

From: [Environmental Co-ordination \(Inbox\)](#)
Sent: Friday 3 January 2025 09:35
To: [REDACTED]
Subject: FW: Proposed Lissinagroagh Wind Farm Consultation
Attachments: [Proposed Lissinagroagh Wind Farm EIAR Scoping Report.pdf](#)
[Lissinagroagh Wind Farm Co Leitrim.pdf](#)

Follow Up Flag: Follow up
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Good morning,

Please see comments/observations attached from our Felling Division.

Regards

Environmental Co-ordination Unit

From: Forestry Info <forestryinfo@agriculture.gov.ie>
Sent: Tuesday 3 December 2024 16:05
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Proposed Lissinagroagh Wind Farm Consultation

[REDACTED]
For your area.
[REDACTED]

From: [REDACTED]
Sent: Tuesday 3 December 2024 15:24
To: Forestry Info <forestryinfo@agriculture.gov.ie>
Cc: [REDACTED]
Subject: Proposed Lissinagroagh Wind Farm Consultation

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To Whom It May Concern,

FuturEnergy Ireland DAC proposes to develop a wind farm north of Manorhamilton in County Leitrim approximately 3 km south of the Northern Ireland border in County Fermanagh. The project will involve the development of a wind farm and all associated infrastructure including turbine foundations, hardstanding areas, borrow pits, access tracks, a 110kV electrical substation and an underground grid connection.

FuturEnergy Ireland DAC have commenced the process of Environmental Impact Assessment (EIA). The proposed wind farm site entrance, layout design and access points through which turbine components and construction deliveries may be made will be refined by the design team in consultation with the relevant planning authority and the local community. Detailed surveys and studies are currently being undertaken at the site and surrounding area and a project website has been established (<https://lissinagroaghwindfarm.ie/>). A team of technical experts are currently engaged in the process of scoping the environmental assessments for the project.

We invite you to submit any relevant information that you may hold and/or highlight any issues that you feel should be directed to the project team. Please see the enclosed EIA Scoping Document for further information (updated from the previously issued 2021 scoping report). Views/comments on the proposal can be submitted by email or letter to the undersigned as soon as convenient to ensure your views/comments are considered.

We request that submissions are provided before 5pm on Friday 24th January 2025.

Regards,

Notice of Upcoming Leave from Friday 13th December – 3rd January

TOBIN
Galway | Dublin | Castlebar | Limerick | Sligo
Telephone: +353 (0)1 8030401
Email: [REDACTED]
Website: <http://www.tobin.ie>

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2022 Engineers Ireland Awards Winner: CPD Employer of the Year
2022 Association of Consulting Engineers of Ireland Awards Winner: Innovation
2020 Association of Consulting Engineers of Ireland Awards Winner: Project Management
2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)



Tobin Consulting
Galway
Ireland

23RD December 2024

Re: The proposed Lissinagroagh Wind Farm north of Manorhamilton in County Leitrim approximately 3 km south of the Northern Ireland border in County Fermanagh.

Dear Sir/Madam,

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

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department before trees are felled or removed. A Felling Licence application form can be obtained from the Department's website link here: gov.ie - [Tree Felling Licences \(www.gov.ie\)](http://www.gov.ie)

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

The developer should take note of the contents of **Felling and Reforestation Policy** document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; gov.ie - [Tree Felling Licences \(www.gov.ie\)](http://www.gov.ie) As this development is within forest lands, particular attention should be paid to deforestation, turbulence felling and the requirement to afforest alternative lands.

In order to ensure regulated forestry operations in Ireland accord with the principles of sustainable forest management (SFM), as well fulfilling the requirements of other relevant environmental protection laws, the Department (acting through its Forest Service division) must undertake particular consultations, and give certain matters full consideration during the assessment of individual Felling Licence applications. This includes consultation with relevant bodies, the application of various protocols and procedures (e.g. Forest Service Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement).

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

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);



2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices are published online at: [gov.ie - Felling Licence Applications \(www.gov.ie\)](http://www.gov.ie)
3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 14 days to the Forestry Appeals Committee. Felling Licence decision are published on the Departments Forestry Licence Viewer (9FLV) link here: [Forestry Licence Viewer \(agriculture.gov.ie\)](http://agriculture.gov.ie)

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

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
- b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
- c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,
 1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project;

and

2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord Pleanála, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.
3. Please note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s)

pp. [REDACTED]

[REDACTED]
Higher Executive Officer
Felling Section



Subject: FW: GPre00386-2024 Manorhamilton Wind Farm
Attachments: [GPre00386-2024 Manorhamilton WF.pdf](#)

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Tuesday 11 February 2025 14:36
To: [REDACTED]
Subject: FW: GPre00386-2024 Manorhamilton Wind Farm

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From: [REDACTED]
Sent: Tuesday 11 February 2025 14:34
To: [REDACTED]
Subject: GPre00386-2024 Manorhamilton Wind Farm

A Chara,

Attached please find the Archaeological & Nature Conservation recommendations.

Regards,

[REDACTED]
[REDACTED]

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage
Executive Officer
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90



Our Ref: G Pre00386/2024
(Please quote in all related correspondence)

11 February 2025

Emily Fair
Tobin Consultant Engineers
Fairgreen House
Fairgreen Road
Galway

Via email: [REDACTED]

Proposed Development: Develop a wind farm north of Manorhamilton in County Leitrim approximately 3 km south of the Northern Ireland border in County Fermanagh.

A chara

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

The EIAR scoping report included with this pre-planning application highlights a number of environmental sensitivities in the study area, designated as an Area of Outstanding Natural Beauty and an Area of High Visual Amenity. As part of the proposed pre-planning assessments, the following should be considered;

- The Coillte plantations on which the wind farm have been proposed are located downslope of the Dough/Thur Mountains NHA and therefore are unlikely to impact directly on the habitats for which the site has been designated. Indirect impacts may exist however via peat instabilities on the slopes downslope of the NHA, with the potential for a bog slide event to occur in areas unsuitable for development.
- A number of hydrological connections to the Lough Gill SAC and Lough Melvin SAC have been highlighted within the proposed area that need to be considered individually as part of a Natura Impact Statement. Siltation risks to the SACs during construction works via these watercourses are therefore high. White-clawed

Aonad na nIarratas ar Fhorbairt

Development Applications Unit

Oifigí an Rialtais

Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90



Crayfish, Brook Lamprey, Salmon and Otter have all been recorded in the Owenmore River within the Lough Gill SAC. The Ballagh River in the Lough Melvin SAC also contains spawning grounds for Salmon and Brown Trout.

- Forestry plantations in the local area around the slopes of Dough Mountain and the adjacent Saddle Hill have been a reliable site for 1-2 pairs of nesting Hen Harrier over a number of years. The locations of nest sites have shifted between years, contingent on suitable habitat in pre-thicket rotations within the afforested areas and other rough grasslands in undisturbed areas. The potential for the disturbance to nesting harriers during construction operations is therefore high, with the additional collisions risks to adults participating in foraging and display flights during the operational lifespan of the windfarm.
- The landscape around Dough Mountain also forms part of the wider migration routes for Whooper Swan moving between their breeding grounds in Iceland and wintering areas further south in Ireland. Both Whooper Swan and Hen Harrier are protected under Annex I of the EU Birds Directive 2009/147/EC.
- Two flora protection order species - Small White Orchid (*Pseudorchis albida*) and the bryophyte *Brachydontium trichodes*, have been recorded in the study area at Faughary and Killea respectively. There may be additional unrecorded sites for these or other FPO species elsewhere within the study area and this should be considered during botanical surveys where suitable habitats exist.

Archaeology

The National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage has reviewed the 'EiAR Scoping Report' for the proposed Lissinagroagh Wind Farm Development, Co Leitrim.

The information provided was not sufficiently detailed to allow for a full assessment of the archaeological implications of this proposal, however the NMS notes that an Archaeological Impact Assessment (AIA) is scoped into the proposed EIA process as part of the overall Cultural Heritage Impact Assessment of the proposed development and will be carried out by a suitably Consultant Archaeologist. The supplied methodology indicates that this will incorporate a detailed desktop study and field inspection.

Planning & Design

In order to assess the impacts of this extensive wind farm development, this Department recommends that Archaeological Impact Assessment (AIA) should be carried out at an early stage of planning and design. The AIA must incorporate all lands on which development may be proposed, including but not limited to, access areas, haul roads, temporary compounds, borrow areas, cable array/connection routes, etc. The AIA must include an assessment of the possible effects of the proposal on the wider archaeological landscape. It is of importance that the study area for the AIA should be of sufficient size and extent to support this.

The Archaeological Impact Assessment must include:



- A baseline archaeological and historical study comprising site inspection/s by a suitably qualified Archaeologist and documentary research including reviews of historical, cartographic and aerial photography sources.
- Walkover surveys and field inspections.
- An Archaeological/Historic Landscape study.
- Visual Impact Assessment.
- The desk-study and field inspection regime should inform:
 - Targeted non-intrusive advance geophysical survey or prospection (such as Ground Penetrating Radar Surveys).
 - Targeted advance archaeological test excavation.
- Any and all intrusive advance investigations (such as, but not limited to, ground investigations for soils/geology/hydrogeology) carried out as part of the EIA or design process should be subject to a programme of archaeological monitoring by a suitably qualified archaeologist.

Comprehensive assessment is required in order to fully characterise the archaeological potential of the lands proposed for development and allow a clear and comprehensive archaeological impact statement to be made. The results of these investigations should inform the EIA process and be incorporated within the EIA Report. NMS is happy to provide further advice and clarification as and if required in relation to the preparation of suitably comprehensive assessments as outlined above, with particular regard to the scope and locations for any advance non-intrusive prospection or advance test excavation that would be appropriate to inform the assessment of this proposed scheme.

Assessment of Potential Effects

The AIA/EIAR must include an archaeological impact statement and present appropriate mitigation to ensure the protection of the archaeological heritage. It should set out the likely effects of the proposed development at all stages—Construction, Operation and Decommissioning. It is of particular importance that the likely effects of the proposal at decommissioning stage are fully assessed, particularly where the AIA/EIAR identifies vulnerable heritage assets located in proximity to the proposed development site (PDS) and the mitigation measures for Construction and Operation phases include protective measures for the preservation in situ of these assets.

National policy as detailed in *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland, 1999) is that there should always be a presumption in favour of avoiding developmental impacts on the archaeological heritage.

Direct Effects

The AIA/EIAR must include assessment of any potential for direct impacts on the archaeological resource, including previously unrecorded archaeological remains which may have no above-ground expression. The results of appropriate non-intrusive advance and archaeological test excavation will assist in this regard.

Indirect Effects

In addition to mitigating potential for physical impacts on the archaeological heritage, careful consideration should also be given in design to the potential for impacts on the setting and amenity of recorded monuments and the landscape/s in which they are situated. In this respect, it should be noted that in addition to site-specific vulnerabilities



to impact on setting many monument types—for example prehistoric monuments such as Standing Stone Alignments, Standing Stone Rows, Single Standing Stones, as well as some megalithic tombs—are often considered to represent a wide area of associated archaeological settlement and activity. As a result, the bunding/stockpiling of materials, intrusion into viewsheds or other characteristics of a development may have a negative visual impact on such monuments and may diminish or interrupt alignment views and alter key aspects of their original function and layout.

A detailed Archaeological/Historic Landscape Study and Visual Impact Assessment should be prepared as part of the AIA/EIA process. These should:

- Set out the key characteristics of the monument(s) and its surroundings that contribute to its setting (including inter-visibility, commonality, etc.) and the degree to which this setting is integral to the significance and appreciation of the monument.
- Assess the effects of the development—both positive and negative—on these key characteristics. The development should be considered in terms of its location and siting relative to the monument as well as its form, appearance and permanence.
- Be supported by appropriate illustrations of the monument, its setting and the development.

The size of the study area is a key factor to ensuring the indirect effects are appropriately assessed.

In this regard, the Department notes that the wider landscape of the scheme includes a section of the Black Pig's Dyke (National Monument No 653; RMP LE005-014----) as well as a substantial number of megalithic tombs—for example at Corraclona (National Monument No 405; RMP LE008-013----), Lisdarush (RMP LE008-005----), Carrigeengeare (RMP LE012-010----) and Tullysheherny (RMP LE005-022----)—and other ceremonial and ritual-type prehistoric monuments—such as at Shasmore (RMP LE008-006001-), Lisdarush (RMP LE008-004001-) or Kilroosk (LE007-010----). This may indicate that the proposed scheme is located in a prehistoric landscape with particularly heightened vulnerability to impacts on setting.

Notwithstanding the above, the Department awaits the submission of this assessment before commenting further.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie where used, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90



Is mise, le meas



Development Applications Unit
Administration

From: [DECC Planning Notifications](#)
Sent: Monday 16 December 2024 15:55
To: [REDACTED]
Subject: RE: Proposed Lissinagroagh Wind Farm Consultation
Attachments: [2024-12-16 GSI Submission.pdf](#)

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Dear [REDACTED]

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

Please send an acknowledgement of receipt to PlanningNotifications@decc.gov.ie at your earliest convenience.

Many thanks,

[REDACTED]
[REDACTED]
Planning Advisory Division

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

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

PlanningNotifications@decc.gov.ie

From: [REDACTED]
Sent: Tuesday, December 3, 2024 2:47 PM
To: DECC GSI Planning <GSIPlanning@GSI.ie>
Cc: [REDACTED]
Subject: Proposed Lissinagroagh Wind Farm Consultation

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We request that submissions are provided before 5pm on Friday 24th January 2025.

Regards,

Notice of Upcoming Leave from Friday 13th December – 3rd January

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Galway | Dublin | Castlebar | Limerick | Sligo
Telephone: +353 (0)1 8030401
Email: [REDACTED]
Website: <http://www.tobin.ie>

TOBIN





Tobin Consulting
Block 10-4, Blanchardstown Corporate Park,
Dublin 15, D15 X98N

16 December 2024

Re: Proposed Lissinagroagh Wind Farm - EIAR Scoping Report

Your Ref: n/a

Our Ref: 24/421

Dear

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and interpretation and gather various data for that purpose. Please see our [website](#) for data availability.

With reference to your email received on the 06 December 2024, concerning the proposed Lissinagroagh Wind Farm - EIAR Scoping Report, we recommend using our various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. For more detailed information on how to access this data please access 'Data and Maps' [Data & Maps \(gsi.ie\)](#) on our 'Geoscience for planning' webpage. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution).

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

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



Geoheritage

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

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

The audit for Co Leitrim was completed in 2020. The full report details can be found [here](#). **Our records show that there is a CGS in the vicinity of the proposed wind farm study area.**

Dough Mountain, Co. Leitrim (GR 593945, 842361), under IGH themes: IGH1 Karst, IGH14 Fluvial and Lacustrine Geomorphology, IGH7 Quaternary. Dough Mountain is a domed, upland ridge approximately 5 km northeast of Manorhamilton. This is a particularly complex site in terms of its' geological history, and has an array of unusual karst features, upland ribbed moraines and straight-as-an-arrow stream gullies. Perhaps the most striking features across the mountain top are deep depressions on the western side, where karstic cavities underground in the limestone have opened up at surface, as a result of the ground above them sinking, and forming enclosed depressions (dolines). Some of these are up to 30m across and 20m deep, and some in turn have developed into swallow holes. Springs emerge from the mountain side in this general area also, and one of the depression features has become a vertical pothole shaft, at the base of which is a recently-explored cave, Polldough. Link to Site Report: [LM009](#).

Although the wind farm project is in the early stages of development, there may be potential impacts on the integrity of current CGS envisaged by the proposed development, should this site not be assessed as a constraint. Ideally, the site should not be damaged or integrity impacted or reduced in any manner due to any proposed construction and/or modification of access roads, from traffic due to access road construction and grid connection works and installation. This would include impacts that may be related to altered drainage patterns, changes in soil profiles and structures etc. However, this is not always possible, and in this situation appropriate mitigation measures should be put in place to minimize or mitigate potential impacts.

We would also ask that the design of any future development considers the use of information panels as appropriate to highlight the significance of the impacted CGS. Please contact Geological Survey Ireland Planning Programme (GSIPlanning@gsi.ie) for further information and possible mitigation measures if applicable.

Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be redacted for confidentiality and added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>.



If we can be of any further help, please do not hesitate to contact me [redacted] or my colleague [redacted] at GSIPanning@gsi.ie.

Yours sincerely,



Geoheritage and Planning Programme
Geological Survey Ireland



Geoheritage and Planning Programme
Geological Survey Ireland

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data are made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases these data are a baseline or starting point for further site specific assessments.

From: [Defence Property Management Planning](#)
Sent: Wednesday 4 December 2024 09:20
To: [REDACTED]
Cc: [REDACTED] [Defence Property Management Planning](#)
Subject: RE: Proposed Lissinagroagh Wind Farm Consultation

You don't often get email from propertymanagementplanning@defence.ie. [Learn why this is important](#)
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Dear [REDACTED]

We wish to acknowledge receipt of your e-mail and attached documentation.

We will consult with the relevant Military authorities and revert in due course.

Please note that the e-mail address for all planning related correspondence to the Department of Defence is:

PropertyManagementPlanning@defence.ie (as per above)

Kind regards,

[REDACTED]

[REDACTED]

—

[REDACTED]

An Roinn Cosanta
Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.
Station Road, Newbridge, Co.Kildare, W12 AD93.

From: [REDACTED]
Sent: Tuesday 3 December 2024 14:46
To: Defence Info <info@defence.ie>
Cc: [REDACTED]
Subject: Proposed Lissinagroagh Wind Farm Consultation

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We request that submissions are provided before 5pm on Friday 24th January 2025.

Regards,

Notice of Upcoming Leave from Friday 13th December – 3rd January

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Galway | Dublin | Castlebar | Limerick | Sligo
Telephone: +353 (0)1 8030401
Email: [REDACTED]
Website: <http://www.tobin.ie>

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2020 Association of Consulting Engineers of Ireland Awards Winner: Project Management
2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)



Patrick J TOBIN & Co. Ltd
Fairgreen House,
Fairgreen Road,
Galway

12 December 2024

Re: Proposed Lissinagroagh Wind Farm, Manorhamilton, Co. Leitrim.

Without Prejudice

Dear [REDACTED]

I write with regard to your letter and attached documentation dated 05th December 2024 relating to the proposed Lissinagroagh Wind Farm, Manorhamilton, Co. Leitrim.

Located north of Manorhamilton in north County Leitrim.

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

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

Having consulted with the Military authorities, the Department of Defence wishes to make the following observations:

- The Minister for Defence is responsible for the regulation of military aviation, whereas the Irish Aviation Authority (IAA) is responsible for the safety regulation of civil aviation including aerodromes. The IAA does not have remit for military aviation or installations. Safeguarding of military flight operations and installations is intended to protect both current and future aircraft operations and also to take account of the security requirements associated with some of those operations.



