44.1	44.1
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H046		Predicted	32.9	36.7	40.4	43.6	44.5	44.9	44.9
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H047		Predicted	31.5	35.3	39.0	42.1	43.0	43.5	43.5
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H048		Predicted	32.8	36.6	40.2	43.4	44.3	44.8	44.8
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0

		Night-time Excess	--	--	--	--	--	--	--
H049		Predicted	31.1	35.0	38.6	41.7	42.7	43.1	43.1
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H050		Predicted	31.0	34.8	38.4	41.6	42.5	43.0	43.0
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H051		Predicted	29.7	33.5	37.1	40.3	41.3	41.7	41.7
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H052		Predicted	29.3	33.1	36.7	39.8	40.9	41.3	41.3
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H053		Predicted	28.9	32.6	36.3	39.4	40.4	40.8	40.8
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H054		Predicted	28.7	32.3	36.0	39.1	40.1	40.6	40.6
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H055		Predicted	27.8	31.4	35.1	38.2	39.3	39.7	39.7
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H056		Predicted	29.0	32.5	36.3	39.5	40.5	40.9	40.9
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H057		Predicted	29.2	32.7	36.5	39.8	40.8	41.1	41.1
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H058		Predicted	29.4	32.9	36.7	40.0	41.0	41.4	41.4

		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H059		Predicted	26.9	29.8	33.8	37.2	38.3	38.6	38.6
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H060		Predicted	26.7	30.2	33.8	37.0	38.1	38.5	38.5
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H061		Predicted	28.2	31.0	35.2	38.6	39.7	39.9	39.9
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H062		Predicted	26.8	29.5	33.6	37.0	38.1	38.3	38.3
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H063		Predicted	25.9	28.4	32.6	35.9	37.1	37.3	37.3
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H064		Predicted	24.6	27.6	31.7	35.0	36.1	36.3	36.3
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H065		Predicted	25.2	27.8	31.9	35.2	36.4	36.6	36.6
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H066		Predicted	24.7	27.7	31.9	35.2	36.2	36.5	36.5
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H067		Predicted	27.4	30.7	34.9	38.3	39.3	39.4	39.4
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--

		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H068		Predicted	25.5	26.7	30.9	34.3	35.8	36.0	36.0
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H069		Predicted	26.2	27.4	31.6	35.0	36.5	36.7	36.7
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H070		Predicted	25.8	27.3	31.5	34.8	36.2	36.5	36.5
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H071		Predicted	24.4	26.0	30.2	33.6	35.0	35.2	35.2
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H072		Predicted	25.1	27.6	31.8	35.1	36.2	36.5	36.5
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H073		Predicted	24.1	27.6	31.5	34.7	35.7	36.0	36.0
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H074		Predicted	24.5	28.0	31.9	35.1	36.1	36.4	36.4
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H075		Predicted	24.4	27.9	31.8	35.0	36.0	36.3	36.3
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H076		Predicted	24.7	28.3	32.2	35.4	36.4	36.7	36.7
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--

H077		Predicted	25.2	28.8	32.7	36.0	36.9	37.2	37.2
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H078		Predicted	25.5	29.1	33.0	36.2	37.2	37.5	37.5
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H079		Predicted	26.2	29.9	33.7	36.9	37.8	38.2	38.2
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H080		Predicted	28.8	32.4	35.9	39.0	40.1	40.6	40.6
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H081		Predicted	27.0	30.3	33.9	37.1	38.2	38.7	38.7
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H082		Predicted	26.8	30.2	33.8	36.9	38.1	38.5	38.5
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H083		Predicted	27.5	30.9	34.6	37.7	38.8	39.2	39.2
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H084		Predicted	26.4	29.8	33.4	36.5	37.6	38.1	38.1
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H085		Predicted	26.1	29.5	33.1	36.3	37.4	37.8	37.8
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H086		Predicted	25.2	28.6	32.2	35.3	36.4	36.9	36.9
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0

