
Appendix 2: Scoping Consultation Responses



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

11 February 2025

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Via email: brian.mcdonnell@tobin.ie

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

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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
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Newtown Road
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Is mise, le meas

Simon Dolan
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Market Square
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Iascach Intíre 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.



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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

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Brendan Maguire and Ailish Keane
Senior Fisheries Environmental Officers
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Co. Donegal



Iascach Iníre Éireann
Inland Fisheries Ireland





Mr Brian McDonnell,
Assistant Project Manager/Environmental Scientist,
TOBIN Consultant Engineers

27th January 2025

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

Dear Brian,

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.



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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



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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:



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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,

BERNARD GREENE MIPI
SENIOR PLANNER
PLANNING DEPARTMENT



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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.



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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.



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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,
John O'Hagan
Save Dough Mountain

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.