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

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

We would appreciate if you could keep us informed on any progress relating to this proposed development, in particular if this development was to progress to the planning stage.

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

Best regards



—

An Roinn Cosanta

Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.

Station Road, Newbridge, Co.Kildare, W12 AD93.

—

T

From: [Transport GCU](#)
Sent: Tuesday 21 January 2025 11:33
To: [REDACTED]
Cc: [REDACTED] [Transport GCU](#)
Subject: FW: Proposed Lissinagroagh Wind Farm Consultation
Attachments: [Proposed Lissinagroagh Wind Farm EIAR Scoping Report.pdf](#)
[20250116 DoT submission.docx](#)

Follow Up Flag: Follow up
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Good morning,

Please find attached for your consideration submission from Department of Transport in relation to Proposed Lissinagroagh Wind Farm Consultation.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

An Roinn Iompair
Department of Transport
Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60
T [REDACTED] www.gov.ie/transport

From: [REDACTED]
Sent: Tuesday, December 3, 2024 2:38 PM
To: Transport Department of Transport <info@transport.gov.ie>
Cc: [REDACTED]
Subject: Proposed Lissinagroagh Wind Farm Consultation

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To Whom It May Concern,

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Regards

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2020 Association of Consulting Engineers of Ireland Awards Winner: Project Management
2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)



[REDACTED]

TOBIN
Galway

21st January 2025

RE: Proposed Lissinagroagh Wind Farm Consultation

The Department of Transport welcomes the opportunity to provide observations in relation to the Scoping Report for the Proposed Lissinagroagh Wind Farm, County Leitrim.

It should be noted that the Department considers the construction involved in providing this development and especially, the connection cables to the national grid, may have effects on both the environment and the Regional and Local Road network.

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

- Their presence within the public road will likely significantly restrict the Road Authority in carrying out its function to construct and maintain the public road and will likely add to the costs of those works post construction.
- Their installation within the lands associated with the public road may affect the stability of the road. In particular where the road is a “legacy road” (where there is no designed road structure and the subgrade may be poor or poorly drained) or bog rampart and the design needs to take account of all the variable ground conditions and not be based on a sample of the general soil conditions. This should include a constructability assessment to a 950mm minimum cover depth to the HV Cable on legacy roads, roads over peat/bog ramparts.
- The possible effect on the remaining available road space (noting that there may be need to accommodate other utilities within the road cross-section in the



future or additional drainage for climate adaptation) on potential future development.

- The necessity to have the power in the cables switched off (particularly where structural failures occur due to extreme weather events) where the Road Authority considers this necessary in order to carry out its function to construct and maintain the public road and a complete operation and maintenance manual should be agreed with the Local Authority.

The Department consider it important that the examination of the proposal should include consideration of the following:

- Examination of all available technologies including both Overhead Line (OHL) and Underground Cable (UGC) options or combinations of both) and route options other than the routing of cables along the public road the ensure the best performing route and technology option is selected, (ensuring compliance with CAP24)
- Examination of options for connection to the national grid network at a point closer to the wind farm in order to reduce the adverse impact on public roads,
- Details of where within the road cross section cables are to be placed so as to minimise the effect on the Roads Authority in its role of construction and maintenance,
- Examination of details of any chambers proposed within the public road cross section so as to minimise the effect on the Roads Authority in its role of construction and maintenance,
- Elimination of permanent jointing bays from beneath the road pavement to protect the integrity of the road structure for the safety of those driving on the public road by eliminating hard spots and also preserve the road width for other utilities, temporary joint bays to be used in any public road installation,
- No attachment of cables to all bridge structures and culverts by diverting them beneath or away from these structures and,
- Rationalisation of the number of cables involved (including existing electric or possible future cables) and their diversion into one trench, in order to minimise the impacts on the road network and the environment along the road boundary (hedgerows).



The Department considers the following should be considered when applying conditions to any approval:

1. A condition requiring the specific approval of the local authority to the detail of the final route of cables through the public road space. If, during construction, there is a need to deviate from the detailed design then the approval of the local authority would again be sought. This would assist in minimising the impact on the public road.
2. A condition requiring the developer to, at a minimum, comply with all appropriate standards and, inter alia the Guidelines for Managing Openings in Public Roads, 2017 in order to ensure orderly development.
3. A condition requiring that the location of the cables would be recorded as exactly as possible, using BIM type technology, so as to facilitate the further use of road space for utilities and the maintenance/construction of the public road by the Roads authority. This record should include as constructed surveys of all infrastructure altered, added, removed or relocated and exact detail of the road construction including any drains or other features encountered. The record should be lodged with the local authority and with the ESB Networks for retention on their records.
4. A condition to require the elimination of permanent jointing bays from under the road pavement to protect the integrity of the road structure, thereby improving safety for those driving on the public road by eliminating hard spots and preserving the road width for other utilities.
5. A condition requiring the developer to route cables away from bridge structures and specifically preventing the developer from attaching cables to road bridges. This would allow for the future maintenance of bridges without interruption of the electricity supply along the cables.
6. A condition requiring the replacement of culverts that have been excavated during the cable duct placement operation. The replacement culverts should be designed appropriately and include an allowance for the effects of climate change.
7. A condition requiring the developer to notify the Roads Authority of the owner of the cables (Owner) and the controller (Power Controller) of the power transmitted along the cables. In addition, the condition should require Owner and



Power Controller to notify the Roads Authority of any change in ownership of the cables or change of Power Controller transmitting power along the cables. In all instances the Owner and Power Controller should be required to maintain an agreed contacts list with the Roads Authority.

Central Policy, Coordination and Reform

An Roinn Iompair

Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60

Leeson Lane, Dublin, D02 TR60

T +353 (0)1 604 1177

gcu@transport.gov.ie www.gov.ie/transport

From: [REDACTED]
Sent: Tuesday 31 December 2024 14:04
To: [REDACTED]
Subject: FW: Proposed Lissinagroagh Wind Farm Consultation
Attachments: [Proposed Lissinagroagh Wind Farm EIAR Scoping Report.pdf](#)

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Dear [REDACTED]

I acknowledgement receipt of your request for submissions and advise that Donegal County Council have no observations to make at this stage and recommend that you continue to engage directly with our colleagues in Leitrim County Council in relation to the scoping of this project.

Your sincerely

[REDACTED]

From: [REDACTED]
Sent: Tuesday, December 3, 2024 2:14 PM
To: DCCINFO <info@Donegalcoco.ie>
Cc: [REDACTED]
Subject: Proposed Lissinagroagh Wind Farm Consultation

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Email: [REDACTED]
Website: <http://www.tobin.ie>

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2022 Association of Consulting Engineers of Ireland Awards Winner: Innovation
2020 Association of Consulting Engineers of Ireland Awards Winner: Project Management
2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)
2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year

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From: [Info - EirGrid](#)
Sent: Tuesday 3 December 2024 16:00
To: [REDACTED]
Cc: [REDACTED] [Info - EirGrid](#)
Subject: RE: Proposed Lissinagroagh Wind Farm Consultation

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[REDACTED]

Thanks for your mail.

In order to expedite generator applications, it is EirGrid's policy not to comment on EIA scoping reports.

Kind regards,

[REDACTED]

[EirGrid.com](https://www.eirgrid.com)



From: [REDACTED]
Sent: Tuesday, December 3, 2024 3:12 PM
To: Info - EirGrid <Info@Eirgrid.com>
Cc: [REDACTED]
Subject: Proposed Lissinagroagh Wind Farm Consultation

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From: [planning applications](#)
Sent: Friday 17 January 2025 09:41
To: [REDACTED]
Subject: Fw: Proposed Lissinagroagh Wind Farm Consultation
Attachments: [Fáilte Ireland EIAR Guidelines 2023.pdf](#)

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Hello [REDACTED]

Thank you for your email and the EIA Scoping Document regarding FuturEnergy Ireland DAC proposal to develop a wind farm north of Manorhamilton in County Leitrim.

Please see attached a copy of the updated Fáilte Ireland's Guidelines (2023) for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed project. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Also for your information Fáilte Ireland has a dedicated mailbox for all planning notifications/applications and consultations planning.applications@failteireland.ie. By using this email address, it will ensure the information/notifications will go direct to the Manager of Environment & Planning (Shane Dineen) and the Planning Team and will be reviewed and responded to in a timely manner by the Manager and the Environment & Planning Team. Please use this email address for all future planning notifications/applications and consultations.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

88-95 Amiens Street, Dublin 1, D01 WR86

M [REDACTED]



[LinkedIn](#) | [Twitter](#) | [YouTube](#) | [Facebook](#)



From: [REDACTED]
Sent: Tuesday 3 December 2024 14:22
To: planning applications <planning.applications@failteireland.ie>
Cc: [REDACTED]
Subject: Proposed Lissinagroagh Wind Farm Consultation

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Regards
[REDACTED]

EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects



July 2023

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1. Introduction

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

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

This guidance document has been prepared by Fáilte Ireland to update their EIA guidelines in line with changes in legislative and guidance requirements.

2. Background to this Document

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately **260,000 people**, an economic contribution of **€9.5 billion**, and exchequer revenue of **€1.8 billion** in 2019, which helps fund other key public services.

In 2019 Ireland welcomed **9.7 million overseas visitors**.

Fáilte Ireland is the National Tourism Development Authority established by the Irish Government in May 2003. Fáilte Ireland's role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. They provide a range of practical business supports to help tourism businesses better manage and market their products and services.

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

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

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

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

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

3. Legislation and Statutory Guidance

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

Legislation

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

Statutory Guidance

In response to the changes to the EIAR requirements under Directive EU 2014/52, the Environmental Protection Agency (EPA) developed Guidelines on the information to be contained in Environmental Impact Assessment Reports in May 2022. The Guidelines are a statutory document to be regarded by those preparing EIARs and the decision makers considering the EIARs.

Some of the key changes to the EIA Directive introduced by Directive 2014/52/EU are as follows:

- Additional information to be provided in the project description to describe the location of the project, the technologies and substances used, the construction of the project and required demolition;
- The requirement for consideration of alternatives has changed from a requirement to provide 'An outline of the main alternatives studied by the developer and an indication of the main reasons for this choice, taking into account the environmental effects' to 'a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment';
- A refinement of the environmental factors to be considered in the assessment with an increased focus on resource efficiency, climate change, biodiversity and disaster prevention;
- Changes to Prescribed Environmental Factors with 'Land' being added, 'Human Beings' replaced by 'Population & Human Health' and 'Flora & Fauna' replaced by 'Biodiversity';

- The developer is required to have competent experts to prepare the EIAR and the Board is required to have access to sufficient expertise to assess the EIAR;
- Requirement for the incorporation of mitigation and monitoring measures in consents and ensuring that developers deliver these measures;
- The requirements for the assessment of cumulative effects with existing and/or approved projects, taking into account existing environmental issues to be considered; and
- Reasoned decisions made with regard to the EIA outcomes must be provided.

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

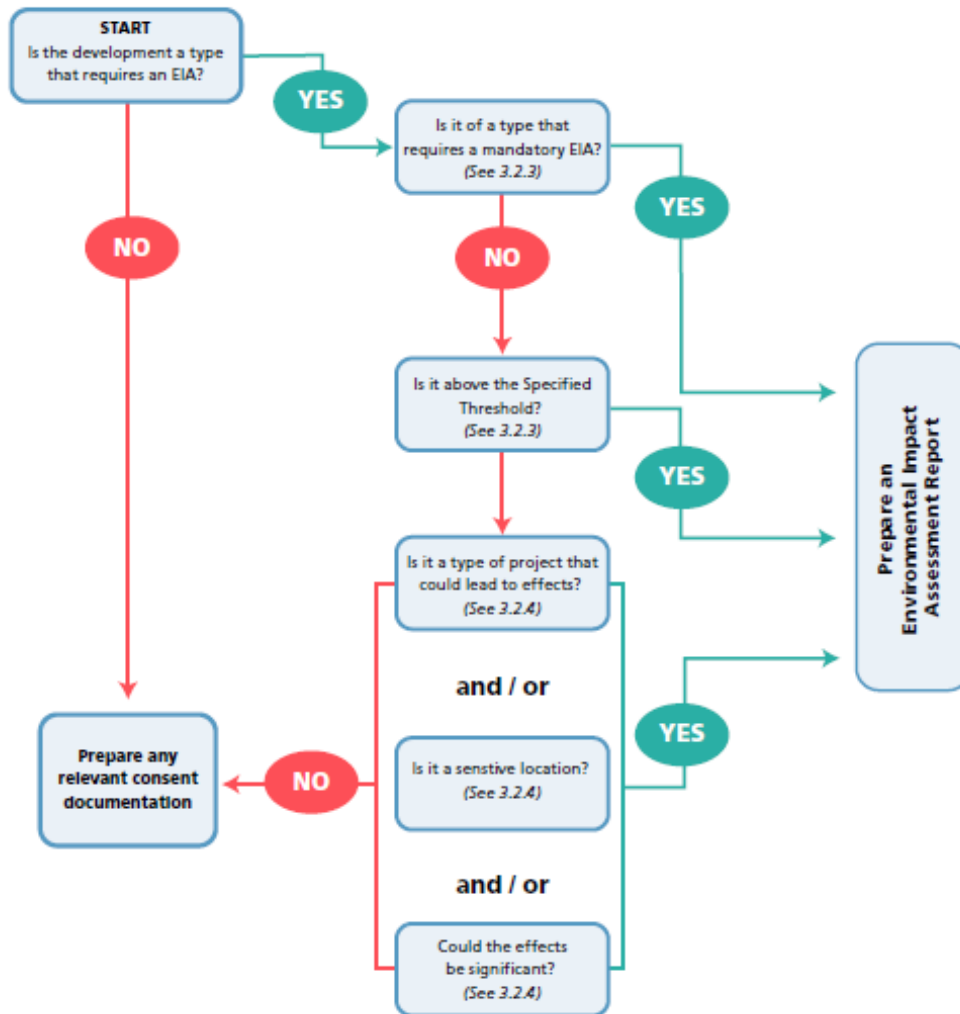
The process of EIA is set out in the EPA EIAR Guidelines, this document should be read in conjunction with and used as supplementary guidance to the EPA EIAR Guidelines. The process for ascertaining whether an EIAR is required is known as ‘screening’ and the process to determine the breadth and scope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

Screening

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

The prescribed development types and thresholds are set out in Annex I and II of the EIA Directive as transposed into Schedule 5 of the Planning and Development Regulations 2010-2018 (as amended). Development which does not exceed these thresholds but may require an EIAR are called sub threshold. Sub-Threshold considerations are outlined in Schedule 7 of European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) as transposed from Annex III of the Directive. The Guidelines on Environmental Impact Assessment Reports note that projects at first glance may not appear to come under the Schedule but on closer examination when the process is further examined, they may do so because of the sensitivity or significance of the receiving environment etc. Sub threshold developments require an EIAR if they are likely to have significant environmental impacts and must undergo assessment for likely significant impacts through an EIAR screening report. The contents of a screening report for subthreshold development are contained in Annex III of the EIA Directive.

Figure 1: EIAR Screening Process



(Taken from Fig 3.2 of the EPA Guidelines)

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

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

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

EIAR Scoping

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

4. Assessing Tourism

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

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

Projects which involve a tourism element

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

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

Projects which may have an impact upon tourism

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

According to the Fáilte Ireland Tourism Facts 2019 Report, the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are;

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

- Pace of Life

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

5. Guiding Principles of EIAR

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

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

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

6. Consideration of Competency and Qualifications

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

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

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

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

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

7. EIAR Requirements

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

- project description;
- assessment of alternatives considered;
- baseline assessment;
- assessment of effects;
- cumulative impact;
- interaction of impacts;
- mitigation & monitoring; and
- residual impacts

Project Description

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

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

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

Assessment of Alternatives

The assessment of the various reasonable alternatives is an important requirement of the EIA process.

Where tourism projects are location dependent the assessment of reasonable alternatives should consider alternative methods, layouts, technologies and mitigations, detail the key considerations culminating in the selection of the option/design, the reasoning for these and the environmental effect of these decisions. This is particularly important for tourism projects which are often location tied. The EPA EIAR Guidelines indicate that it is generally sufficient to provide a broad description of each main alternatives and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option.

Baseline Assessment

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

For example, in a tourism context;

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

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

The significance of the tourism assets or activities likely to be affected should be highlighted. Reference to any existing formal or published designation or recognition of such significance should be included. Where possible the value of the contribution of such tourism assets and activities to the local economy should also be provided.

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

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

Impact Assessment

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

Impact assessment should be carried out as per EPA guidelines and the best practice for that prescribed topic. It may be considered appropriate to consider impact on tourism under the 'Population and Human Health' and / or 'Landscape' topics as suggested below.

Population and Human Health

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

The impact upon tourism can be considered within this section through the sensitivities of Hospitality, Safety and Pace of Life. Changes in population can impact the perception of pace of life or safety in a particular location. Impacts upon these issues in areas which rely heavily on tourism or have a particular sensitive tourism generator should be considered in this section. The EPA guidelines makes reference to amenity “..which may be relevant under 'Population and Human Health' and 'Landscape'”.

Biodiversity

Particular tourist activities can have a significant impact upon biodiversity. Landscapes which are 'unspoiled' can be attractors of tourism. However, the disturbance to ecology must be managed to minimise impacts.

Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

The assessment should also consider current Government policy on nature conservation as outlined in the National Biodiversity Action Plan 2017-2021 (NBAP) (and subsequent iterations (Including draft NBAP recently open for public consultation, to cover 2023 to 2027) which also includes Ireland's vision for biodiversity below.

'That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.'

Land, Soils and Geology

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

The impact upon Geotourism related to geoh heritage within the natural environment, e.g., any impacts on UNESCO Global Geoparks, of which we currently have three on the island of Ireland; Copper Coast in Co. Waterford, Burren and Cliffs of Moher in Co. Clare, and Cuilcagh Lakelands in Cavan and Fermanagh should be considered (where applicable) in this section.

Indirect impacts such as material use for extensive landscaping and public realm should also be considered.

Water

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

Air Quality and Climate

Tourism impact upon air quality is dependent on the activity proposed and sensitivity of the location. If the tourism project includes a large increase in transportation services, collection of baseline air emission data is advised. Transportation emissions affect not only air quality, but also greenhouse gases. Changing climatic patterns due to climate change should be factored into this analysis.

Noise and Vibration

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

Material Assets; Traffic and Transport

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

avoid peak tourism periods in tourism areas and should consider planned or anticipated tourism events and festivals.

Cultural Heritage

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

Archaeology

Archaeology can be of tourism interest and can be an attractive or key component of tourism projects. Archaeology can be a tourism attractor and given that national policy emphasis on the non-renewable nature of the archaeology and archaeological heritage, focus should be a presumption in favour of its preservation in-situ or where preservation in-situ is not the option chosen, there must be preservation by record (i.e. archaeological excavation and recording must take place) in line with statutory requirements.

