MKO Planning and Environmental Consultants

Response to Submissions

Cunlaghfadda Green Energy Project – Grid Connection, Co. Mayo

An Coimisiún Pleanála Case Reference 324429



DOCUMENT DETAILS

Client:	**Cunlaghfadda Green Energy Limited**
Project Title:	**Cunlaghfadda Green Energy Project – Grid Connection, Co. Mayo**
Project Number:	**220825-I**
Document Title:	**Response to Submissions**
Document File Name:	**220825-I Cunlaghfadda GC - Response to Submissions - 2026.11.13 F**
Prepared By:	**MKO** **Tuam Road** **Galway** **Ireland** **H91 VW84**

Planning and Environmental Consultants

Rev	Status	Date	Author(s)	Approved By
01	Draft	2026.11.09	JC, MM, NS ÓM, BT	FR, ÓM
02	Draft	2026.11.10	JC, MM, NS ÓM, BT	FR, ÓM
03	Draft	2026.11.12	JC, MM, NS ÓM, BT	FR, ÓM
04	Draft	2026.11.12	JC, MM, NS ÓM, BT	FR, ÓM
05	Final	2026.11.13	JC, MM, NS ÓM, BT	FR, ÓM

Table of Contents

1. **INTRODUCTION** **3**

1.1 Terminology 4
1.2 Site Location and Context 4
1.3 Overview of the Proposed Development 5
1.4 Planning Policy Context Update 5
1.4.1 Renewable Energy Strategy for County Mayo (Adopted 13 July 2026) 6

2. **RESPONSE TO PRESCRIBED BODY SUBMISSIONS AND OBSERVATIONS** **13**

2.1 Department of Housing, Local Government and Heritage 13
2.2 Geological Survey Ireland 13
2.3 Health Service Executive 13
2.3.1 Public Consultation 14
2.3.2 Water 14
2.3.3 Noise and Vibration 14
2.3.4 Air Quality 15
2.3.5 Food Safety and Environmental Compliance 15
2.3.6 CEMP 15
2.4 Transport Infrastructure Ireland 16
2.4.1 Official Policy 16
2.4.2 National Road Network Maintenance and Safety 16
2.4.3 Structures 17
2.4.4 Grid Connection Routing 17
2.4.5 Greenways 17
2.5 Uisce Éireann 17

3. **RESPONSE TO THIRD-PARTY SUBMISSIONS AND OBSERVATIONS** **19**

3.1 Planning Policy and Legislation 20
3.1.1 National Climate and Renewable Energy Policy 20
3.1.2 Local Planning Policy 22
3.1.3 Wind Energy Development Guidelines 23
3.1.4 Need for the Proposed Development and Planning History 24
3.2 Community Engagement and Consultation 27
3.3 Project Splitting and the EIA Directive 28
3.4 Cumulative Impact Assessment 29
3.4.1 Other Wind Energy Developments 30
3.5 Agricultural, Equine and Livestock Impacts 33
3.6 Consideration of Reasonable Alternatives 33
3.7 Population and Human Health 34
3.7.1 Shadow Flicker 34
3.7.2 Electro Magnetic Fields 34
3.7.3 Health and Safety, Fire Risk 35
3.7.4 Residential Amenity 36
3.7.5 Health 36
3.7.6 Lighting 37
3.7.7 Property Values 38
3.8 Biodiversity 38
3.8.1 Habitat Loss and Fragmentation 38
3.8.2 Molinia Meadows 38
3.8.3 Peatland habitats 39
3.8.4 Existing Wildlife 39
3.8.4.1 Badger 39
3.8.4.2 Marsh Fritillary Butterfly 40
3.8.4.3 Bats 40
3.8.4.4 Other species 42
3.8.5 Aquatic Ecology 43
3.8.6 Appropriate Assessment 44
3.8.7 Invasive Species 44