	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H088		Predicted	25.2	28.4	32.0	35.2	36.4	36.8	36.8
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H089		Predicted	26.1	29.2	32.8	36.0	37.2	37.6	37.6
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H090		Predicted	24.9	28.0	31.7	34.9	36.0	36.5	36.5
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H091		Predicted	24.5	27.6	31.2	34.4	35.6	36.0	36.0
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H092		Predicted	24.4	27.5	31.1	34.2	35.4	35.9	35.9
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H093		Predicted	24.5	27.5	31.3	34.5	35.6	36.0	36.0
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H094		Predicted	24.7	27.5	31.4	34.6	35.8	36.1	36.1
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H095		Predicted	24.3	26.7	30.7	34.0	35.2	35.5	35.5
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H096		Predicted	23.8	26.8	30.4	33.6	34.8	35.2	35.2
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0

		Night-time Excess	--	--	--	--	--	--	--
H097		Predicted	23.6	26.6	30.2	33.4	34.6	35.1	35.1
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H098		Predicted	23.3	26.2	29.9	33.1	34.3	34.7	34.7
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H099		Predicted	23.5	26.4	30.1	33.3	34.5	34.9	34.9
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H100		Predicted	23.7	26.1	30.1	33.4	34.6	34.9	34.9
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H101		Predicted	25.9	27.4	31.6	34.8	36.3	36.6	36.6
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H102		Predicted	26.6	28.4	32.5	35.8	37.2	37.5	37.5
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H103		Predicted	26.9	28.7	32.8	36.2	37.5	37.8	37.8
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H104		Predicted	27.0	28.9	33.0	36.3	37.6	37.9	37.9
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H105		Predicted	27.7	29.7	33.8	37.1	38.4	38.7	38.7
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H106		Predicted	27.7	29.6	33.7	37.0	38.4	38.6	38.6

		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H107		Predicted	27.2	29.0	33.1	36.4	37.8	38.1	38.1
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H108		Predicted	27.4	29.2	33.4	36.7	38.0	38.3	38.3
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H109		Predicted	27.6	29.2	33.3	36.6	38.0	38.3	38.3
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H110		Predicted	27.9	29.6	33.7	37.0	38.4	38.7	38.7
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H111		Predicted	28.2	29.9	34.0	37.4	38.7	39.0	39.0
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H112		Predicted	28.4	30.1	34.2	37.6	38.9	39.2	39.2
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H113		Predicted	28.5	30.2	34.4	37.7	39.1	39.3	39.3
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H114		Predicted	28.6	30.2	34.4	37.7	39.1	39.4	39.4
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H115		Predicted	30.3	31.3	35.5	38.9	40.4	40.7	40.7
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--

		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H116		Predicted	29.5	31.0	35.2	38.5	39.9	40.2	40.2
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H117		Predicted	30.3	31.6	35.8	39.1	40.6	40.9	40.9
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H118		Predicted	30.4	31.8	36.0	39.3	40.7	41.0	41.0
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H119		Predicted	30.7	32.0	36.2	39.5	41.0	41.3	41.3
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H120		Predicted	25.0	26.6	30.8	34.1	35.5	35.8	35.8
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H121		Predicted	23.4	27.0	30.8	34.0	35.0	35.4	35.4
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H122		Predicted	26.9	30.3	33.9	37.1	38.2	38.6	38.6
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H123		Predicted	22.8	25.2	29.0	32.3	33.6	34.0	34.0
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H124		Predicted	24.0	26.7	30.5	33.7	35.0	35.3	35.3
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--

H125		Predicted	22.9	26.2	30.1	33.4	34.4	34.7	34.7
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H126		Predicted	22.8	26.0	30.0	33.3	34.3	34.6	34.6
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H127		Predicted	23.3	26.5	30.6	33.9	34.9	35.1	35.1
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H128		Predicted	22.8	26.4	30.2	33.4	34.4	34.7	34.7
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H129		Predicted	22.8	26.4	30.2	33.4	34.4	34.8	34.8
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H130		Predicted	22.7	26.3	30.1	33.3	34.3	34.6	34.6
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H131		Predicted	25.7	29.5	33.2	36.4	37.4	37.8	37.8
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H132		Predicted	25.5	29.3	33.0	36.2	37.2	37.5	37.5
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H133		Predicted	25.7	29.4	33.2	36.3	37.3	37.7	37.7
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H134		Predicted	30.1	33.9	37.6	40.7	41.7	42.1	42.1
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0