Material Assets; Waste Management

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

Material Assets

Material assets outside of the material assets already referenced that should be considered are built services (utilities) and infrastructure. Tourism development should include impact assessment on built services (utilities) and infrastructure while non tourism related development should consider the effect on tourism, which should be considered.

Landscape

The visual impact of a tourism development, especially in locations which are visually sensitive or renowned for their scenic or landscape beauty, should be considered carefully. A development intended to utilise or enjoy a particular vista or environment should minimise impact upon that environment.

Major Accident and Natural Disaster

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

Interaction of Impacts

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

Cumulative Impact

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

Transboundary Impact

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

Mitigation & Monitoring

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

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

Reduce the exposure of sensitive resources to excessive environmental impact.

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

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

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

With regard to Monitoring, Article 8a of the EIA Directive requires that:

1. 'The decision to grant development consent shall incorporate at least the following information ...

(b) any environmental conditions attached to the decision, a description of any features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment as well as, where appropriate, monitoring measures. ... 4 Member States shall ensure that the features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment are implemented by the developer, and shall determine the procedures regarding the monitoring of significant adverse effects on the environment. The type of parameters to be monitored and the duration of the monitoring shall be proportionate to the nature, location and size of the project and the significance of its effects on the environment. Existing monitoring arrangements resulting from Union legislation other than this Directive and from national legislation may be used if appropriate, with a view to avoiding duplication of monitoring.'

Residual Impacts

The residual impacts are the final predicted or intended impacts which occur after the proposed mitigation measures have been implemented.

8. Sources of information on Tourism

Information available online

Fáilte Ireland

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

Fáilte Ireland also manages an environmental surveying and monitoring database as part of the Wild Atlantic Way Operational Programme which can be accessed [here](#). The purpose of this is to work with and demonstrate to our stakeholders and partners that we are committed to the sustainable development of the Wild Atlantic Way, and to be able to pre-empt and avoid environmental effects in the future should they occur.

Discover Ireland:

Operated by Fáilte Ireland, the Discover Ireland website includes comprehensive information on tourist attractions in destinations all around Ireland, including listings for activities, accommodation, events and experiences for every county, major town and region in Ireland. The website features elements from the four destination brands – Wild Atlantic Way, Ireland's Ancient East, Ireland's Hidden Heartlands and Visit Dublin and can be accessed [here](#).

Tourism Ireland

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

Local Authorities

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

Regional Assemblies

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

Central Statistics Office

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

From: [REDACTED]
Sent: Monday 27 January 2025 09:23
To: [REDACTED]
Subject: Fw: Proposed Lissinagroagh Wind Farm Consultation
Attachments: [Proposed Lissinagroagh Wind Farm Consultation 1 \(AutoRecovered\).docx](#)

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

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Good Morning [REDACTED]

Unfortunately, with the very bad weather on Friday I was not able to send this across, as electricity and internet was off.

See attached, which I hope will be of assistance and the Council looks forward to a formal consultation on the proposal in due course.

Regards

[REDACTED]
[REDACTED]

Tel: 0300 303 1777

Textphone: [REDACTED]





Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

From: [REDACTED]
Sent: 03 December 2024 02:15 PM
To: Information <info@fermanaghomagh.com>
Cc: [REDACTED]
Subject: Proposed Lissinagroagh Wind Farm Consultation

CAUTION: This message originates from outside our organisation. Consider carefully whether you should click on any links, open any attachments or reply. If in doubt, forward to helpdesk@fermanaghomagh.com

To Whom It May Concern,

FuturEnergy Ireland DAC proposes to develop a wind farm north of Manorhamilton in County Leitrim approximately 3 km south of the Northern Ireland border in County Fermanagh. The project will involve the development of a wind farm and all associated infrastructure including turbine foundations, hardstanding areas, borrow pits, access tracks, a 110kV electrical substation and an underground grid connection.

FuturEnergy Ireland DAC have commenced the process of Environmental Impact Assessment (EIA). The proposed wind farm site entrance, layout design and access points through which turbine components and construction deliveries may be made will be refined by the design team in consultation with the relevant planning authority and the local community. Detailed surveys and studies are currently being undertaken at the site and surrounding area and a project website has been established

(<https://lissinagroaghwindfarm.ie/>). A team of technical experts are currently engaged in the process of scoping the environmental assessments for the project.

We invite you to submit any relevant information that you may hold and/or highlight any issues that you feel should be directed to the project team. Please see the enclosed EIA Scoping Document for further information (updated from the previously issued 2021 scoping report). Views/comments on the proposal can be submitted by email or letter to the undersigned as soon as convenient to ensure your views/comments are considered.

We request that submissions are provided before 5pm on Friday 24th January 2025.

Regards,

Notice of Upcoming Leave from Friday 13th December – 3rd January

[REDACTED]
TOBIN

Galway | Dublin | Castlebar | Limerick | Sligo

Telephone: +353 (0)1 8030401

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Proposed Lissinagroagh Wind Farm Consultation

Fermanagh and Omagh District Council (FODC) welcomes the opportunity to provide information or identify potential issues in respect of the FuturEnergy Ireland DAC proposal to develop a wind farm north of Manorhamilton in County Leitrim, approximately 3 km south of the Northern Ireland border in County Fermanagh.

FODC acknowledges the detailed Environmental Impact Assessment (EIA) scoping report prepared by TOBIN Consulting Engineers. While the report covers a broad range of topics, FODC recommends placing greater emphasis on the site's proximity to Fermanagh and Omagh District Council area, as it lies just 3 km from the border which is within the Zone of Influence (Zoi).

Although the report considers relevant EU, national, and regional legislation, further consideration should be given to wildlife and their habitats as provided for in the Wildlife Acts.

Also at a more local level, the Council adopted on 16 March 2023, its Plan Strategy (Fermanagh and Omagh Local Development Plan 2030, Plan Strategy). Whilst this relates to planning applications within the FODC boundary area, it does contain relevant designations, information and data, that should be carefully considered as part of the current process.

Of particular relevance, are the supporting landscape studies that were completed as part of the plan process, these are outlined below. FODC would highlight that there may be potential visual amenity impacts within FODC area due to the scale and magnitude of the proposed windfarm, which would significantly alter the landscape. A windfarm on this site, of the scale and magnitude proposed will present a very significant change to the landscape.

[Fermanagh and Omagh Wind Capacity Study](#)

[Fermanagh and Omagh Designation Review](#)

[Fermanagh and Omagh Landscape Review](#)

FODC agrees with the approach of developing a standalone Construction Environmental Management Plan (CEMP). FODC recommends incorporating a Pollution Prevention Plan (PPP) to ensure that, in the event of an incident, all staff are aware of the required actions and the appropriate locations for implementing mitigation measures. Additionally, FODC encourages ensuring that the CEMP complies with all relevant Pollution Prevention Guidelines (PPGs), Guidelines for Pollution Prevention (GPPs), Construction Industry Research and Information Association (CIRIA) standards, and any other relevant guidance or best practice documents.

Additionally, while the Environmental Impact Assessment (EIA) considers Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) within the Zone of Influence in Northern Ireland, including Lough Melvin SAC and Pettigoe Plateau SPA, it does not address Areas of Special Scientific Interest (ASSIs), which hold protections comparable to Natural Heritage Areas and proposed Natural Heritage Areas (NHAs and pNHAs) in the Republic of Ireland as sensitive receptors. FODC would urge TOBIN Consulting Engineers to take consideration of the sensitive nature of ASSIs including Lough Melvin ASSI which is hydrologically connected to the proposed development site.

FODC recommends incorporating information from sources in Northern Ireland, such as NBN Atlas¹ and CEDaR², due to the proximity of the proposed development to County Fermanagh. This is particularly important as many species are transboundary in nature and/or inhabit environments linked through shared hydrological and hydrogeological systems. FODC acknowledges the broad range of surveys included under Section 6.4.2, Field Surveys. However, additional surveys, such as bird surveys including wintering bird surveys, should also be considered. Access to the results of the completed surveys would be helpful to provide a fully informed response regarding potential issues and the overall impact of the development.

FODC agrees that having a separate Nature Impact Statement (NIS) represents best practice. However, allowing consultees to review the NIS would be beneficial, as it could provide valuable insights into the connections between the development site and European designated sites including those designated sites within the Fermanagh and Omagh District.

FODC acknowledges the thorough evaluations planned for Section 7.0 Land, Soil, and Geology of the EIA scoping report. However, we note the absence of some critical assessments necessary to ensure the development does not significantly impact the site's geology. A Peat Landslide Hazard Assessment should be conducted to confirm that the ground is stable enough to support the development throughout both construction and operation. This is especially important in light of the recent peat landslide associated with the development of a wind farm in Meenbog³. Additionally, a Peatland Heritage Impact Assessment should be carried out before any boreholes or trial pitting are undertaken, to prevent potential damage to artifacts of archaeological significance, particularly given the close proximity of Shasmore Cairn to the site.

FODC acknowledges the comprehensive approach outlined for the climate assessments, noting that the development aligns with FODC's Climate Change and Sustainable Development Strategy 2020 – 2030. While the climate impact

¹ <https://northernireland.nbnatlas.org/>

² <https://www2.habitas.org.uk/records/>

³ <https://www.loughs-agency.org/newsroom/meenbog-incident-update-03-12-20>

assessment will evaluate the project's direct and indirect effects on climate change, incorporating current and proposed land use, as well as national objectives for forestry development and predicted future climate data, would provide valuable context. This would further emphasise the importance of investing in renewable energy.

Aerial imagery of the area indicates that much of the habitat on the proposed site consists of intermittent peatland and forestry. Peatland is a priority habitat in Northern Ireland, providing crucial support to a range of protected and endangered species. Therefore, peatlands should be safeguarded from development whenever possible. If development on peatland is unavoidable, mitigation and enhancement measures should be implemented to reduce the project's impact. Where possible, peatland restoration activities, such as blocking drains and removing scrub, should be incorporated into the development plans to ensure the protection of biodiversity on site. This approach supports one of the key objectives of the Fermanagh and Omagh District Council Biodiversity Strategy and Action Plan, which aims to protect peatlands.

FODC also highlight potential issues with respect to noise and residential amenity associated impacts associated with the proposal, this includes potential issues of shadow flicker and ice throw. Careful consideration will need to be given to these issues.

Of relevance will be;

‘A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise

Noise Policy Statement for Northern Ireland (NPSNI) (Department for the Environment, 2014)

The potential impact on tourism, including impacts on tourism within FODC will be an important material consideration. Of relevance will be the Council's Visitor Experience Development Plan (VEDP) for Fermanagh Lakelands and Omagh and the Sperrins is a 10-year roadmap for tourism in the area.

[Visitor Experience Development Plan – Fermanagh & Omagh District Council](#)

This proposal is one which has the potential to have adverse impacts within Fermanagh and Omagh District Council and therefore will engage the transboundary requirements of the EIA legislation. The Council will reserve its position on the planning merits of the proposal until a formal transboundary consultation is issued. At that stage, the application will be accompanied with various surveys, which will help inform the Council's assessment of the proposal.

Tobin Engineering

Our Ref: CAS-16069-J6K3, response sent to [REDACTED]

04/12/2024

Re: Proposed Lissinagroagh Wind Farm Consultation & your letter of 03/12/2024

To whom it may concern,

The Health and Safety Authority (the Authority), acting as the Central Competent Authority under the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015 (S.I. 209 of 2015) gives technical advice to the Planning Authority when requested, under regulation 24(2) in relation to:

- (a) the siting and development of new establishments;
- (b) modifications to establishments of the type described in Regulation 12(1);
- (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting, modifications or developments may be the source of, or increase the risk or consequences of, a major accident.

Since the above-referenced application appears to be outside the scope of the Regulations, the Authority has no observations to forward.

If you have any queries please contact the undersigned.

Yours sincerely

[REDACTED]
[REDACTED]

COMAH, Chemical Production & Storage (CCPS)

From: [Airspace and U Space division](#)
Sent: Friday 6 December 2024 15:15
To: [REDACTED]
Cc: [REDACTED] planning@airnav.ie; [Airspace and U Space division](#)
Subject: RE: Proposed Lissinagroagh Wind Farm Consultation

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Hi [REDACTED]

The Irish Aviation Authority (IAA) Airspace & U-Space Division (AUSD) does not get involved in the planning process. The IAA AUSD is to be notified as detailed hereafter:

According to [S.I. 215 of 2005, Irish Aviation Authority \(Obstacles to Aircraft in Flight\)](#), the IAA AUSD requires any person who seeks to erect a manmade object to notify the aerodrome operator of the intended operation **at least thirty days** in advance if the structure is to be erected in the vicinity of the aerodrome or the areas around the aerodrome and other protected surfaces associated with the aerodrome. Aerodrome Operators can be contacted via the [AirNav Ireland AIP AD 1.3 INDEX TO AERODROMES AND HELIPORTS](#), to evaluate the impact of the intended operation on the protected airspace established for the aerodrome.

A structure of any height could constitute an obstacle to air navigation if it is of greater height than an obstacle limitation surface, an obstacle protection surface, or a height within a runway approach area, a runway departure area or a circling approach area, which would result in the vertical distance between any point on the object and the established minimum instrument flight altitude or height as specified for the aerodrome concerned in the "AIP Ireland" within that area to be less than the required obstacle clearance. The analysis of the significance of such obstacles may have to be determined by an aeronautical study in accordance with [S.I. 215 of 2005, Irish Aviation Authority \(Obstacles to Aircraft in Flight\)](#).

Additionally, any person who seeks to erect a manmade object in excess of 45 metres anywhere within the state above ground or water surface level must also notify the IAA AUSD of the intended crane erection **at least thirty days** in advance, as a crane operating at or above this height may constitute an obstacle to air navigation. The IAA AUSD can be contacted via ausd@iaa.ie.

Please be advised that, in accordance with [Section 74 of the Irish Aviation Authority Act of 1993](#), a person who fails to comply with this requirement may be guilty of an offence, and may be liable on summary conviction, to a fine not exceeding €5,000 or to imprisonment for a term not exceeding 6 months or to both, or on conviction on indictment, to a fine not exceeding €500,000 or to imprisonment for a term not exceeding 3 years or to both.

The State requires electronic terrain and obstacle data (eTOD) in accordance with International Civil Aviation Organisation (ICAO) [Annex 15](#) requirements which shall be surveyed by [SLC Geomatic Solutions Ltd. \(SLC\)](#). The cost of this SLC surveyed data is to be borne by the developer. Additionally, the following data is to be supplied once construction is planned or commenced or available to the Airspace & U-Space team via ausd@iaa.ie:

- The WGS84 coordinates (In degrees, minutes and seconds) for each turbine?
- Height above ground level (to blade tip) and elevation above mean sea level (to blade tip)?
- Verification if it's a standalone wind farm or is merged with others. Does the wind farm have any alternative names?
- Horizontal extent (rotor diameter) of turbines and blade length where applicable?
- Lighting of the wind farm, which turbine(s) is/are lit, and what type of lighting?

ICAO Light Type	Colour
Low-intensity Type A (fixed obstacle)	Red
Low-intensity Type B (fixed obstacle)	Red
Low-intensity Type C (mobile obstacle)	Yellow/Blue
Low-intensity Type D (follow-me vehicle)	Yellow
Low-intensity Type E	Red
Medium-intensity Type A	White
Medium-intensity Type B	Red
Medium-intensity Type C	Red
High-intensity Type A	White
High-intensity Type B	White

If you have any questions, please don't hesitate to contact the Airspace & U-Space team at ausd@iaa.ie.

Kind regards,

[Redacted]

[Redacted]

[Redacted]

M: [Redacted] | T: (01) 603 1196

E: [Redacted] | www.iaa.ie

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



From: [REDACTED]

Sent: Tuesday 3 December 2024 14:36

To: Planning <planning@iaa.ie>; planning@airnav.ie; Airspace and U Space division <ausd@iaa.ie>

Cc: [REDACTED]

Subject: Proposed Lissinagroagh Wind Farm Consultation

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

To Whom It May Concern,

FuturEnergy Ireland DAC proposes to develop a wind farm north of Manorhamilton in County Leitrim approximately 3 km south of the Northern Ireland border in County Fermanagh. The project will involve the development of a wind farm and all associated infrastructure including turbine foundations, hardstanding areas, borrow pits, access tracks, a 110kV electrical substation and an underground grid connection.

FuturEnergy Ireland DAC have commenced the process of Environmental Impact Assessment (EIA). The proposed wind farm site entrance, layout design and access points through which turbine components and construction deliveries may be made will be refined by the design team in consultation with the relevant planning authority and the local community. Detailed surveys and studies are currently being undertaken at the site and surrounding area and a project website has been established (<https://lissinagroaghwindfarm.ie/>). A team of technical experts are currently engaged in the process of scoping the environmental assessments for the project.

We invite you to submit any relevant information that you may hold and/or highlight any issues that you feel should be directed to the project team. Please see the enclosed EIA Scoping Document for further information (updated from the previously issued 2021 scoping report). Views/comments on the proposal can be submitted by email or letter to the undersigned as soon as convenient to ensure your views/comments are considered.

We request that submissions are provided before 5pm on Friday 24th January 2025.

Regards,
[REDACTED]

Notice of Upcoming Leave from Friday 13th December – 3rd January

[REDACTED]
TOBIN

Galway | Dublin | Castlebar | Limerick | Sligo

Telephone: +353 (0)1 8030401

Email: [REDACTED]

Website: <http://www.tobin.ie>

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- 2022 Association of Consulting Engineers of Ireland Awards Winner: Innovation*
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- 2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)*
- 2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year*

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===== PLEASE

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Registered Number: 211082 Place of Registration: Ireland A limited liability company

=====

=====

From: [REDACTED]
Sent: Friday 16 July 2021 17:21
To: [REDACTED]
Subject: FW: Reply from Inland Fisheries Ireland - Tobin Consulting - Lissinagroagh Wind Farm - EIA Scoping
Attachments: [tobin-l-wf-0621.docx](#)

All

Please see the attached consultation response from IFI on Lissinagroagh,

Can you please consider in your respective field and advise if additional survey work is required to address. If so, can you please confirm before the end of next week and advise costs for same.

Electrofishing is an obvious one that is referenced in this letter. Aine has some recent quotes for same.

Sinead - can you please also revisit the memo you prepared previously for water crossing as I think this is an area our ecology/hydrology team need to work closely on to development a joint robust position a on how we are going to manage impacts generally on this project to the satisfaction of IPI. If you can re-circulate that memo to all on this team would be appreciated.

We should be looking to update the above memo in the next month (and possible widen its scope to address other wind farm construction issues) and be aiming to meet with IPI to discuss the project before the end of August. It would be good it is a joint approach me/ecology/hydrology meeting IPI.

Can we please review next week and perhaps have a call to discuss on the 26th. I have put a provisional meeting in the diary For 2pm but if another time suits then please advise.