3.8.8 Limitations of Ecological Surveys 45
3.9 Birds 45
3.9.1 Curlew 45
3.9.2 Other Species 46
3.9.3 Bird Atlas Records 46
3.10 Land, Soils and Geology 47
3.10.1 Karst Features 47
3.10.2 Peat Stability 47
3.11 Water 48
3.11.1 Groundwater Contamination 48
3.11.2 Surface Water Quality 49
3.11.3 Flooding Risk 50
3.12 Climate 50
3.13 Noise and Vibration 51
3.13.1 Substation Noise 52
3.13.2 Noise Monitoring Locations 52
3.13.3 Human Health 52
3.13.4 Cumulative Noise Effects 52
3.14 Landscape and Visual 52
3.15 Archaeological, Architectural and Cultural Heritage 54
3.16 Traffic and Transport 55
3.17 Major Accidents and Natural Disasters 56
4. **CONCLUSION 59**

TABLE OF TABLES

Table 3-1 Third-Party Submissions and Observations Themes 19

TABLE OF FIGURES

Figure 1-1 Mayo RES 2026 Wind Strategy Map showing indicative Proposed Development Site location 12

TABLE OF APPENDICES

Appendix 1 – Renewable Energy Strategy for County Mayo (Adopted 13 July 2026) Policy Assessment Tables

1. INTRODUCTION

MKO has been instructed by Cunlaghfadda Green Energy Limited ('the Applicant') to prepare a response to the request issued by An Coimisiún Pleanála ('ACP' or 'the Commission') in a letter dated the 18th of September 2026 inviting the Applicant to respond to the submissions and observations received in respect of the live Strategic Infrastructure Development ('SID') planning application (ACP Case Reference 324429) which was submitted to the Commission on the 7th of July 2026 under the provisions of Section 182A of the Planning and Development Act 2000, as amended ('the Planning Act') ('the SID Planning Application'). The SID planning application for the Proposed Development was accompanied by an Environmental Impact Assessment Report ('EIAR'), Natura Impact Statement ('NIS'), Planning Report and all relevant SID planning application documents and drawings.

The Proposed Development for the Proposed Grid Connection comprises of a 110kV onsite electrical substation, loop-in grid connection, and associated infrastructure and works, located in Co. Mayo ('the Proposed Development').

Prior to the submission of the SID planning application to the Commission, a planning application for 7 no. wind turbines, and associated infrastructure and works ('the Proposed Wind Farm') was submitted to Mayo County Council ('MCC') on the 20th of May 2026, under the provisions of Section 34 of the Planning Act (MCC Pl. Ref. 2660398) ('the Proposed Wind Farm Planning Application'). On the 13th of July 2026, the planning application for the Proposed Wind Farm was refused by MCC subject to 3 no. refusal reasons. The Applicant subsequently lodged a First-Party Appeal against MCC's refusal of planning permission with the Commission which is due to be decided by the Commission on the 14th of December 2026 (ACP Case Ref. 501853). The Proposed Development will connect the Proposed Wind Farm to the national grid via the 110kV Castlebar to Cloon overhead line.

It should be noted that subsequent to the submission of the Proposed Development SID planning application to the Commission, a planning application for a battery energy storage system ('BESS') facility, and associated infrastructure and works ('the Proposed BESS') was submitted to MCC on the 14th of August 2026 under the provisions of Section 34 of the Planning Act (MCC Pl. Ref. 2660653) (the 'Proposed BESS Planning Application'). The Proposed Development will facilitate the connection of the Proposed BESS to the national grid via the 110kV Castlebar to Cloon overhead line. MCC subsequently issued a request for further information on 8th of October 2026. A response to MCC's further information request has not been submitted at time of writing.

The Applicant engaged in pre-application consultation with the Commission, then An Bord Pleanála, under the provisions of Section 182E of the Planning Act, as to whether the Proposed Development would meet the thresholds of the Seventh Schedule of the Planning Act. The Applicant opened consultations with the Commission in February 2024 in relation to the Proposed Development which comprises a 110kV onsite electrical substation, loop-in grid connection, and associated infrastructure and works, located in Co. Mayo. An SID meeting under the provisions of Section 182E of the Planning Act was held with the Commission on the 9th of May 2024. A letter received from the Commission dated the 4th of July 2024 stated that under Section 182E, it is the opinion of the Commission that the Proposed Development falls within the scope of Section 182A of the Planning Act. This confirmed that the Proposed Development constitutes SID and therefore the planning application was made directly to the Commission.