	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H135		Predicted	22.7	26.3	30.1	33.3	34.3	34.7	34.7
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H136		Predicted	26.8	30.5	34.3	37.5	38.5	38.8	38.8
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H137		Predicted	27.2	31.0	34.7	37.9	38.9	39.2	39.2
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H138		Predicted	23.5	26.6	30.6	34.0	35.0	35.2	35.2
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H139		Predicted	25.0	27.5	31.6	35.0	36.1	36.4	36.4
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H140		Predicted	30.1	31.0	35.2	38.5	40.1	40.4	40.4
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H141		Predicted	30.1	30.9	35.2	38.5	40.1	40.4	40.4
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H142		Predicted	30.3	31.1	35.3	38.6	40.3	40.5	40.5
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H143		Predicted	29.8	30.6	34.8	38.2	39.8	40.1	40.1
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0

		Night-time Excess	--	--	--	--	--	--	--
H144		Predicted	29.8	30.7	34.9	38.2	39.8	40.1	40.1
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H145		Predicted	29.8	30.6	34.8	38.1	39.7	40.0	40.0
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H146		Predicted	29.9	30.7	34.9	38.2	39.8	40.1	40.1
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H147		Predicted	25.0	28.1	31.8	35.0	36.1	36.6	36.6
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H148		Predicted	27.6	31.0	34.5	37.7	38.8	39.3	39.3
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H149		Predicted	25.6	28.7	32.2	35.4	36.6	37.1	37.1
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H150		Predicted	25.9	29.0	32.6	35.7	37.0	37.4	37.4
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H151		Predicted	31.0	34.9	38.5	41.5	42.5	43.0	43.0
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H152		Predicted	24.2	26.5	30.5	33.8	35.0	35.3	35.3
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H153		Predicted	27.6	31.5	35.1	38.1	39.1	39.6	39.6

		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H154		Predicted	26.4	30.3	34.0	37.1	38.0	38.5	38.5
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H155		Predicted	25.2	26.9	31.0	34.2	35.6	36.0	36.0
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H156		Predicted	26.1	27.7	31.8	35.1	36.5	36.8	36.8
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H157		Predicted	25.5	29.2	33.0	36.1	37.1	37.5	37.5
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H158		Predicted	25.4	29.2	33.0	36.1	37.1	37.4	37.4
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H159		Predicted	23.6	27.4	31.2	34.3	35.3	35.7	35.7
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H160		Predicted	28.0	29.1	33.2	36.6	38.1	38.4	38.4
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H161		Predicted	27.9	28.6	32.9	36.2	37.8	38.1	38.1
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H162		Predicted	28.2	29.1	33.3	36.6	38.2	38.5	38.5
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--

		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H163	E	Predicted	30.0	30.6	34.9	38.2	39.9	40.2	40.2
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
		Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H164	A	Predicted	21.2	24.8	28.7	31.9	32.8	33.2	33.2
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
		Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H165	A	Predicted	21.4	25.0	28.8	32.0	33.0	33.4	33.4
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
		Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H166	A	Predicted	21.9	25.5	29.4	32.6	33.5	33.9	33.9
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
		Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H167	A	Predicted	21.0	24.6	28.5	31.7	32.7	33.0	33.0
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
		Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H168	A	Predicted	22.0	25.6	29.4	32.6	33.6	34.0	34.0
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
		Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H169	A	Predicted	21.9	25.4	29.3	32.5	33.5	33.8	33.8
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
		Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H170	A	Predicted	21.2	24.9	28.7	31.9	32.9	33.2	33.2
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
		Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H171	A	Predicted	21.9	25.3	29.2	32.4	33.4	33.7	33.7
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
		Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--

H172		Predicted	21.0	24.5	28.4	31.6	32.6	32.9	32.9
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H173		Predicted	23.4	26.6	30.6	34.0	35.0	35.2	35.2
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H174		Predicted	23.1	26.3	30.3	33.6	34.6	34.9	34.9
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H175		Predicted	23.2	26.3	30.4	33.7	34.7	35.0	35.0
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H176		Predicted	23.0	26.0	30.1	33.4	34.4	34.7	34.7
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H177		Predicted	30.5	30.9	35.2	38.5	40.3	40.5	40.5
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H178		Predicted	29.8	30.3	34.6	38.0	39.6	39.9	39.9
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H179		Predicted	22.9	25.9	29.9	33.3	34.3	34.6	34.6
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H180		Predicted	29.5	30.1	34.4	37.7	39.4	39.7	39.7
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H181		Predicted	28.8	29.6	33.9	37.2	38.9	39.1	39.1
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0