Thanks,
[REDACTED]

From: CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>
Sent: Tuesday 15 June 2021 16:58
To: [REDACTED]
Cc: CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>
Subject: Reply from Inland Fisheries Ireland - Tobin Consulting - Lissinagroagh Wind Farm - EIA Scoping

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Good afternoon [REDACTED]

Please see attached and below a reply from [REDACTED] [REDACTED] in behalf of Inland Fisheries Ireland for the subject below. Please forward an acknowledgement of receipt to CorporateSupport.Unit@decc.gov.ie at your earliest convenience.

Yours sincerely,

[REDACTED]
[REDACTED]
Department of Environment, Climate and Communications.
[REDACTED]

From: [REDACTED]
Sent: 15 June 2021 10:59
To: CorporateSupport.Unit
Cc: [REDACTED]
Subject: Tobin Consulting - Lissinagroagh Wind Farm - EIA Scoping

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To [REDACTED]

Please find attached IFI submission for the Lissinagroagh Wind Farm EIA scoping.

Kind Regards

[REDACTED]

Iascach Intíre Éireann
Inland Fisheries Ireland

Tel [REDACTED]

Mob [REDACTED]

Fax [REDACTED]

Email [REDACTED]

Web www.fisheriesireland.ie

Ardnaree House, Abbey Street, Ballina, Co. Mayo, Ireland F26 K029

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Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach. Deimhnítear leis seo freisin nár aims odh víreas sa phost seo tar éis a scanadh.

██████████
TOBIN Consulting Engineers
Market Square
Castlebar
Co. Mayo



Iascach Iníre Éireann
Inland Fisheries Ireland

15th June 2021

Re: - Lissinagroagh Wind Farm - EIA Scoping Report

Dear Sir/Madam,

Inland Fisheries Ireland (IFI) is the state body responsible for the protection, management and conservation of the inland fisheries and sea angling resource in Ireland. Protection of the aquatic environment and habitat is a vitally important element of IFI's work.

The proposed site crosses three catchments; The Ballagh River/Sraduffly River/Lough Melvin catchment, the Glenfarne River/Lough Macnean catchment and the Owenmore River//Lough Gill catchment. These catchments are within two IFI operational areas, IFI Western RBD, Ballina and IFI Nothwestern RBD, Ballyshannon. This is a joint submission from both RBD's, however all correspondence should be sent to both the undersigned at the addresses below.

Lough Melvin is an important fishery and provides habitat for a range of wild brown trout, artic charr and salmon with these species spawning in its tributary stream. This site lies adjacent to the Lough Melvin Special Area of Conservation which is designated for the protection of Atlantic salmon. The rivers flowing into Lough Melvin have not been allocated ecological status in the River Basin Management Plan but Lough Melvin has been allocated moderate ecological status and this must be improved to good to comply with the Water Framework Directive.

The Glenfarne River flows into Lough Macnean upper which provides habitat for perch and roach. The watercourses in this catchment have been allocated good ecological status in the river basin management plan and this status must be protected.

The Owenmore River provides salmon and trout spawning and nursery habitat for the Bonet River/Lough Gill fisheries and forms part of the Lough Gill Special Area of Conservation which is designated for the protection of Atlantic salmon, white-clawed crayfish and lamprey species. All but two of the Owenmore River tributaries have been allocated good ecological status in the river basin management plan. The good ecological status waterbodies must be protected and the moderate status watercourses must be improved to good status to comply with the Water Framework Directive.

The EIS should assess the potential impacts the proposed development may have including, damage to the aquatic and associated riparian habitat, pollution of water, introduction of non-native species and interference with upstream and downstream movement of aquatic life. The assessment should include all aspects of the development, which includes the development of up to 20 no. wind turbines, turbine foundations, hardstanding areas, borrow pits, access tracks, electrical substation, grid connection, facilitating works on the public road network and at private properties to accommodate the delivery of turbine components and forestry activity etc.

It is noted that the applicant intends to apply under the Strategic Infrastructure Development. Please find below IFI recommendations in relation to the proposed windfarm development EIA:

1. All watercourses that will receive drainage from the construction site including the turbines or the access roads must be assessed in terms of aquatic biodiversity with particular emphasis on fish, the food of fish, spawning grounds and fish habitat in general. Invertebrate sampling is recommended.



2. Electrofishing surveys will be required for all waters. Quantitative data in relation to all fish species should be compiled. The presence of salmonid species, crayfish and lamprey species should be assessed. It is noted that an Aquatic Fisheries Surveys was conducted in September 2020.
3. The aquatic habitat and physical nature of any watercourse affected by the development must be fully described in detail. This includes areas of open water, pool riffle glide sequences, density and types of aquatic vegetation, description of riparian zones to depth of at least 10 metres on either bank etc. The extent of the surveys should be sufficiently long enough so as to be representative of the habitat contained in that watercourse. There should be a particular focus on sections upstream and downstream of any point where an impact on the watercourse is likely to arise. Surveys of un-impacted (control) streams should also be included in the Environmental Impact Assessment.
4. A construction and operational phase water quality and habitat monitoring programme must be put in place. The monitoring of all surface flows during construction is essential and remote sensing equipment should be considered as a normal precaution and extended into the post construction phase.
5. The riparian habitat is integral to the functioning of the aquatic environment. The potential impacts of the development on the riparian habitat should be assessed. Adequately sized aquatic buffer zones must be established along all watercourses. IFI recommends a minimum width of 15metres from a minor watercourse to low risk parts of the construction site with larger buffer zones required for more sensitive habitats and higher risk operations.
6. A detailed geotechnical survey must be carried out and the potential for soil movement and landslides should be assessed fully for all areas of the site and all proposed activities including borrow pits, peat deposition sites, settlement ponds, turbines and access roads. The impact these works will have either directly or by vibration on the stability of the soils should be assessed.
7. Assessment of the impacts on the hydrology of the site must be carried out particularly where excavations including excavations for road construction are being proposed. It is important that natural flow paths are not interrupted or diverted in such a manner as to give rise to erosion. The proposed site crosses three catchments, there must be no diversion of waters from one catchment into another. Consideration should be afforded to the likely increase in surface water flow from the site which has the potential to alter the downstream prevailing hydrological regime and impact on the fisheries resource. In this regard attenuation measures should be identified and implemented in the surface water drainage plan.
8. The impact of site drainage must be assessed including the pumping of waters from excavations such as turbine excavations. Settlement ponds and other silt treatment/mitigation measures must be engineered to ensure sufficient retention times are provided for sediment settlement. The silt traps should be designed to minimise the movement of silt especially during intense precipitation events where silt traps maybe hydraulically overloaded. It is essential that they are located with good access to facilitate monitoring, sampling and maintenance. A license to discharge to waters may be required from the local authority.



9. Road construction and surfacing materials used must be of adequate strength so as not to give rise to silt/fine solids discharges due to the action of traffic and erosion. Roadside drains should not intercept large volumes of water from ground above. Any watercourse, however small that is intercepted by the access routes should preferably be bridged or culverted at that point. The use of fords must be avoided. Culverts should be of a size sufficient to avoid overloading, blocking or washout. The profile of any stream that is crossed must remain the same and any fish movement remain unhindered. Shooting velocities must be avoided. Floating roads must be considered where any peat encountered is one metre or more in depth. Piling may be considered for turbine bases at deep peat locations and these bases should be a minimum 50 metres from watercourses. This separation distance must be increased where fisheries sensitive waters occur.
10. Erosion of roadside embankments and cuttings should be avoided by using intercepting trenches or terracing. Embankments and cuttings should be kept at no greater slope than the normal angle of repose to encourage re-vegetation, otherwise added stabilisation may be required. It is essential that silt traps and settlement ponds are utilised and are capable of settling out materials prior to discharge off site. These ponds must take into account high precipitation events and designed accordingly, incorporating other treatment measures where necessary. The traps and ponds must be regularly inspected and maintained as required.
11. Track rutting by machinery movement must be kept to a minimum and no discharge or run off containing high sediment loads must occur from the site. In this regard a contingency plan should be established and strictly adhered to. Any stockpiling of peat or other site materials will require careful management to ensure that slippage or collapse to any adjacent watercourses will not occur. A construction methodology is recommended prior to any works commencing with a view to, among others, minimising the volumes of excavation that will be required.
12. Watercourse crossings existing on site or along the proposed delivery routes must be assessed to determine if works will be required to facilitate site access and the potential impacts of such works. The locations and design of any proposed new watercourse crossings should be provided. IFI requests consultation in relation to the design; length, slope and width of any instream structure, temporary or permanent. Clear span structures such as Bailey bridges should be used where possible. There must be no negative impact on fish passage as a result of the proposed development.
13. All instream works or other works which may impact directly on a watercourse should only be carried out during the open season which is from 1st July to 30th of September (so as to avoid impacting on the aquatic habitat during the spawning season.) It would be important that this is included in the contract for construction.
14. Should works be approved a detailed method statement addressing the issues outlined above, including all mitigations measures, precautions and environmental incident procedures must be forwarded to Inland Fisheries Ireland before works commence.
15. There must be no spread of invasive species as a result of the proposed development. A survey for the presence of invasive species should be carried out and a management plan put in place where found.



**Iascach Intíre Éireann
Inland Fisheries Ireland**

16. The IFI publication: Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites should be followed. <https://www.fisheriesireland.ie/documents/624-guidelines-on-protection-of-fisheries-during-construction-works-in-and-adjacent-to-waters/file.html>
17. Oil or fuel stored in or adjacent to the construction site, must be kept in a bunded area (providing 110% capacity of the largest storage unit), 100m from any watercourse which appears on a 6" O.S. map of the site. Vehicle maintenance should not occur within 100m of any watercourse and all machinery must be in good working order, free from any leakage of fuel, oil or hydraulic fluid.
18. During the construction period cement and wet concrete must be kept out of all watercourses and drains. Concrete trucks must not wash out on site. These materials are extremely toxic to aquatic life and the construction team must be made fully aware of this. This will be especially important during the construction of the turbine bases.
19. It is recommended that a suitably qualified person be on site for the duration of works to ensure:
 - a. All mitigation measures identified are implemented prior to and during the construction phase, as appropriate. This is essential in relation to possible peat shear.
 - b. Continual assessment to ensure the mitigation measures are effective including assessment of adjacent peats for cracking/instability.
 - c. Cessation of works should slippage indicators develop and/or settlement arrangements are inadequate for suspended solid removal in surface waters.
 - d. Peat reinstatement is completed according to a detailed restoration plan.
 - e. Arrangements are established in relation to a contact protocol for the relevant statutory bodies on progress of works.

In summary IFI request the following to be addressed:

- Water quality
- Surface water hydrology
- Fish spawning and nursery areas
- Passage of migratory fish
- Areas of natural heritage importance
- Biological diversity, ecosystem structure and functioning
- Sport and commercial fishing and angling
- Sediment transport

IFI looks forward to further consultation in relation to this development in due course.

Yours sincerely

Abbey Street
Ballina
Co. Mayo
tobin-l-wf-0621

Station Road
Ballyshannon
Co. Donegal



Iascach Iníre Éireann
Inland Fisheries Ireland



Sinead Ryan

From: Planning <Planning@water.ie>
Sent: Thursday 9 January 2025 10:33
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Proposed Lissinagroagh Wind Farm Consultation
Attachments: Irish Water Response_EIAR_Lissinagroagh Wind Farm_ Leitrim.pdf

Follow Up Flag: Follow up
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Dear Sir/Madam,

In response to a referral for an Environmental Impact Assessment (EIA) scoping request relating to Proposed Lissinagroagh Wind Farm Plant in County Leitrim.

Please find attached Uisce Éireann's observations.

I hope you find this information helpful. If you have any queries please do not hesitate to contact me.

Kind regards,

[REDACTED]

Uisce Éireann
Teach Colvill, 24–26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86, Éire Uisce Éireann Colvill House, 24–26 Talbot Street, Dublin 1, D01 NP86, Ireland T + 01 932 5582 M [REDACTED] jbloggs@water.ie
<https://scanner.topsec.com/?d=4369&r=auto&u=www.water.ie&t=b15c5d223a480f9f3060e6b24e9de022520d4ea>
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-----Original Message-----

From: [REDACTED]
Sent: Tuesday, December 3, 2024 2:45 PM
To: business@water.ie
Cc: [REDACTED]
Subject: Proposed Lissinagroagh Wind Farm Consultation

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To Whom It May Concern,

FuturEnergy Ireland DAC proposes to develop a wind farm north of Manorhamilton in County Leitrim approximately 3 km south of the Northern Ireland border in County Fermanagh. The project will involve the development of a wind farm and all associated infrastructure including turbine foundations, hardstanding areas, borrow pits, access tracks, a 110kV electrical substation and an underground grid connection.

FuturEnergy Ireland DAC have commenced the process of Environmental Impact Assessment (EIA). The proposed wind farm site entrance, layout design and access points through which turbine components and construction deliveries may be made will be refined by the design team in consultation with the relevant planning authority and the local community. Detailed surveys and studies are currently being undertaken at the site and surrounding area and a project website has been established

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We invite you to submit any relevant information that you may hold and/or highlight any issues that you feel should be directed to the project team. Please see the enclosed EIA Scoping Document for further information (updated from the previously issued 2021 scoping report). Views/comments on the proposal can be submitted by email or letter to the undersigned as soon as convenient to ensure your views/comments are considered.

We request that submissions are provided before 5pm on Friday 24th January 2025.

Regards,

[Redacted signature]

Notice of Upcoming Leave from Friday 13th December - 3rd January

[Redacted text]

TOBIN

Galway | Dublin | Castlebar | Limerick | Sligo

Telephone: [Redacted]

Email: [Redacted]

Website:

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[Blue letters on a black background Description automatically generated]

[A red and white sign with white text

Description automatically generated]

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2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)
2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year

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Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na tráchtála de a bheith mar chuid den fhaisnéis. Tá toirmeasc ar aon daoine nó aon eititis; nach dóibh siúd an fhaisnéis- aon athbhreithniú a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó aon ghníomh a bhraitheadh ar an bhfaisnéis seo a dhéanamh agus d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dlíteanas as aon ghníomh agus as aon iarmhairt bunaithe ar úsáid neamhúdraithe na faisnéise seo. Séanann Uisce Éireann dlíteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo agus séanann Uisce Éireann dlíteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scríos an t-ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truaillithe, idircheaptha agus i leith leasuithe neamhúdraithe. Séanann Uisce Éireann aon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo nó as aon dochar do chórais na bhfaighteoírí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith á dhéanamh ar theachtaireachtaí chuig Uisce Éireann agus ó Uisce Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éireann atá faoi theorainn scaireanna, a bunaíodh de bhun fhorálacha na n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

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Thank you for your attention.

Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na tráchtála de a bheith mar chuid den fhaisnéis. Tá toirmeasc ar aon daoine nó aon eititis; nach dóibh siúd an fhaisnéis- aon athbhreithniú a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó aon ghníomh a bhraithfeadh ar an bhfaisnéis seo a dhéanamh agus d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dliteanas as aon ghníomh agus as aon iarmhairt bunaithe ar úsáid neamhúdaraíthe na faisnéise seo. Séanann Uisce Éireann dliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo agus séanann Uisce Éireann dliteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scríos an t-ábhar ó gach aon ríomhaire.

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Thank you for your attention.

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14th July 2021

Re: EIAR Scoping Request – Coillte proposed Lissinagroagh Wind Farm near Manorhamilton in County Leitrim.

Dear [REDACTED]

Irish Water (IW) has received notification of your request in respect of the Environmental Impact Assessment Report (EIAR) scoping for the proposed Wind Farm in Co. Leitrim.

Please see attached our suggested scope in relation to Water Services. On receipt of the planning referral, Irish Water will review the EIAR as part of the planning process

Queries relating to the terms and observations above should be directed to planning@water.ie

Yours sincerely,

Signed on behalf of Irish Water:

[REDACTED]

[REDACTED]

Response to EIAR Scoping Report Requests

IW currently does not have the capacity to advise on scoping of individual projects. However, in general we would like the following aspects of Water Services to be considered in the scope of an EIAR where relevant;

- a) Impacts of the development on the capacity of water services (do existing water services have the capacity to cater for the new development if required). This is confirmed by IW in the form of a Confirmation of Feasibility (COF). If a development will require a connection to either a public water supply or sewage collection system the developer is advised to submit a Pre Connection Enquiry (PCE) enquiry to IW to determine the feasibility of connection to the Irish Water network. All pre-connection enquiry forms are available from <https://www.water.ie/connections/get-connected/>
- b) Where the development proposal has the potential to impact an IW Drinking Water Source the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to IWs Drinking Water Source during construction and operational phases of the development. It is a requirement of the Water Framework Directive that waters used for the abstraction of drinking water are protected so as to avoid deterioration in quality.
- c) Any up-grading of water services infrastructure that would be required to accommodate the development.
- d) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an IW collection network
- e) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks & potential measures to minimise/stop surface waters from combined sewers
- f) Any physical impact on IW assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets
- g) If you are considering a development proposal, it is best practice to contact us in advance of designing your proposal to determine the location of public water services assets. Details, where known, can be obtained by emailing an Ordinance Survey map identifying the proposed location of your intended development to datarequests@water.ie. Other indicators or methodologies for identifying infrastructure located within your lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- h) Any potential impacts on the assimilative capacity of receiving waters in relation to IW discharge outfalls including changes in dispersion /circulation characterises
- i) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (and resultant potential impact on

the capacity of the source) or the potential of the development to influence/present a risk to the quality of the water abstracted by IW for public supply.

- j) Where a development proposes to connect to an IW network and that network either abstracts water from or discharges waste water to a “protected”/sensitive area, consideration as to whether the integrity of the site/conservation objectives of the site would be compromised.
- k) Mitigation measures in relation to any of the above ensuring a zero risk to any IW drinking water sources (Surface and Ground water).

This is not an exhaustive list.

Please note

- The Confirmation of Feasibility from IW, to the applicant, should be issued prior to applying for planning permission.
- Irish Water will not accept new surface water discharges to combined sewer networks

From: [REDACTED]
Sent: Friday 3 January 2025 12:51
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Proposed Lissinagroagh Wind Farm Consultation

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Hi [REDACTED] and Happy New Year to you.

I will be dealing with this matter on behalf of the Local Authority and will revert back to you in due course within the timeline outlined therein.

You may not be aware, but we had to deal with a Notice of Motion at the December 16th Manorhamilton Municipal District meeting last month directly in relation to windfarms in this general area. I will copy you with the Notice of Motion and our response below. This matter has not been decided on and is deferred to this month's meeting (January 27th). At the meeting in December, I made the Members aware of our role within a SID application and that we had been requested to send our comments to an EIA Scoping Document by late January 2025. This prompted considerable interest and the Members asked if they were able to have sight of this Scoping Document? I indicated that this was a matter for the Executive to comment on the Scoping Document but I would ask the project promoters if they would consent to the release of this document. If released, we have no control over where it would end up and I would expect it to be made available to the Save Dough Mountain grouping which has become established. We have received comments from this group which they are requested we include in our review of the Scoping Document following the meeting. We have advised that it would enjoy the same confidentiality of a pre application consultation document which would not become a public document until such time as the application has been lodged. This was challenged in that it is not a planning application to us and would not enjoy the same privileges. I am not sure where we would stand on an Access to Information on the Environment request should they decide to go down that route.