The Commission did not request responses to specific submissions or observations made to the SID planning application, rather they invited the Applicant to make a submission in response to the submissions and observations received. Correspondence from the Commission states that the deadline for submitting a response to the submissions and observations is the 13th of November 2026 (refer to the Cover Letter submitted with this Response to Submissions document).

It should be noted from the outset that the information contained within this Response to Submissions document is confined to the issues raised in the submissions and observations received by the Commission, and no new additional reports or supplementary reports are included.

This Response to Submissions document is structured as follows:

- Introduction
  - Terminology
  - Site Location and Context
  - Overview of the Proposed Development
  - Planning Policy Context Update
- Response to Prescribed Body Submissions and Observations
- Response to Third-Party Submissions and Observations
- Conclusion

1.1 Terminology

The terminology within this Response to Submissions documents is consistent with the terminology used throughout the original SID planning application documentation including the EIAR, NIS and Planning Report, and is outlined below.

- Where the **'Proposed Development'** or the **'Proposed Grid Connection'** is referred to, this refers to the proposed 110kV onsite substation, underground 110kV cabling and end masts connecting the proposed 110kV substation to the 110kV Castlebar to Cloon overhead line, access tracks and all ancillary works and apparatus. The Proposed Grid Connection is described in detail in Chapter 4 of the EIAR.
- Where the **'Proposed Wind Farm'** is referred to, this refers to the proposed turbines and associated foundations and hardstanding areas, including access tracks, underground cabling, meteorological mast, temporary construction compound, peat and spoil management, biodiversity enhancement, tree felling, site drainage, operational stage signage, turbine delivery route and junction accommodation works, and all ancillary works and apparatus. The Proposed Wind Farm is described in detail in Chapter 4 of the EIAR.
- The **'Proposed Turbines'** refers to the 7 no. proposed turbines associated with the Proposed Wind Farm as outlined above.
- Where the **'Proposed Project'** is referred to, this encompasses the entirety of the project (the Proposed Grid Connection and the Proposed Wind Farm as described above) for the purposes of the Environmental Impact Assessment (EIA) in accordance with the EIA Directive. The Proposed Project is described in detail in Chapter 4 of the EIAR.
- Where **'the Site'** is referred to, this relates to the primary study area for the EIAR, as delineated by the EIAR Site Boundary in green as shown on Figure 3-2 of the Planning Report and encompasses an area of approximately 165 ha.
- Where **'the Proposed Development Site'** is referred to, this relates to the area of the Proposed Development, delineated by the red line planning application boundary, as shown in Figure 3-3 of the Planning Report and encompasses area of 9.3 ha.

1.2 Site Location and Context

As set out in the documentation submitted with the SID planning application, the Proposed Development is located in the townland of Cloonbaul, Co. Mayo, approximately 5.3 kilometres ('km') to the northwest of the town Claremorris. The town of Castlebar is located approximately 16km north-west of the Site. The Site comprises a mix of agri-pastoral land, bog and private forestry. The N60 National Road runs north-south approximately 2km to the east. The R331 Regional Road runs northeast-southwest, approximately 5km from the southern boundary of the site. Existing access is via the L1505 and L1503 local roads to the south and the L5563 local road to the north. The site location context map is shown in Figure 3-1 of the Planning Report.

The Proposed Development will connect the Proposed Wind Farm and the Proposed BESS to the national electricity grid and comprises an onsite 'loop-in' 110kV substation which will connect to the

nearby Castlebar to Cloon 110kV overhead transmission line via approximately 982 meters (m) of underground cabling route from the proposed onsite 110kV substation through agricultural land to the existing overhead line. The existing overhead line will be broken by 2 no. end masts (lattice type towers) to facilitate the connection.

Current land-use on the Proposed Development Site comprises of agricultural pastures and coniferous forestry. Land-use in the wider landscape of the site comprises a mix of agriculture, peat cutting and low density residential.