	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H182		Predicted	29.1	29.8	34.1	37.4	39.1	39.3	39.3
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H183		Predicted	29.8	30.3	34.6	37.9	39.6	39.9	39.9
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H184		Predicted	23.7	26.6	30.7	34.1	35.1	35.4	35.4
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H185		Predicted	23.7	26.5	30.6	34.0	35.1	35.3	35.3
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H186		Predicted	29.4	29.9	34.2	37.5	39.2	39.5	39.5
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H187		Predicted	28.2	29.0	33.3	36.7	38.2	38.5	38.5
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H188		Predicted	28.0	28.9	33.2	36.6	38.1	38.4	38.4
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H189		Predicted	28.9	29.5	33.8	37.1	38.8	39.0	39.0
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H190		Predicted	27.0	28.0	32.3	35.7	37.2	37.5	37.5
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0

		Night-time Excess	--	--	--	--	--	--	--
H191		Predicted	26.8	27.9	32.2	35.5	37.0	37.3	37.3
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H192		Predicted	26.3	27.5	31.8	35.1	36.6	36.9	36.9
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H193		Predicted	23.3	25.8	30.0	33.3	34.5	34.7	34.7
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H194		Predicted	22.9	25.1	29.3	32.7	33.9	34.1	34.1
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H196		Predicted	23.4	26.3	29.9	33.1	34.3	34.8	34.8
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H197		Predicted	23.5	27.1	31.0	34.2	35.1	35.5	35.5
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H198		Predicted	26.3	27.5	31.7	35.1	36.6	36.8	36.8
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H199		Predicted	30.2	33.8	37.8	41.1	42.0	42.3	42.3
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H200		Predicted	31.2	34.8	38.7	42.0	43.0	43.2	43.2
		Daytime Criterion	40.0	45.0	45.0	45.0	45.0	45.0	45.0
	B	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	0.2	0.2
H201		Predicted	25.2	27.7	31.8	35.1	36.3	36.6	36.6

		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H202		Predicted	28.8	30.7	34.8	38.2	39.5	39.8	39.8
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H203		Predicted	28.3	30.2	34.3	37.6	38.9	39.2	39.2
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H204		Predicted	25.0	28.2	31.8	35.0	36.1	36.6	36.6
		Daytime Criterion	40.0	40.0	45.0	45.0	45.0	45.0	45.0
	C	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H205		Predicted	27.0	28.6	32.7	36.0	37.4	37.7	37.7
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H206		Predicted	32.8	36.6	40.3	43.5	44.4	44.8	44.8
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H207		Predicted	32.6	36.4	40.1	43.2	44.2	44.6	44.6
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H208		Predicted	26.1	28.8	33.0	36.4	37.5	37.6	37.6
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H209		Predicted	33.2	37.1	40.8	43.8	44.8	45.3	45.3
		Daytime Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Derelict	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Night-time Excess	--	--	--	--	--	--	--
H210		Predicted	34.1	38.0	41.6	44.6	45.6	46.1	46.1
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	0.6	1.1	1.1

		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	0.6	1.1	1.1
H211		Predicted	32.8	33.3	37.5	40.8	42.6	42.9	42.9
		Daytime Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
	Landowner	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	45.0	45.0	45.0	45.0	45.0	45.0	45.0
		Night-time Excess	--	--	--	--	--	--	--
H213		Predicted	28.6	29.3	33.6	36.9	38.6	38.8	38.8
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	E	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H214		Predicted	23.2	25.8	29.6	32.9	34.1	34.5	34.5
		Daytime Criterion	40.0	40.0	40.0	45.0	45.0	45.0	45.0
	D	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--
H215		Predicted	23.1	24.4	28.7	32.0	33.5	33.7	33.7
		Daytime Criterion	40.0	40.0	40.0	40.0	45.0	45.0	45.0
	A	Daytime Excess	--	--	--	--	--	--	--
		Night-time Criterion	43.0	43.0	43.0	43.0	43.0	43.0	43.0
		Night-time Excess	--	--	--	--	--	--	--