You might advise whether or not the promoter's would consent to the release of this document please.

Motion No. 3

We the members of Manorhamilton Municipal District, ask Leitrim County Council to revise the current wording in the Leitrim CDP (2023–2029) concerning the exemption of Arroo Mountain range from wind turbine development to explicitly prohibit wind turbine development in all parts of the Arroo Mountain range, including Dough Mountain, ensuring clear, comprehensive protection from industrial development.

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The plan designates Arroo Mountain range as exempt from such development, it ambiguously states that areas to the east of Arroo, including Dough Mountain, "may be

considered” for wind turbine installations creating a loophole threatening the ecological integrity, cultural heritage, and landscape value of the entire mountain range.

Councillor James Gilmartin - 16/12/2024 (Municipal District Meeting (MN))

Reply

For clarity, the reference to Arroo Mountain range is in Section 3.2.3 LCA 4 Arroo and Mountain Outliers Summary and Recommendations of Appendix X – Part B – Landscape and Visual Capacity Study for Wind Farms and Wind Turbines. The narrative states:

[Edit](#)
[Reply](#)

The areas of search in the Arroo and Mountain Outliers LCA comprise upland landscapes, namely moorland plateaux, moorland hills and farmed foothills LCTs. These areas are generally open with little or no screening in views from the lower lying valleys and Lough Melvin. Landform varies from rolling, smooth rounded moorland hills to rugged mountain, cliffs and scree slopes which present as distinctive landforms throughout. The LCA overall is of some considerable scenic quality and would be highly sensitive to wind turbines. Some limited moorland areas in the vicinity of Dough Mountain, Thur Mountain and Saddle Hill may be considered subject to detailed design, having regard for landscape and visual constraints including potential cumulative effects with other wind turbines.

There are no parts of Co. Leitrim where a wind energy development cannot be proposed and brought forward as a planning consent application, either directly to the Planning Authority or to An Bord Pleanála as a Strategic Infrastructure Development. No Development Plan can seek to prohibit certain types of development from an area as all objectives must be positive in their outlook. Any reading of our County Development Plan 2023-2029 to include the Renewable Energy Strategy and its accompanying document Appendix X – Part B – Landscape and Visual Capacity Study for Wind Farms and Wind Turbines which would conclude that any parts of our county are excluded from consideration for wind energy projects is mistaken.

The central aim of the sieve mapping and technical analysis undertaken was to highlight areas of the county with the potential to accommodate wind energy development identified as ‘Available Areas’ in Figures 6.3 and 6.3b of the County Leitrim Renewable Energy Strategy, subject to significant landscape/visual constraints amongst other environmental considerations. In addition, to supplement and inform the County Leitrim Renewable Energy Strategy, a robust Landscape and Visual Capacity Study was undertaken to specifically evaluate the respective capacities of various landscapes in the county to potentially accommodate wind energy development proposals. The capacity study concludes that there is very limited capacity to absorb any such developments in the form of multiple wind turbines and wind farms. The assessment was undertaken by the same consultancy who prepared the Landscape Character Assessment, Landscape Designations to include Areas of Outstanding Natural Beauty and Areas of High Visual Amenity, Protected Views and Prospects. The consultant also undertook the Landscape Capacity Study for Commercial Forestry. There is simply no basis to undertake a review of this assessment as the assessment undertaken was done by competent professionals operating in an objective manner.

Moreover, it is important to refer to Section 6.1.5 Potential Resources of the Renewable Energy Strategy which states

The capacity study concludes that although scope for future wind energy development would be limited, each planning application for proposed development of this kind would have to be

judged individually on its own merits with reference to a landscape and visual impact assessment (LVIA) report undertaken in line with current good practice guidance by an appropriately qualified landscape architect. The LVIA would also demonstrate that the design of the proposed development, in terms of turbine number, hub height, tip height and siting of individual wind turbines has regard for the baseline landscape character and visual amenity of the study area in which the development would be located.

In the Summary and Conclusions (section 4), it states

The capacity study concludes overall that the areas of search comprise landscapes of considerable scenic quality for which, the introduction of wind turbines and wind farms would, in many cases, result in likely significant effects. However, each future planning application for proposed development of this kind would have to be judged individually on its own merits with reference to a landscape and visual impact assessment report (LVIA) undertaken in line with best practice guidance by an appropriately qualified landscape architect. The LVIA would also demonstrate that the design of the proposed development, in terms of number, hub height, tip height and siting of individual wind turbines has regard for the baseline landscape character and visual amenity of the study area in which the development would be located.

This narrative is replicated in Section 12.6.2 Wind Energy of Volume I Written Statement of the County Development Plan 2023-2029.

The Planning Department would advise the Municipal District members that there was a high profile case involving Glencar Exploration v. Mayo County Council 1992 after the Council, against the advice of the Executive, included a mining ban, centred on Croagh Patrick, extending to approximately 300 square miles in the County Development Plan. Glencar Exploration had incurred significant expenses on exploration activities and suffered a collapse in confidence (and share price) following the mining ban. A claim of damages was brought against the Council of over £1.9 million. The High Court found that the mining ban was imposed negligently and unnecessarily but dismissed the plaintiffs claim for damages against the Council. Mr Justice Blaney held that the mining ban was ultra vires because it was entirely negative in character and therefore could not properly be regarded as a planning objective.

The Planning Department would strongly oppose the suggested variation as it cannot be acceded to as there can be no prohibiting objectives included in a County Development Plan. To propose a variation to counter any development proposal in the area would be reactive and would, in the opinion of the Planning Department, not withstand a legal challenge. It is also respectfully outlined that it is only the full Council who could request a variation to the County Development Plan and not a Municipal District. Three quarters of the membership of the full Council would be required to submit a resolution to the manager of the Planning Authority requesting the preparation of a report on a proposal by them to initiate a process to consider the variation of the County Development Plan. It is respectfully considered that such matters should be brought for discussion to the appropriate Strategic Policy Committee when it is convened.

Reply By: Bernard Greene Date of Reply: 10/12/2024 13:50:37

From: [REDACTED]
Sent: Tuesday 3 December 2024 14:09
To: planning <planning@leitrimcoco.ie>; Roads <roads@leitrimcoco.ie>
Cc: [REDACTED]
Subject: Proposed Lissinagroagh Wind Farm Consultation

To Whom It May Concern,

FuturEnergy Ireland DAC proposes to develop a wind farm north of Manorhamilton in County Leitrim approximately 3 km south of the Northern Ireland border in County Fermanagh. The project will involve the development of a wind farm and all associated infrastructure including turbine foundations, hardstanding areas, borrow pits, access tracks, a 110kV electrical substation and an underground grid connection.

FuturEnergy Ireland DAC have commenced the process of Environmental Impact Assessment (EIA). The proposed wind farm site entrance, layout design and access points through which turbine components and construction deliveries may be made will be refined by the design team in consultation with the relevant planning authority and the local community. Detailed surveys and studies are currently being undertaken at the site and surrounding area and a project website has been established (<https://lissinagroaghwindfarm.ie/>). A team of technical experts are currently engaged in the process of scoping the environmental assessments for the project.

We invite you to submit any relevant information that you may hold and/or highlight any issues that you feel should be directed to the project team. Please see the enclosed EIA Scoping Document for further information (updated from the previously issued 2021 scoping report). Views/comments on the proposal can be submitted by email or letter to the undersigned as soon as convenient to ensure your views/comments are considered.

We request that submissions are provided before 5pm on Friday 24th January 2025.

Regards,
[REDACTED]

Notice of Upcoming Leave from Friday 13th December – 3rd January

[REDACTED]
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Mr [REDACTED]
[REDACTED]

TOBIN Consultant Engineers

27th January 2025

RE: Proposed Lissinagroagh Wind Farm Consultation – EIA Scoping Report Request

Dear [REDACTED]

Leitrim County Council welcomes the opportunity to contribute to the scoping process and to ensure that the prospective EIA addresses all relevant issues. In response to your request, please now be advised that the following constitutes Leitrim County Council's written opinion on the information to be contained in the Environmental Impact Assessment Report to be prepared in respect of the above-mentioned proposed development.

The preparation of the EIA shall have regard to the guidance document, **Guidelines on the information to be contained in Environmental Impact Assessment Reports** (Environmental Protection Agency, 2022) in terms of the content and structure of the EIA and prescribed environmental factors. Moreover, the relevant assessments, conclusions, recommendations and proposed mitigation measures to be presented in the EIA shall be prepared by suitably qualified specialists within their respective environmental expertise.

Planning Policy Considerations

Any prospective planning application for the proposed development shall be assessed against the policies and objectives contained within the **Leitrim County Development Plan 2023-2029**. In this regard, the policies and objectives addressed in the following, but not exclusive, sections of the Plan are considered to be of particular relevance:

Section 2.2 – Vision and Strategic Aims sets out a range of strategic aims and complementary strategic objective for the sustainable development of the county, including “*development that addresses climate change in terms of adaptation and mitigation measures including increasing flood resilience, the promotion of sustainable transport options and the development of renewable energy technologies where possible to achieve a successful transition to a low carbon economy*”.

Section 4 – Economic Development – sets out the policy framework for the economic development of the county across a number of sectors including tourism, rural-based enterprise and employment, infrastructural and renewable energy.

Section 5 – Tourism contains a number of policies and objectives targeting tourism development within the county including the development of amenity and recreational assets/facilities and harnessing the county's natural and heritage resources in a sustainable manner for tourism activities. The views of prescribed bodies such as Fáilte Ireland are also recommended to be solicited in the preparation of any forthcoming EIA on this proposed development.



Comhairle Chontae Liatroma Leitrim County Council

Section 9 – Infrastructure and Energy – sets out the policy framework aimed at supporting and further developing the physical infrastructure within the county across a number of services such as water supply, wastewater, surface water and flood alleviation infrastructure, telecommunications and energy supply, including infrastructure associated with renewable energy development.

Section 10 – Rural Development – addresses a number of rural-based economy sectors including agriculture, forestry, extractive industries, and renewable energy.

Section 11 – Heritage & Biodiversity – addresses the built, cultural and heritage assets of the county and sets out the policy framework for the protection and sustainable management of such assets. This section also references two separate plans, the Leitrim Heritage Plan 2020-2025 and the Leitrim Biodiversity Action Plan 2022-2027, both of which should be referenced in any forthcoming EIAR. This section also addresses and provides policy content in relation to various land cover types within the county such as wetlands, woodlands/forestry areas and peatlands, with the latter highly relevant to the study area of the proposed development. Moreover, **Section 11.13 – Landscape** provides the policy framework for the conservation of landscape character areas, designated sensitive landscape and protected views and prospects. Related to this section, the applicant shall also have regard to the contents of the appendices to the Leitrim County Development Plan 2023-2029 which inform the policy framework provided in Section 11.13 of the Plan. Any landscape and visual impact assessment (LVIA) of the proposed wind energy development, including cumulative landscape and visual impacts of the proposed development in conjunction with existing and permitted wind energy developments, shall have regard to the policy provisions and guidance advice contained within the aforementioned documents.

Section 12 – Climate Action & Renewable Energy – addresses the various policy instruments associated with this development theme and sets out the various climate action measures, underpinned by a series of policies and objectives, aimed at mitigating and adapting to the effects of climate change. This includes policies and objectives relating to the renewable energy developments as informed by *Leitrim County Renewable Energy Strategy* and its companion document *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines* which together form **Appendix X** of the Plan. Any forthcoming EIAR shall have regard to these documents when assessing the potential environmental impacts of the proposed development, amongst other assessment considerations.

In respect of the *Leitrim County Renewable Energy Strategy (RES)*, the subject study area is within an identified 'Available Area' for commercial wind energy projects (>100ha) – see Figure 6.3 (b) of the RES – however, regard should also be had to the Risk Rating mapping analysis conducted in respect of larger sites (>500ha) as depicted in Figure 6.4 of the RES which includes the Study Area. The risk rating varies within this available area. Any assessment of the proposal on the receiving environment, including its conformity with renewable energy policy should take cognisance of the RES and its companion document, *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines*, as well as the policy framework provided in Section 12 of Volume I – *Written Statement of the Leitrim County Development Plan 2023-2029*.

Section 13 – Development Management Standards sets out the general Development Management principles and standards that will be applied by the Council to ensure that future



Comhairle Chontae Liatroma Leitrim County Council

development is in accordance with the policies and objectives set out elsewhere in the Plan. Development Management Standards specific to energy, telecommunications and services, including wind energy development, are set out in Section 13.20.

The Standards reiterate that when assessing planning applications for wind energy development, the Planning Authority shall have regard to the *'Wind Energy Development Guidelines for Planning Authorities'* (DoEHLG, 2006), and any updates to these Guidelines which may be made, and the *'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change'* (DoHPCLG, 2017), in addition to the policy and guidance provided in Section 12 of Volume I - Written Statement and Appendix X of the Plan.

In addition, the following will be considered by the Planning Authority in relation to any planning application for wind energy development:

- Impact on the visual amenities of the area.
- Impact on the residential amenities of the area.
- Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape.
- Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes.
- Impact on nature conservation, water quality, ecology, including an assessment of impacts on collision risk species (birds and bats), soil, hydrology, groundwater, air quality, archaeology, built heritage and public rights of way.
- Impact on ground conditions and geology.
- Impact on peat stability and robust geotechnical assessment of potential for peat slippage.
- Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines.
- Impact of development on the road network in the area.
- Impact on human health in relation to:
 - Noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region).
 - Shadow flicker (for wind turbine developments, including detailed Shadow Flicker Study).

This list is not exhaustive, and the Planning Authority may consider other requirements in relation to traffic and transport assessments, road safety audits/road safety impact assessments, access onto public roads, haul route assessment etc. Section 13 sets out development management standards in relation to such items and other considerations which should be consulted with in the preparation of any EIAR and planning application documentation associated with the proposed development.

Environmental and Ecological Considerations

The EIAR shall take account of all ecological sensitivities and of the likely environmental effects of the proposed development on the receiving environment. All in combination and cumulative effects of the proposed development within the zone of influence of the proposal are to be considered together with the following:



Comhairle Chontae Liatroma Leitrim County Council

1. **The Proposed Development** - to include information on the site, design, size and other relevant features of the proposed development. The proposed development should be described in scaled drawings, photographs and photomontages.
2. **The Existing Environment** - The existing environment and the impacts of the development are explained by reference to its possible impact on the following environmental factors:
 - Population, and Human Health
 - Biodiversity with particular attention to species and habitats protected under the Habitats and Birds Directives
 - Land, Soil, Water, Air and Climate
 - Material Assets, Cultural Heritage and the Landscape
 - The interaction between the above factors

In terms of the receiving environment, the EIAR shall include all areas that would be impacted upon, directly or indirectly, by the proposed development. The information contained in the EIAR should therefore be based on comprehensive surveys of the area and have regard to updated data bases which may exist in terms of heritage and ecology. The EIAR should accurately describe the receiving environment in terms of geology, geomorphology and hydrology, as well as a physical description of the site proposed for development.

3. **The Likely Significant Effects of the Proposed Development** - Impacts should address direct, indirect, secondary, cumulative, short, medium and long-term, permanent, temporary, positive and negative effects as well as impact interactions. None of the topics outlined above (Population and Human Health, etc.) should be omitted, although their level of detail may differ depending on the likelihood of impacts having regard to the remote setting of the proposed development and proximity to sensitive receptors.

In accordance with the requirements of Article 94 of the Planning and Development Regulations, 2001 (as amended), the EIAR shall contain a reference list detailing the sources used for the impact descriptions and assessments used in the EIAR.

The EIAR should also contain a list of experts who contributed to the development of the report, identifying for each expert, the part of the EIAR for which he/she/they is/are responsible, his/her/their experience or expertise and any additional information considered relevant to demonstrate the persons competence in the preparation of the EIAR.

An assessment of the impact of the proposed development is required, with an assessment of the cumulative impact of existing and permitted developments in the vicinity. The assessment of cumulative impacts in the EIAR should also have regard, as far as is practicable, to the likely effects arising from any future phases or extension of the proposed windfarm.

Further to the above, details of the environmental impacts of the development during the excavation, construction and operational phases of the development should also be described and assessed by reference to baseline information which should be collated and presented within the EIAR. The environmental impact of the aforementioned phases, including in particular noise and shadow flicker impacts arising from the operational phase and construction



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phase impacts in terms of materials storage and containment within the site should also be described and assessed.

The EIAR will be required to provide information regarding the nature, quantities and source of materials to be used in the overall development. Information will also be required on volumes and nature of waste materials likely to be generated in the construction phase and proposed means for disposal or relocation within the site boundaries of same.

The EIAR should also provide an assessment of the expected effects arising from the vulnerability of the project to major accidents and disasters that are relevant to the project. These risks should be considered in the context of the factors of the environment.

4. **The Measures to Mitigate Adverse Impacts** - The EIAR shall give a description of the features of the proposed development and measures envisaged to avoid, prevent, reduce and, if possible, offset likely significant adverse effects on the environment. Where adverse impacts are likely to result, appropriate mitigation measures shall be identified where necessary - and shall clearly indicate where and with whom responsibility for the implementation of the mitigation measures lies. The EIAR shall also provide information relating to the monitoring of the impacts of the development on the environment.
5. **The Consideration of Alternatives** - The consideration of alternatives, in terms of location and design, should also be addressed in the EIAR and should comprise a description of the reasonable alternatives relevant to the proposed development which were studied and the reason for the option chosen having regard to the effects on the environment. In undertaking this assessment of alternatives, the following should be borne in mind:
 - Alternatives should be relevant to the project and its specific characteristics.
 - The assessment of alternatives should include a description of the current state of the environment without implementing the project, i.e. the Do-Nothing scenario. This assessment should be the starting point for the consideration of impacts in the EIAR.
 - In the assessment of alternatives, the level of detail provided should be reasonable and commensurate with the project. The assessment will also include the main reasons for selecting the chosen option and shall include a comparison of the environmental effects of the reasonable alternatives.
6. **A Non-Technical Summary** - The EIAR must contain a non-technical summary of the detailed information contained within the EIAR. The language of this summary shall be non-technical in nature and should provide clear details of the environmental effects the development will have, as well as all significant effects and mitigation measures proposed. The description of the development in this summary should clearly explain and describe all aspects of the proposed development such that the EIAR is accessible in terms of public understanding of the process and to facilitate full public participation and consultation in the process.

In terms of specific environmental topics, the development is likely to impact upon, the EIAR should, in particular, address the following matters:

- Population, and Human Health



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- Biodiversity (for example fauna and flora),
- Land (for example land take), Soil (including organic matter, erosion, compaction, sealing), Water (for example hydro morphological changes, quantity and quality), Air and Climate (including greenhouse gas emissions, impacts relevant to adaptation),
- Material Assets, Cultural Heritage, (including archaeological aspects) and Landscape.
- Interactions between the above factors.

An outline of the specific issues considered relevant to the EIA under these headings is given in the following sections:

7. **Population, and Human Health**

As identified in the submitted Scoping Report, the scope of population and human health and the consideration of associated impacts extends to the assessment of those environmental factors which might lead to effects on human health (including noise, vibration, traffic and transportation, air quality, amenity, water quality & flood risk).

An assessment of the impact of the proposed development on any local recreational and tourist facilities and overall level of amenity and the potential impacts arising for population and human health should be addressed in the EIA.

8. **Biodiversity**

The EIA should provide a clear baseline assessment of the existing receiving environment and the impact of the development on the terrestrial and aquatic ecology of the receiving environment (including fisheries).

Whilst the study area does not appear to contain European sites, it is adjacent to the Lough Gill SAC (Site Code 001976) to the southwest with Arroo Mountain SAC (Site Code 001403) to the west of the R282 and Lough Melvin SAC (Site Code 000428) a similar distance to the northwest. There is therefore a need to carry out Screening for Appropriate Assessment under the Habitats Directive and further assessment if necessary. The results of such assessments will inform the Biodiversity section of the EIA. The Appropriate Assessment will need to focus on the potential impacts arising on the European sites arising from the operational and particularly the construction phases of the development. Potential adverse impacts on the conservation objectives for designated habitats arising from the proposed development require careful consideration and analysis based on best available techniques and underpinned by the precautionary principle in formulating any recommendations/conclusions stemming from such analysis.

Ornithology – Field survey methodologies should be carried out using survey standards recommended by NatureScot (formerly Scottish Natural Heritage (SNH), 2017), which are widely regarded as representing best practice in Ireland and carried out during suitable times of the year. Two full years of bird survey data, as recommended by current NatureScot (2017) guidance, should be undertaken in forming any analysis/assessment of the potential impacts of the proposed development in this regard.

The submitted Scoping Report states “*It should also be noted that the Dough/Thur Mountains Natural Heritage Area (NHA) is located adjacent to the eastern boundary of the wind farm site.*” No



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boundary has been provided to the Local Authority, just a study area outline. The inclusion of Dough / Mountain NHA (Site Code 002384) within the site study area is therefore of particular significance. This NHA contains an extensive area of upland blanket bog, with associated upland heath and grassland. Blanket bog habitat is a globally scarce resource. Upland blanket bogs, due to their exposure to severe climatic conditions at high elevations, are particularly vulnerable to erosion by human activities and extensive areas are currently undergoing active erosion due mainly to overgrazing. The current area of intact upland blanket bog in Ireland represents only a fraction of the original resource, due to the combined impacts of afforestation and overgrazing, and intact examples are therefore extremely valuable for nature conservation. Their long-term survival requires sensitive management. A large oligotrophic lake also occurs on the southern side of Thur Mountain. The impact of the proposed development on the NHA shall be clearly assessed as part of the EIAR.

In addition, please be advised that a proposed windfarm development was refused previously at Dough Mountain by An Bord Pleanála (ref. PL 12.234741 / LCC P09/260). The applicants were 'An Dough Windfarm limited' and the proposed development sought planning permission to erect a windfarm on a 140 hectare area close to the summit of Dough Mountain. The proposed development consisted of eight turbines, a transformer compound, an electrical control building, inter-turbine service roadways, eight hardstand areas and ancillary works such as underground electrical ducting, etc. Each turbine would have a three megawatt power rating. There will be a hardstand area at each turbine. The total power output capacity of the proposed windfarm was 24 megawatts. The turbines would be 80m in height and the rotor blades will be 45m each in length. An environmental impact statement formed part of the documentation required by this application.

Permission was refused by the Board for 2 no. stated reasons, the first of which is relevant in this context:

- 1) The site is located within the Dough/Thur Mountains Natural Heritage Area (number 2384) which comprises an extensive area of intact upland blanket bog in association with Dry and Wet Heath. Blanket Bog is listed in Annex I of the EU Habitats Directive 1992 and Active Blanket Bog is listed as a Priority Habitat. Having regard to the location of the proposed wind farm centrally within the proposed Natural Heritage Area near the summit of the hill, within an area of relatively intact bog, the depth of peat on the site, the slope of blanket bog and the wet nature of the bog, it is considered, on the basis of the information submitted with the planning application and the appeal, that the proposed development would pose an unacceptable risk of degradation of the priority habitat. Furthermore, the Board is not satisfied that the proposed development would not lead to surface pollution and risk of slope instability. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

The above reason shall be considered carefully in the preparation of the EIAR and the reason for refusal clearly addressed and mitigated.

The scope and nature of the ecological and related surveys should be reviewed with the NPWS section of the Department of Housing, Local Government and Heritage and with the IFI. The work should comply with best practice for seasonality and scope, and the various environmental



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directives, legislation and guidance documents should be complied with. The comments of the Development Applications Unit on these issues should be sought.

The EIAR should address the potential for the enhancement of the biodiversity of the site arising from the development and the measures undertaken to maximise these impacts.

The EIAR should contain an Invasive Species Management Plan to address the removal of any invasive species and prevent their spread, and the subsequent treatment of the affected areas. A Biosecurity Plan should be prepared.

Ecology inputs should be provided in the form of an Ecological Impact Assessment (ECIA) which would contain ornithological, aquatic, habitat and bat surveys. Bat, Mammal and ornithological surveys should be undertaken for 2 years to Scottish Natural Heritage standards.

Cumulative impacts with other developments, including but not limited to other wind farms, should be assessed for all sensitive receptors. Interactions with other environmental disciplines, especially hydrology and climate should also be assessed.

9. **Land, Soil and Geology**

Potential construction and operational impacts of the proposed development on the land, soils and geology of the subject site and wider area should be informed by extensive geotechnical, geological, hydrological and hydrogeological surveys by suitably qualified experts at varying times of the year.

The EIAR should provide information relating to the amount and description of materials disturbed or excavated on the site and proposals for the storage, reuse and disposal of material excavated or otherwise generated during the construction phase of development. The impact of excavations required as part of the development should describe, assess and mitigate the potential impact of the proposed development on existing sub surface services that may be present on the site. An assessment of the impact of such excavations or other ground disturbances should be provided.

The chapter shall provide details of the types and nature of materials imported to the site during construction together with construction methods to be employed and measures to prevent the importation of invasive species. Mitigation measures to prevent or minimize emissions from the site during the construction phase, should also be provided.

It is noted in the scoping report that the GSI's Landslide Susceptibility Mapping was used to assist in the identification of areas which are subject to landslides. The southern part of the study area has been identified to be low in landslide susceptibility whilst the central and northern part of the study area have been identified as moderate to high in landslide susceptibility. Without any sight of the layout of the proposed development, the Local Authority would remind TOBIN Consultant Engineers of the outcome of 2 recent applications for wind farm developments in Co. Leitrim which were refused planning permission by An Bord Pleanála. The relevant reference numbers are PL12.310789 / LCC 20/120 (applicants were Coillte CGA) and PL12.319480 / LCC 24/60008 (applicants were Letter Wind Farm Limited). The Local Authority would direct TOBINS to examine the decision and the relevant inspector's reports quite carefully with regard to



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landslide susceptibility, history of landslides in the vicinity of the site, the presence or otherwise of tension cracks present on or adjoining the site, rainfall levels, the upland and sloping nature of the site, the density of drainage channels throughout the site, the volumes of peat and other spoil material which will require excavation, handling, storage and management within the site, the stability associated with the movement and placement of such materials, the depth and nature of peat likely to be encountered, the drainage impact of such works on existing conditions and flow patterns, etc. The EIAR will have to demonstrate that the proposed development will adequately mitigate the risk associated with a potential landslide as a consequence of the development of the proposed wind farm, with potential for causing pollution of waterbodies within and in the vicinity of the site. Any proposed repositories would need to be demonstrated as being effective in providing for the permanent retention of peat and other materials and the mitigation measures, inclusive of the proposed drainage system, would be adequate to ensure the protection of the environment.

The applicants should be aware of a significant peat landslide event which occurred on the 28th of June 2020 on Shass Mountain, north of the study area (see report on this event at: <https://www.npws.ie/sites/default/files/publications/pdf/shass-mountain-landslide-report-october-2020.pdf>). Given the proximate location of this event to the subject site, in geological terms at least, and the severity of the impact of this event on the local environment, ecology and infrastructure as well as the remediation cost and impact on human population, significantly robust and extensive geotechnical and hydrogeological investigations should be undertaken and suitably documented in any submitted EIAR. Any recommendations/conclusions in relation to the potential impacts of the proposed development, borne out of the aforementioned extensive surveys and analysis, should be underpinned by the precautionary principle also.

10. Hydrology and Hydrogeology

Comprehensive geological, hydrological and hydrogeological assessments shall be undertaken as part of the EIAR study, including appropriate seasonal monitoring programmes/regimes in respect of surface water and groundwater regimes. The hydrology of the surrounding lands and peatlands needs to be given due consideration in any EIAR of the proposal as well as the potential of proposed drainage schemes to serve the proposed development on the wider receiving environment and cumulatively in conjunction with existing drainage schemes such as those associated with forestry sites in the locality. A robust and comprehensive assessment of the potential impacts of the proposed development on the water quality objectives of adjacent waterbodies shall be undertaken also.

It is considered that certain matters relevant to this section have been covered indirectly in previous sections. The study area contains a number of watercourses which includes the Rosfriar_010, Lattone_010, Cornavannoge_010, the Owenmore (Manorhamilton)_020). The latter has a direct hydrological link to the Lough Gill SAC. This is also important in the context of Appropriate Assessment.

The impact of materials to be excavated and/or stored on the site will require to be considered in terms of the potential impact on surface and ground waters in the area of the site. Changes to the existing ground surface will lead to alterations in surface water drainage patterns and the existing on-site surface water drainage regimes should be clarified as part of the EIAR and



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application documentation, and the impacts of the proposed development on these existing drainage networks should be clearly set out.

The impact of infrastructure to be installed on the site will require to be considered in terms of the potential impact on hydrological processes and local water course channels. This should be clarified as part of the EIAR and application documentation, and the impacts of the proposed development on prevailing flow patterns and channel morphology should be clearly set out.

Assessments regarding flood risk and drainage should detail and make provision for the accommodation of climate change impacts. Appropriate mitigation/drainage measures will be proposed/required to ensure there is no increase in runoff from the proposed development and therefore ensure no impact on existing watercourses or on potential flooding of the downstream catchments.

11. Air Quality

The EIAR shall identify, describe and assess the potential significant direct and indirect effects on air quality arising from the construction, operation and decommissioning of the proposed development and cumulatively with other projects.

The air monitoring station at Carrick-on-Shannon is closer to the site than either Cavan town or Letterkenny. The suitability of such urban centres for a site in a rural area is questioned.

This assessment shall identify the potential impact of the proposed wind farm on air quality within the study area. As the proposed site is in a rural area, the relevant EPA Air Quality would be considered Zone D. The Assessment should compile all data from Zone D stations to determine the current and historical air quality across the study area. There are a number of Zone D stations across the country which can be considered representative of the study area.

A desktop review of the study area should be undertaken to identify the locations and proximities of the nearest human receptors. Identification of relevant ecological receptors (e.g., European Sites network, (p)NHAs or sensitive habitats) should also be undertaken as part of baseline data-gathering, with reference to the ecology chapter(s) of the EIA. The potential for dust impacts from on-site activity throughout the construction and decommissioning phases should be assessed in this chapter with reference to the Dust Risk Assessment Methodology presented in the *NRA Guidelines for the Treatment of Air Quality during Planning and Construction of National Road Schemes* (NRA 2011). Traffic impacts associated with the construction will be assessed using the techniques outlined in the UK Design Manual for Roads and Bridges (DMRB). With regard to impacts on air, it is considered that this will be particularly relevant during the site preparation and construction phases of development. The EIAR should therefore provide appropriate and up-to-date baseline data and describe any mitigation measures deemed necessary to minimise adverse impacts on air quality in the vicinity of the site and to mitigate dust and airborne pollution.

12. Climate

The EIAR shall identify, describe and assess the potential significant direct and indirect effects on climate arising from the construction, operation and decommissioning of the proposed development and cumulatively with other projects.



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With regard to impacts on climate and greenhouse gas emissions, it is considered that this will be relevant during the construction phase of development. The EIAR should therefore provide appropriate and up-to-date baseline data and describe any mitigation measures deemed necessary to minimise greenhouse gas emissions

The EIAR shall consider an assessment of greenhouse gas emissions from embodied carbon in construction materials (steel, cement, etc.), transport of construction materials, site operations (including felling of trees) and worker transport which can all be quantified in order to estimate the greenhouse gas emissions of the construction phase of the proposed development. This assessment should be carried out using the UK Environment Agency's Carbon Calculator for Construction Activities.

In addition to the above, any tree felling and the potential disturbance of peat activities may also have a climate impact through net carbon losses to atmosphere. The Scottish Government published the methodology Calculating Carbon Savings from Wind Farms on Scottish Peatlands – A New Approach shall be used to inform the assessment. This methodology is specifically aimed at wind farms and for calculating the various routes for carbon losses during construction. This methodology will be applied to any wind farm to be developed in peat land areas.

The Scottish Government approach also specifies a methodology for calculating carbon gains from the operational wind farm as a result of the off set of fossil fuel derived energy. This method will be applied or modified as required to facilitate the quantification of carbon savings from the operational farms associated with the development and the resultant 'carbon payback period' for the project.

13. Shadow Flicker

The assessment of shadow flicker at neighbouring dwellings / sensitive receptors shall be based on not exceeding 30 hours-per-year or 30 minutes-per day. The assessment shall also consider the potential of revised guidance being adopted prior to a planning decision for the proposed development, such that the wind farm's SCADA control system could change a particular turbine's operating mode during certain necessary weather conditions which are required to cause shadow flicker occurrences. As such, the proposed development should be capable of being brought in line with updated guidance if required.

14. Material Assets

It is noted that it is not intended to include roads within this chapter which is at variance with the EPA Guidelines but not of any consequence as it is dealt with in Chapter 16 instead. This assessment shall examine the likely significant effects of the proposed development on land use and the physical resources in the environment.

15. Noise & Vibration

The EIAR shall be informed by comprehensive noise and vibration impact assessments for the construction, operational and decommissioning phases of the proposed development utilising a robust representation of sensitive receptors in the vicinity of the subject site to determine the likely significant effects of the proposed development, individually and cumulatively with other projects, such as other wind farms, on the receiving environment. Any such noise impact



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assessments shall be in accordance with the 2006 Wind Energy Development Guidelines, pending their replacement, and should have regard to the more detailed methodology set out in the 'Good Practice Guide [GPG] to the application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise' (Institute of Acoustics, 2013) with respect to the baseline survey methodology.

16. Landscape and Visual Impact Assessment

It is noted in Section 14.2 that in the case of this project, the blade tips will be over 100 m high and, thus, the minimum Zone of Theoretical Visibility radius required is 20 km from the outermost turbines of the proposed development. The Local Authority would question and indeed challenge the basis for such a determination to not have to extend to 25 km in order to incorporate features of national, and perhaps international renown.

The Leitrim Landscape Character Assessment would identify the wind farm within Landscape Character Area 4 – Arroo and Mountain Outliers. As correctly outlined in the EIAR Scoping report, the study area includes B3 – Dough Mountain 'Area of High Visual Amenity (HVA)'. The nearest 'Area of Outstanding Natural Beauty (AONB)' is located to the south of the current study area and is known as 'A6 – O'Donnell's Rock Boleybrack. Other nearby HVA's include 'B4 – Thur Mountain' and 'B5 – Lough McNeen Upper and environs' to the east of the study area and 'B2 – Lough Melvin, Glenaniff River and Environs' to the northwest of the study area. Other notable AONB designations which require to be considered include 'A2 – Lough Melvin North', 'A3 – Aroo, Glenade, Truskmore, Glencar and Environs' and 'A5 – Benbo'.

The **Landscape and Visual Capacity Study for Wind Farms and Wind Turbines** (LVCS) would summarise and contain the following recommendations for this Landscape Character Area:

The areas of search in the Arroo and Mountain Outliers LCA comprise upland landscapes, namely moorland plateaux, moorland hills and farmed foothills LCTs. These areas are generally open with little or no screening in views from the lower lying valleys and Lough Melvin. Landform varies from rolling, smooth rounded moorland hills to rugged mountain, cliffs and scree slopes which present as distinctive landforms throughout. The LCA overall is of some considerable scenic quality and would be highly sensitive to wind turbines. Some limited moorland areas in the vicinity of Dough Mountain and Saddle Hill may be considered subject to detailed design, having regard for landscape and visual constraints including potential cumulative effects with other wind turbines.

In Section 4 Summary and Conclusions (LVCS), it states the following:

The capacity study concludes overall that the areas of search comprise landscapes of considerable scenic quality for which, the introduction of wind turbines and wind farms would, in many cases, result in likely significant effects. However, each future planning application for proposed development of this kind would have to be judged individually on its own merits with reference to a landscape and visual impact assessment report (LVIA) undertaken in line with best practice guidance by an appropriately qualified landscape architect. The LVIA would also demonstrate that the design of the proposed development, in terms of number, hub height, tip height and siting of individual wind turbines has regard for the baseline landscape character and visual amenity of the study area in which the development would be located.



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As previously advised, the previous wind farm proposal at Dough Mountain was refused planning permission by An Bord Pleanála (ref. PL 12.234741 / LCC P09/260). The second reason for refusal was

- 2) The site is located in an elevated position on Dough Mountain, an area of high visual amenity within a designated scenic view as set out in the current development plan for the area. Having regard to the nature and extent of the proposed development close to the ridge line of the Mountain, which is a focal point for panoramic views over long and short distances, it is considered that the proposed development would constitute an unacceptable obtrusive feature on the landscape and would seriously injure the visual and recreational amenities of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Having regard to the current proposal which proposes a turbine tip height of 185m, which is 2.3 times taller than the previous unsuccessful proposal and in the absence of knowledge of the exact location proposed for the windfarm and individual turbines, the EIAR shall be cognisant of the visual sensitivities of the area and demonstrate the likely impact of the proposal in the receiving landscape. The assessment shall also consider the landscape character and landscape sensitivity and relevant wind energy capacity studies were published in the Leitrim County Development Plan 2023-2029. In this regard, the baseline shall consider landscapes within Co. Leitrim and adjoining counties together with designated landscapes, designated scenic routes and protected views and prospects.

The EIAR should include a description of the proposed planting and landscaping of the site to include materials, levels and plant species. This information should be augmented by a detailed landscaping and planting plan for the development.

The landscape section of the EIAR should include a series of photomontages or other forms of visual aid, and the views should be taken to and from identified sensitive receptors.

17. Cultural Heritage

The EIAR shall identify the likely significant impacts or effects which may arise from the proposed development on the archaeological, architectural (built) and cultural heritage resource and outline suitable mitigation measures, based on current information, which may be used to avoid, reduce or offset any likely significant adverse effects. Any such assessment should be undertaken by suitably qualified professionals and should address both the wind farm and grid connection elements of the proposed development to include construction (access routes, haul roads, etc), operation and decommissioning.

There are some recorded sites and archaeological features in the surrounding area. The reference numbers provided in Section 15.3 Sensitive Receptors should be re-examined. Although difficult to be definitive due to the scale of Figure 1.1, there seems to be a cluster of monuments at Cashelaveela townland at the southern extremity of the study area. There seems to be more than just 2 recorded monuments within the study area. The impact of the proposal on the Black Rigs Dyke which runs to the northeast of the study area shall also be considered. Given the nature and location of the subject site, it is likely that development could have potential impacts on the archaeological heritage of the area, including as yet undiscovered remains on land. The assessment shall include the interpretation of aerial photographs to be used in combination with historic mapping to map



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potential cultural heritage assets that may be investigated as part of the field survey. It is recommended that this issue be specifically investigated, and the results presented in the EIAR. The EIAR should assess the impact of the proposed development and potential cumulative impacts with other developments on the terrestrial archaeological heritage of the area.

Appropriate pre-construction land based archaeological impact assessments should be undertaken of any work that might impact cultural heritage.

The impact of the proposed development on the character and setting of any Protected Structures and NIAH Structures, and other similar structures located in the vicinity of the site should be included in the EIAR. It would not appear that there are such structures within the Study Area. The EIAR should assess the impact of the proposed development and potential cumulative impacts with other developments on the character and setting of any Protected Structures and NIAH Structures. Consideration should also be given to structures of architectural merit which are at a remove from the site, but which may be affected due to works associated with the proposed development. Structures of architectural merit should include those buildings and features which contribute to the character of the area, and which may or may not be included in the RPS and NIAH for the area. It is recommended that prior to finalization and submission of the EIAR that the Built Heritage Section of the Department of Housing, Local Government and Heritage would be consulted.

18. Traffic and Transport

The EIAR shall address traffic generated by the development, during the construction, operational and decommissioning phases, and should include information on the volume and type of traffic (including details of any unusually heavy or wide loads) likely to be generated during these phases of the development and the impact on all road junctions in the vicinity of the site. The EIAR should consider the environmental effects of such heavy traffic and should clearly provide details regarding proposed routes to and from the site, in particular during the site preparation and construction phases of the development. This shall include assessments / details of

- the existing road/bridge condition for the haul routes
- the impact on the various junctions with a particular emphasis on urban areas such as Manorhamilton
- the impact on existing vehicular traffic, pedestrians, and cyclists
- pinch points and locations where additional/private lands will be required for delivery of materials/components,
- the substation location for the connection and map of the proposed route of ducting from the wind farm,
- the existing services along the haul route and how the proposed ducting will be facilitated,
- permanent trench reinstatement details for the ducting
- culvert and bridge crossings for the ducting.

It is noted that a Traffic and Transportation Assessment Report will be appended to the EIAR.

19. Interaction of the Foregoing

The EIAR should include detailed consideration between the above factors were considered relevant.



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20. Risks of Major Accidents or Disasters

It is noted that there is no reference in the scoping report to the potential for major accidents or disasters occurring. The inclusion of such consideration is required in light of the recent Storm Éoywn. This assessment will consider the vulnerability of the proposed development to risks of major accidents and/or disasters and the potential for the proposed development to cause accidents and disasters and the subsequent risks to human health, cultural heritage or the environment.

Annex IV point 8 requires:

'A description of the expected significant adverse effects of the project on the environment deriving from the vulnerability of the project to risks of major accidents and/or disasters which are relevant to the project concerned.'

The Guidelines on the Information to be Contained in EIA Reports (EPA, 2022) elaborate on risk assessment further:

'To address unforeseen or unplanned effects the Directive further requires that the EIAR takes account of the vulnerability of the project to risk of major accidents and /or disasters relevant to the project concerned and that the EIAR therefore explicitly addresses this issue. The extent to which the effects of major accidents and / or disasters are examined in the EIAR should be guided by an assessment of the likelihood of their occurrence (risk) (section 3.7.3 of EPA, 2022).'

Conclusions

The applicant shall engage/liaise with the relevant authorities and regulatory bodies in relation to such assets to inform the preparation of the EIAR and associated planning consent application documentation, and detail agreed or suitable mitigation measures with the EIAR where impacts arise on such assets as a result of the proposed development.

It is respectfully requested that you take into consideration the comments listed above and liaise with other prescribed bodies and regulatory authorities with the relevant expertise in the above environmental factors in the preparation of the EIAR.

Is mise, le meas,

Yours sincerely,

[Redacted signature]

[Redacted name]

PLANNING DEPARTMENT



Comhairle Chontae Liatroma Leitrim County Council

ADDENDUM TO COMMENTS FROM LEITIM COUNTY COUNCIL

As advised under separate correspondence, the matter of the EIAR Scoping Request was brought up at a meeting of the Manorhamilton Municipal District in December last. Arising from this discussion, the Save Dough Mountain grouping made a submission to the Planning Authority with regard matters to be considered in the Environmental Impact Assessment Report (EIAR). Leitrim County Council is happy to accommodate the request from the local community with regard to the matters to be considered in the preparation of the EIAR for the proposed project. Certain matters contained therein are perhaps more relevant to Appropriate Assessment (points 2 & 5) whilst point no. 7 is possibly not of relevance to an EIAR but are still of importance to the ultimate planning consent process.

I attach for your information and consideration the details which were forwarded to us noting that the Planning Authority would support the inclusion of such considerations in the EIAR.

Dear Sir/Madam,

Save Dough Mountain wishes to formally raise concerns regarding significant environmental, ecological, and technical factors that require thorough assessment in relation to the proposed Lissinagroagh Wind Farm development by FuturEnergy Ireland DAC. Given the sensitivity of the Dough Mountain region, it is imperative that all relevant impacts are identified and addressed comprehensively to safeguard the local environment, biodiversity, and community interests.

We believe the following points must be incorporated into the Environmental Impact Assessment Report (EIAR) scoping report before it is finalised to ensure that it reflects the full scope of environmental sensitivities and potential impacts associated with the proposed development.

1. Subterranean Features and Undocumented Caves

The Dough Mountain region is known to contain undocumented caves and other karst features. These formations are part of a complex subterranean ecosystem that could be severely affected by construction activities, including excavation for turbine foundations and access roads.

Request: We urge a comprehensive geophysical and karst survey to identify and map all subterranean features, with appropriate mitigation measures to protect these ecosystems.

2. Topographical Considerations and Avian Impacts

The region's topography, including Dough Mountain's elevation of 460m and surrounding terrains, is central to understanding the potential impacts of wind turbine placement. When combined with turbine blade tip heights (up to 535m above sea level), the development poses significant risks to birds of prey and other avian species that traverse these altitudes.

Request: Accurate topographical modelling must be conducted to assess impacts on local biodiversity, including bird flight paths and potential microclimatic changes caused by turbine operations.



3. Peatland Management During Construction and Decommissioning

The proposed wind farm lies within a region characterised by extensive peatlands. Excavating, storing, and attempting to restore peat during construction and eventual decommissioning presents significant ecological and technical challenges.

Request: Clear, practical plans for peat extraction, storage, and rehabilitation must be developed, addressing the risks of peat destabilisation, erosion, and habitat loss. A long-term plan for the rehabilitation of disturbed peatland post-decommissioning is essential.

4. Hydrological Connectivity and Watercourse Impacts

The Dough Mountain region includes watercourses connected to sensitive ecosystems such as Lough Gill SAC and Lough Melvin SAC. Construction and operation of the wind farm could alter hydrological patterns, increase sedimentation, and introduce pollutants into these waterways.

Request: Detailed hydrological studies are needed to assess the project's impact on water quality and flow patterns, particularly downstream effects on designated Special Areas of Conservation (SACs).

5. Biodiversity Surveys and Cumulative Impact Assessment

The region supports species of conservation concern, including the Marsh Fritillary butterfly, Hen Harrier, and Buzzard. Existing ecological data appears incomplete, and cumulative impacts from other developments in the vicinity may not have been adequately considered.

Request: Comprehensive biodiversity surveys must be conducted to establish a full baseline for protected species, and cumulative impact assessments must be performed to evaluate the broader ecological implications of the wind farm.

6. Visual and Landscape Impact

The visual impact of the proposed development on the surrounding uplands, including Dough Mountain's natural heritage and scenic views, requires detailed evaluation. Given the project's scale, careful attention must be paid to landscape sensitivity and cultural heritage.

Request: Detailed visual impact assessments, including photomontages and Zones of Theoretical Visibility (ZTV) maps, should be produced to illustrate the project's effects on sensitive viewpoints and local landmarks.

7. Community and Public Engagement

Meaningful consultation with local stakeholders is essential to ensure transparency and address community concerns about the project's potential impacts.

Request: We encourage the implementation of a robust consultation process that includes workshops, public forums, and transparent reporting of feedback from local communities and landowners.



**Comhairle Chontae Liatroma
Leitrim County Council**

8. Economic Feasibility of Decommissioning

The long-term economic feasibility of decommissioning activities must account for inflation and future price fluctuations of materials. Reliance on "*current commodity prices*" to offset costs is speculative and insufficient.

Request: Financial assessments for decommissioning must be based on projected conditions at the end of the wind farm's lifecycle, with guarantees to ensure funds are available for full site restoration.

Conclusion and Recommendations

To ensure the integrity of the Environmental Impact Assessment process, Save Dough Mountain requests that Leitrim County Council:

1. Mandate comprehensive surveys for karst features and undocumented caves.
2. Require accurate topographical and biodiversity assessments with avian impact studies.
3. Insist on practical, ecologically sound plans for peatland management.
4. Ensure hydrological connectivity and downstream impacts are rigorously analysed.
5. Include cumulative ecological impact assessments in the EIAR.
6. Incorporate detailed visual impact studies and community engagement initiatives.
7. Base decommissioning cost assessments on future economic projections.

Failure to address these critical concerns may result in significant environmental harm and potential non-compliance with EU directives such as the Habitats Directive (92/43/EEC).

We trust that Leitrim County Council will give these points due consideration and take the necessary steps to ensure that any omissions are addressed comprehensively before any planning application is advanced.

We remain available for further discussions or clarifications on the points raised.

Yours sincerely,



Save Dough Mountain

[REDACTED]

From: [REDACTED]
Sent: Tuesday 6 July 2021 09:18
To: [REDACTED]
Cc: [REDACTED]
Subject: Love Leitrim Submission - Lissinagroagh Wind Farm EIAR Scoping Report
Attachments: Lissinagroagh WF EIA Scoping Report - LL Feedback.pdf

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[REDACTED]

Please confirm receipt of the attached document "Lissinagroagh WF EIA Scoping Report - LL Feedback.pdf"

Thanks.

[REDACTED]

[REDACTED]

CC [REDACTED]

CC [REDACTED]

[REDACTED]
Love Leitrim
Bee Park Community Centre, Manorhamilton, Co Leitrim
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
TOBIN Consulting Engineers

Re: Lissinagraogh Wind Farm EIAR Scoping Report (Doc Ref 10955-R-003)

As a listed body under section 9.1 of the scoping study, Love Leitrim are happy to provide feedback on the EIA scoping.

As the Secretary of Love Leitrim, I'd like to state for the record that Love Leitrim itself has no agreed policy on wind energy or on this project in particular. TOBIN nor Coillte nor any of its agents should rely on this feedback to infer support for or opposition to the EIA and the project. This position may change and our feedback to the EIA Scoping is being given without prejudice to that position.

Also, as a legal entity, we act as 'Communities for Environment First', CLG, an independent non-profit environmental NGO founded in 2013 with a primary objective of promoting environmental protection in the context of environmental law. Therefore, this submission is made for and on behalf of 'Communities for Environment First' as part of the Love Leitrim community group.

The headings under which we wish to make comment are listed below:

Section 1.3 Purpose of EIA Scoping

- This report cites the European Commission's "Guidance on EIA Scoping" (EU 2001) to establish the standards, scope, and purpose of EIAs. This report is obsolete, as it has been superseded by "Environmental Impact Assessment of Projects Guidance on Scoping (Directive 2011/92/EU as amended by 2014/52/EU)" (EU 2017). The scoping study deviates from EU 2017 in the following ways:
 - The scoping study should be made available publicly, not just to a list of stakeholders identified by the developer. We believe that the website and newsletter do not comply with EU 2017 sufficiently.

- The developer should engage directly with the public to elicit comment regarding the scoping study; meeting the public face-to-face, and their feedback included in the scoping process and addressed by the EIA.
- The checklist of relevant questions (Questions on Project Characteristics, EU 2017, pp 52-62) should be answered and the answers included in the scoping report.

Section 1.4 Coillte

- Section 1.1 names Coillte as the developer, but section 1.4 says that Coillte partners with Land Solutions to develop renewable energy projects on land managed by Coillte. So it is not clear whether Coillte or Land Solutions will be the developer and beneficial owner of the wind farm assets. This section could imply that there will be a sale of public state forest land, and we see this as an ambiguity that should be clarified.
- The Community Engagement process benefits “communities close to their wind farms”. We would welcome more specific details of the engagement process and how communities are defined, how proximity is determined, what benefits are provided, and how they would be distributed.

Section 1.6 Scoping Report Structure

- We believe that light pollution should be included in the section on Landscape and Visual Impact Assessment, with particular emphasis on the construction phase, insofar as the study area has very low radiance and sky brightness (see lightpollutionmap.info) and light from construction and operation of the wind farm is likely to have a disproportionate impact compared to more built-up areas.

Section 1.8 Site Location

- The description of the site does not mention that there are 3 wind turbines already in operation within the study area. Elsewhere in the document (figure 1.1 Study Area map), does not identify the location of these existing turbines. We feel this factual omission should be corrected, as the description of the site location is not accurate.
- The proposed location of some of the turbines appears to be on the border [Dough/Thur Mountains National Heritage Area](#). Our understanding is that as such it is protected. Dough Mountain is also a [Geological Heritage Area](#), though this is not mentioned in the scoping report and this omission should be corrected. Therefore these turbines will have an impact on the protected areas and we believe the 750m setbacks should apply to the placement of the turbines relative to these boundaries as well as to dwellings.
- This area is upland in Northwest Ireland, where rainfall, snowfall and winds may contribute to poorer ground conditions. There is a greater propensity for frost, ice, snow and flash flooding to compromise safety for humans and efficiency of wind turbine power generation at this site. Even though there is little reporting of land or bog slides or slippage in this area according to GSI geohazard map that is available so far, it is recognised that GSI have limited resources to identify and document historic and recent land and bog slide events. GSI depends on voluntary sharing of data from competent

authorities to generate point data on the relevant geohazard maps, but we believe that this is insufficient to militate against the risk of siting of wind farms in locations with unstable karst, steep slopes, flashy streams and bog (which has led to loss of life in Ireland in recent years).

Section 1.9.5 Grid Connection

- The distance from the study area to the Srananagh 22kV substation (34km, stated in the scoping study), will require additional infrastructure and engineering works (cabling, pylons, wiring, tree felling) and impacts on land use changes, impacts on views, impacts on biodiversity, etc., that are outside the study area. Since the project depends on connecting the wind farm to this substation, we believe that the EIAR scope should include the impacts from creating this connection. This scoping report's study area should incorporate the proposed or likely path that the connection will follow.

Section 1.9.7 Rehabilitation/Concurrent or Future Use of the Site

- We believe the word *intact* is not clearly defined in the sentence "Any areas of high biodiversity identified during the initial constraints study and the EIA site surveys will remain intact." Does it mean *undisturbed*, and will the baselining of the EIAR give managers the ability to prevent these areas from being disturbed or intervene effectively at an early stage if they are being disturbed?

Section 3.0 Reasonable Alternatives

- Our understanding is that turbines of this height were designed for offshore applications. We believe that an offshore wind farm with similar generating capacity should be included in this section of the EIAR.
- We believe that microgrids should be included in the alternative technologies considered, since in a rural area the energy generated by the proposed technology is unlikely to be used by the communities who will experience the most direct and sustained impact from its generation.

Section 5.3 Sensitive Receptors [Population and Human Health]

- We do not believe the 750m buffer zone is feasible in the study area. This 750 m buffer is not being upheld according to maps of proposed locations for turbines. If the study determines that some or all of the turbines cannot be sited with a 750m buffer, will that minimum distance be reduced in the final design?

Section 5.45 Desktop and Field Surveys

- The scoping report includes the Leitrim County Development Plan 2015-2021 as an information source for the Population and Human Health Assessment. Section 4.0 also references the 2015-2021 CPD. However, by the time this project is submitted to the relevant planning authority, the 2022-2028 CPD will have come into force. How will this scoping study and the subsequent EIAR align with this new CDP? What will the status of

this scoping study, the EIAR and the planning application be if they are based on policies that are no longer in force, or which are in conflict with the current policies of the local authority?

Section 6.1 Introduction [Biodiversity]

- Some of the guidelines that the EIAR will have “due regard” include ones that are no longer subject to EU/Irish Legislation (e.g., CIEEM is a UK organisation). We believe guidelines that have legitimacy under EU and Irish law should be used instead.

Section 6.3 Sensitive Receptors [Biodiversity]

- The study area is within the buffer zone of a recorded colony of the Marsh Fritillary Butterfly (*Euphydryas aurinia*), which is protected under Annex II of the European Union Habitats and Species Directive. We have also identified habitats on which the butterfly depends that lie within the study area. We believe that this species of butterfly, and its habitat, should be included in the list of sensitive receptors.
- We believe that the duration of the ecological field studies should not conclude before November of 2021, so that researchers have the best chance of locating colonies of the butterfly in October – the period in their lifecycle when they are easiest to locate.
- From National Biodiversity Data Centre records, the following protected species also need to be studied at this location:
 - Red Grouse - *Lagopus lagopus*
 - Hen Harrier – *Circus cyaneus*
 - Eurasian Curlew – *Numenius arquata*
 - Barn Swallow – *Hirundo rustica*
 - Merlin - *Falco columbarius*
 - Raven – *Corvus corax* – (there is a significant population in the area)
 - Sand Martin – *Riparia riparia*
 - Common Sandpiper – *Actitis hypoleucos*
 - Sky Lark - *Alauda arvensis*
 - Northern Wheatear - *Oenanthe oenanthe*
 - European Golden Plover - *Pluvialis apricaria*
 - Common Kestrel – *Falco tinnunculus*
 - Common Snipe - *Gallinago gallinago*
 - Common Pheasant - *Phasianus colchicus*
 - Common Wood Pigeon - *Columba palumbus*
 - Eurasian Woodcock - *Scolopax rusticola*
 - Common Grasshopper Warbler - *Locustella naevia*
 - Spotted Flycatcher - *Muscicapa striata*
 - Frog – *Rana temporaria*
 - Smooth Newt - *Lissotriton vulgaris*
 - Ash-black Slug - *Limax cinereoniger*
 - Fir Clubmoss - *Huperzia selago*
 - Sphagnum spp. – bog-forming mosses

- Bristle-leaf - *Brachydontium trichodes*
- Flag-moss - *Discelium nudum*
- Crowberry - *Empetrum nigrum*
- Red Squirrel – *Scurrius vulgaris*
- Additional relevant Threatened snail, liverwort and moss species
- Migratory Birds e.g. Greater White-fronted Goose (*Anser albifrons*) – also recorded in this area (NBDC data) for potential flightpath issues
- EU Habitats of importance for consideration:
 - 7130 Blanket Bog (Active)
 - 7140 Transition Mires
 - 7150 Rhynchosporon Depressions
 - 8310 Caves (karst features e.g. dolines too)
 - 8210 Calcareous Rocky Slopes
 - 8220 Siliceous Rocky Slopes
 - 7220 Petrifying Springs
 - 4010 Wet Heath
 - 4030 Dry Heath
 - 4060 Alpine and Subalpine Heath (350m+)
 - 6210 Orchid-Rich Calcareous Grassland
 - 6230 Species-rich Nardus Upland Grassland
 - 6410 Molinia Meadows
 - 6430 Hydrophilous Tall Herbs

Section 6.4 Desktop and Field Survey [Biodiversity]

- We believe that the project team should include records and data collected by local groups that have the best knowledge of the mountain and have the best chance of helping the project team identify the sensitive receptors.

Section 8.3 Sensitive Receptors [Hydrology]

- The description of the study area as having “a number of river catchments” is misleading. In fact, there are more than 40 recorded water sources flowing from the study area into Lough Gill and Lough Melvin. We believe that all of them should be identified in the EIA and their individual impacts assessed.

Section 11.3 Sensitive Receptors [Material Assets]

- There is a telecommunications mast on Dough Mountain that is critical for the provision of broadband to the surrounding areas, and therefore critical to economic activity and growth. We believe the impact on broadband services, both existing and future potential, should be explicitly study and impacts assessed.

Section 12.0 Noise and Vibration

- It is possible that the current noise impact from three turbines at Saddle Hill already breach 30dB levels. An additional 20 wind turbines could increase this noise impact to

much higher levels. We believe this should be taken into account when assessing cumulative impacts.

Section 13.3 Sensitive Receptors [Amenity, Heritage and Tourism locations]

- The area known as Fowley's Falls, an amenity in Rossinver is not considered in the list of tourism locations. We believe this area should be included in the study.
- A notable omission from the list of heritage sites is the homeplace of Sean Mac Diarmada near Kiltyclogher. This site is an important tourism destination in the area that could be impacted by this development. We consider it important that this site be included in the study.

Section 14.1 Introduction [Forestry]

- In the paragraph "Wildlife habitats and biodiversity ensure that biodiversity zones and important wildlife habitats retained for biodiversity are protected during harvesting. Assess harvest operations with due regard to the breeding and nesting seasons of important species, and associated features such as badger setts and heronries. Important species to consider include birds of prey, badger, bats, red deer, hare, hedgehog, otter, pine marten and red squirrel." We believe that curlew, hen harrier, and raven should be included in the scope of this assessment.

Section 15.3 Sensitive Receptors [Cultural Heritage]

- The north west has the highest concentration of Neolithic sites in the country and we believe it is highly likely that a thorough, well-informed field survey will reveal a significant number of archaeological features. The project team should use local expertise, [professional](#) and lay, to assist with the identification of these features in the study area.
- Construction phase is usually the most damaging to Cultural Heritage Sites. We believe that the entire pathway for import of materials and heavy plant to the site should be realistically assessed for cultural and natural heritage impacts.

Section 19.1 EIAR Consultees

- We believe that CABB (Cooperation Across Borders for Biodiversity) should be included, as they are a cross border environmental partnership with an interest in the biodiversity in the study area.
- We believe that the Manorhamilton Historical Society should be included, as they are a valuable source of local knowledge – not just historical, but also of the archaeology and biodiversity of the mountain.

From: [REDACTED]
Sent: Monday 6 January 2025 14:03
To: [REDACTED]
Subject: FW: Proposed Lissinagroagh Wind Farm Consultation
Attachments: [Proposed Lissinagroagh Wind Farm EIAR Scoping Report.pdf](#)

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Dear [REDACTED]

Thank you for your email

Please see attached comments from OPW Regional Engineer, for Tobin Consulting Engineers in relation to Lissinagroagh Wind Farm consultations.

Kind Regards,
[REDACTED]

From: [REDACTED]
Sent: Tuesday 3 December 2024 15:08
To: Info Opw <info@opw.ie>
Cc: [REDACTED]
Subject: Proposed Lissinagroagh Wind Farm Consultation

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To Whom It May Concern,

FuturEnergy Ireland DAC proposes to develop a wind farm north of Manorhamilton in County Leitrim approximately 3 km south of the Northern Ireland border in County

Fermanagh. The project will involve the development of a wind farm and all associated infrastructure including turbine foundations, hardstanding areas, borrow pits, access tracks, a 110kV electrical substation and an underground grid connection.

FuturEnergy Ireland DAC have commenced the process of Environmental Impact Assessment (EIA). The proposed wind farm site entrance, layout design and access points through which turbine components and construction deliveries may be made will be refined by the design team in consultation with the relevant planning authority and the local community. Detailed surveys and studies are currently being undertaken at the site and surrounding area and a project website has been established (<https://lissinagroaghwindfarm.ie/>). A team of technical experts are currently engaged in the process of scoping the environmental assessments for the project.

We invite you to submit any relevant information that you may hold and/or highlight any issues that you feel should be directed to the project team. Please see the enclosed EIA Scoping Document for further information (updated from the previously issued 2021 scoping report). Views/comments on the proposal can be submitted by email or letter to the undersigned as soon as convenient to ensure your views/comments are considered.

We request that submissions are provided before 5pm on Friday 24th January 2025.

Regards,

[Redacted signature]

Notice of Upcoming Leave from Friday 13th December – 3rd January

[Redacted text]

TOBIN
Galway | Dublin | Castlebar | Limerick | Sligo
Telephone: [Redacted]
Email: [Redacted]
Website: <http://www.tobin.ie>

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2020 Association of Consulting Engineers of Ireland Awards Winner: Project Management
2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)
2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year

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OPW Ref: **2-2025**

Your Ref: **Lissinagroagh Wind Farm, County Leitrim**

Lissinagroagh Wind Farm, County Leitrim

Dear Sir / Madam

I refer to your email dated 03/12/2024 in relation to the above project seeking comments or observations from this office.

We would make the following comments.

If any new culverts or bridges (or modifications to any existing culverts or bridges) are required to cross watercourses as part of the development or on proposed or existing access roads to serve or access the development, you should be aware that these require consent from the Commissioners of Public Works. This is a requirement of Section 50 of the Arterial Drainage Act of 1945 as amended.

Further information on the process including copies of the appropriate application form and brochure are available on our website at

<https://www.gov.ie/en/publication/957aa7-consent-requirements-constructionalteration-of-watercourse-infrastru/>

Please note that, in the context of seeking consent under Section 50, the current required design standard for bridges or culverts is based on the flood with an annual exceedance probability of 1% (often referred to as the 100 year flood), increased by 20% to cater for the effects of Climate Change. Bridges or culverts are required to be able to convey this design flood without significantly altering the hydraulic characteristics of the watercourse – further details on this issue are available in the brochure and can be clarified depending on the circumstances of any particular proposed bridge or culvert.

You should be aware that a grant of Planning Permission by a planning authority for a development which contains bridges or culverts does not confer section 50 consent on the applicant, nor does it absolve the applicant from the requirement to obtain such consent from the Commissioners.

With regard to any proposed Grid Connection Route which may cross several watercourses. If the cable and ducting are to be buried in the road, as they cross bridges over the water courses, and there is no interference with the opening in the bridge spanning the watercourse, then there is no issue. On the other hand, if it is proposed to pass the cable in its ducting through the opening of any bridge or culvert, this would be considered to be a modification of a bridge and it would require the consent of the Commissioners under Section 50 as mentioned above. Similarly, if it is proposed to carry the cable in its ducting across watercourses on new support structures spanning the watercourses, these should be treated as if they are bridges, and the consent of the commissioners under Section 50 should be obtained. If the cable and ducting is to be buried under the natural bed of the watercourses being crossed, Section 50 would not apply, and we would recommend that the duct be buried a sufficient distance below the natural bed to allow for erosion and mobility of the stream bed.

We would recommend that a flood risk assessment be carried out with regard to the proposed development and its construction. This should consider all sources, pathways and receptors of flood

risk. This should be carried out in accordance with the principles set out in the guideline document “The Planning System and Flood Risk Management” as published by the Minister for the Environment, Heritage and Local Government and the Office of Public Works. Please be aware that this is a separate issue from the requirement to obtain Section 50 consent as mentioned above.

In terms of the preparation of an EIA, the matters referred to above principally relate to the Hydrology Section, and the Risk of Flooding on a development such as this can impact on Landscape (e.g. landslides that have been reported in recent years), Infrastructure (roads and bridges) and people and their homes, among other things. The aim of the Section 50 process, and the Flood Risk Assessment which is recommended would be to mitigate any increased risk of flooding and the consequences of same, as arising from the proposed development.

Please use the reference number indicated above in any further correspondence with the office on this matter. Please issue our comments to [REDACTED] TOBIN Consulting Engineers at the following email address [REDACTED] in due course.

Yours sincerely,

[REDACTED]
West Region, Drainage Maintenance

[REDACTED]

From: [REDACTED]
Sent: Monday 10 May 2021 09:51
To: [REDACTED]
Subject: RE: Lissinagroagh Wind Farm - EIA Scoping

Follow Up Flag: Follow up
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Good morning

I have had a quick read through the report and can see the site location and have identified the max tip height for the turbines as 185 metres. However I have failed to find the height of the turbines above mean sea level in order to do a preliminary assessment. On first look it seems the development will need to be assessed by the designers of the new Instrument Flight Procedures in use at Sligo Airport but I will consult with our safety Manager in the first instance before making that judgement call.

[REDACTED]
Airport Manager

From: [REDACTED]
Sent: Friday, May 7, 2021 10:15 AM
To: [REDACTED]
Subject: Lissinagroagh Wind Farm - EIA Scoping

Dear Sir or Madam,

I am emailing you in relation to Coilltes proposed Lissinagroagh wind farm near Manorhamilton in County Leitrim.

This wind farm will comprise of up to 20 no. wind turbines and ancillary infrastructure including:

- An electrical substation with a control building and associated electrical equipment;
- Associated internal underground cabling and grid connection cabling;
- Borrow pits to source construction stone on-site for road upgrade and construction;
- A permanent anemometry mast up to a height of 100 metres to measure wind speed and direction;
- Upgrade of existing and provision of new site access roads and associated drainage;
- Biodiversity enhancement and conservation areas;
- A recreation amenity area; and
- Construction compounds.

The wind farm will be subject to an Environmental Impact Assessment (EIA) process which will be undertaken by the Consenting Planning Authority. Given the scale of the project, Coillte will engage with An Bord Pleanála under the Strategic Infrastructure Development (SID) consultation process to determine the planning consents route for the wind farm, i.e. either An Bord Pleanála or Leitrim County Council.

The planning application will be supported by an EIA Report which will be prepared on behalf of Coillte by TOBIN Consulting Engineers. It is in this context that we are providing your organisation with a copy of an EIA Scoping Report for the proposed wind farm. As a valued EIA stakeholder, Coillte would like to ensure that your comments on the proposed wind farm are considered a part of the EIA Report and planning application. The purpose of the Scoping Report is to provide a framework for the approach to be taken for the individual specialist's evaluations in the EIA Report, to identify environmental topics for which potential significant environmental impacts may arise, to provide a framework for the consultation process to take place with planning and environmental stakeholders as part of the environmental assessment work.

If you would like to provide comments on the proposed wind farm then Coillte would very much welcome same and will ensure that these comments are addressed as part of the EIA Report which will form part of the future planning application. In this context if your comments could be returned via email to [REDACTED] before the 18th June then this would be appreciated.

If you require any further details then please do not hesitate to contact the undersigned.

Kind regards,

[REDACTED]
TOBIN Consulting Engineers
Telephone: +353 (0)1 8030401
Email: [REDACTED]
Website: <http://www.tobin.ie>

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2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year
2018 Engineers Ireland Excellence Awards Winner: Heritage and Conservation
2017 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Innovation)
2017 KPMG Property Industry Excellence Awards Winner: Community Benefit Project of the Year

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From: [INFO](#)
Sent: Monday 23 December 2024 11:20
To: [REDACTED]
Subject: TII Ref: TII24-129702 - Proposed Lissinagroagh Wind Farm Consultation - north of Manorhamilton in County Leitrim

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Dear [REDACTED]

Thank you for your correspondence of 3 December 2024 regarding the above. Transport Infrastructure Ireland's (TII's) position in relation to your enquiry is as follows.

TII will endeavour to consider and respond to planning applications referred to it, given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines, as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals, following the examination of any valid planning application referred.

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national road network. In addition, Chapter 7 'Enhanced Regional Accessibility' of the National Development Plan, 2021 – 2030, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. This requirement is further reflected in the publication of the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

With respect to EIAR Scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network.

The developer should have regard, inter alia, to the following:

- Consultations should be had with the relevant Local Authority/National Roads Design Office, with regard to the locations of existing and future national road schemes in the area.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, including the potential haul route.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts.
- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).
- The EIAR should have regard to TII's Environmental Assessment and Construction Guidelines, including the Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (National Road Authority (NRA), 2014).
- The EIAR should consider the 'European Communities (Environmental Noise) Regulations, 2018, (S.I. no. 549 of 2018)', and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (NRA, 2014)').
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads.

In relation to national roads, TII's 'Traffic and Transport Assessment Guidelines' (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of TII's TTA Guidelines, which addresses requirements for sub-threshold TTA.

Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed, as TII will not be responsible for such costs.

- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are a feature of the development, e.g., turbine or substation components, separate structure approvals/permits and other licences may be required in connection with the proposed haul route. All national road structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed. Any requirements for 'Exceptional Abnormal Loads' should also be addressed in accordance with TII Publications.

In addition, the haul route should be assessed to confirm capacity to accommodate abnormal 'length' loads and any temporary works required are identified.

The national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contractors (MMaRC) and local road authorities, in association with TII.

The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses, to ascertain any operational requirements, including delivery timetabling, etc., to ensure that the strategic function of the national road network is safeguarded.

Where temporary works within any MMaRC Boundary are required to facilitate the transport of turbine components to site, the applicant/developer shall contact thirdpartyworks@tii.ie in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.

Additionally, any damage caused to the pavement on the existing national road arising from any temporary works due to the turning movement of abnormal loads (e.g., tearing of the surface course, etc.) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the road authority prior to the commencement of any development on site.

Any Road Safety Audit requirements should be addressed.

- Any grid connection and cable routing proposals should be developed to safeguard proposed road schemes, as TII will not be responsible for costs associated with future

relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

Where grid connection proposals impact the existing national road network, please note, in accordance with the National Planning Framework National Strategic Outcome No. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the network. This requirement is further reflected in the NDP, the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

There is around 99,000km of roads in Ireland. The national road network, which caters for strategic inter-urban travel, consists of only approx. 5.4% of this. There is a critical requirement to ensure the strategic capacity and safety of this national road network is maintained and significant Government investment already made in the national road network is safeguarded.

The provision of cabling along the national road network represents a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy.

Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24) outlines the objective of reaching 80% of electricity demand from renewable sources by 2030 through a range of measures, including:

"All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution". (Climate Action Plan 2024, p.163)

Consistent with CAP24, for all renewable energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives for grid connection takes place, including alternatives to public road, where appropriate. In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance, upgrades and safety works to existing national roads.

It is noted that Section 1.7 of the EIAR Scoping Report outlines potential grid connection to the Srananagh ESB substation in Co. Sligo, though no route is identified. Having regard to the foregoing, in TII's opinion, grid connection routing, where it is proposed to utilise the road network must therefore demonstrate that the route proposed represents the 'optimal solution'.

In addition, there is a finite road space available to accommodate all utilities in the road network. It is recommended that a co-ordinated approach to grid connection routing in this area is achieved to avoid risk to the effective delivery of renewable energy projects in the area.

Other consents or licences may be required from the road authority for any trenching or cabling proposals crossing the national road. TII requests referral of all proposals agreed and licensed between the road authority and the applicant, which affect the national road network.

Cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII. Any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network. All crossings in the vicinity of the national road should be by HDD and avoid all national road structures, including bridges, culverts, etc.

Notwithstanding any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.

I hope that this information is of assistance to you.

Yours sincerely,

[Redacted]

[Redacted]

From: [Redacted]
Sent: Tuesday 3 December 2024 14:21
To: Landuse Planning <LandUsePlanning@tii.ie>
Cc: [Redacted]
Subject: Proposed Lissinagroagh Wind Farm Consultation

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To Whom It May Concern,

FuturEnergy Ireland DAC proposes to develop a wind farm north of Manorhamilton in County Leitrim approximately 3 km south of the Northern Ireland border in County Fermanagh. The project will involve the development of a wind farm and all associated infrastructure including turbine foundations, hardstanding areas, borrow pits, access tracks, a 110kV electrical substation and an underground grid connection.

FuturEnergy Ireland DAC have commenced the process of Environmental Impact Assessment (EIA). The proposed wind farm site entrance, layout design and access points through which turbine components and construction deliveries may be made will be refined by the design team in consultation with the relevant planning authority and the local community. Detailed surveys and studies are currently being undertaken at the site and surrounding area and a project website has been established (<https://lissinagroaghwindfarm.ie/>). A team of technical experts are currently engaged in the process of scoping the environmental assessments for the project.

We invite you to submit any relevant information that you may hold and/or highlight any issues that you feel should be directed to the project team. Please see the enclosed EIA Scoping Document for further information (updated from the previously issued 2021 scoping report). Views/comments on the proposal can be submitted by email or letter to the undersigned as soon as convenient to ensure your views/comments are considered.

We request that submissions are provided before 5pm on Friday 24th January 2025.

Regards,

Notice of Upcoming Leave from Friday 13th December – 3rd January

TOBIN
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2022 Engineers Ireland Awards Winner: CPD Employer of the Year
2022 Association of Consulting Engineers of Ireland Awards Winner: Innovation
2020 Association of Consulting Engineers of Ireland Awards Winner: Project Management
2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)
2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year