1.3 Overview of the Proposed Development

The Proposed Development is described as follows in the statutory notices:

> *"In accordance with Section 182 of the Planning and Development Act 2000, as amended, Cunlaghfadda Green Energy Limited gives notice of its intention to make an application to An Coimisiún Pleanála for permission for the following proposed development in the townland of Cloonbaul, Co. Mayo.*
>
> *The Proposed Development will consist of the provision of the following:*
>
> *i. 1 no. 110kV electrical substation compound consisting of 2 no. single storey control buildings with welfare facilities, all associated electrical plant and apparatus, underground cabling, lighting columns, lighting masts, fencing and access gates, signage, 2 no. wastewater holding tanks and 2 no. rainwater harvesting tanks;*
>
> *ii. The installation of c. 982 meters of 110kV underground cabling, 2 no. new end masts with a height of c. 16 meters and associated hard standing areas to facilitate the new 'loop-in/loop-out' connection into the existing Castlebar to Cloon 110kV overhead line;*
>
> *iii. A telecommunications tower with a height of 36 meters and associated foundation, hard-standing area, fencing and access gate;*
>
> *iv. A temporary construction compound;*
>
> *v. Provision of a new permanent and temporary construction site access tracks;*
>
> *vi. Tree felling and vegetation removal;*
>
> *vii. Site drainage; and*
>
> *viii. All related site works above and below ground and all ancillary development.*
>
> *A ten-year planning permission is sought"*

1.4 Planning Policy Context Update

This following section provides an update to the planning policy context relevant to the Proposed Development since the SID planning application was submitted to the Commission on the 7th of July 2026.

1.4.1 Renewable Energy Strategy for County Mayo (Adopted 13 July 2026)

On the 13th of July 2026, MCC made Variation No. 2 to the Mayo County Development Plan 2022-2028 ('MCDP (as varied)') and adopted a new Renewable Energy Strategy for County Mayo (Adopted 13 July 2026) (Mayo RES 2026). The Mayo RES 2026 replaces the previous Renewable Energy Strategy for County Mayo 2011-2020 ('Previous Mayo RES') which previously formed part of Volume 4 of the MCDP (as varied). As such the Mayo RES 2026 is the relevant renewable energy strategy in force for MCC.

The Mayo RES 2026 sets out the guidance to support Mayo's transition to a low-carbon energy County and to become a national leader in renewable energy generation. The Mayo RES 2026 was developed in line with EU, national and regional climate targets, the MCDP (as varied) and the MCC Climate Action Plan 2024-2029 (Mayo LACAP). The compliance of the Proposed Development against the MCDP (as varied) and the Mayo LACAP is demonstrated in Section 7.2.1 and Section 7.2.4 of the Planning Report and in Chapter 2, Section 2.5.4 of the EIAR.

It is noted that the Office of the Planning Regulator (OPR) made a submission to the Proposed Variation No. 2 of the Draft Renewable Energy Strategy for County Mayo (April 2026) ('the Draft Mayo RES') which identified a number of substantive issues that required amendment to ensure material consistency with national policy and statutory requirements. Specifically, the OPR submission identified that the methodology and evidence-base underpinning the Draft Mayo RES require review and updating. Further to section 58(9) of the Planning Act, the OPR submission made 3 no. specific recommendations directing MCC to amend the Draft Mayo RES document and underling evidence-base. However, it appears that a number of recommendations have not been addressed in the published Mayo RES 2026.

Vision and Strategic Aims

The vision of the Mayo RES 2026 is as follows:

> *"To provide a strategy to maximise Mayo's renewable energy potential and become a national leader in renewable energy and make the transition to becoming a more energy secure, low carbon county in line with energy targets whilst balancing the need for new development with the protection of the environmental, cultural and heritage assets, tourism assets and the established and emerging economic sectors of the county."*

The strategic aims of the Mayo RES 2026 are as follows:

- *To provide an evidence-based strategy founded on understanding the local feasibility and potential for renewable and low carbon technology, predicated upon optimising the County's natural and socio economic, advantages and key assets (including tourism sector), core skills, and nearby research institutes.*
- *To facilitate a consistent approach to renewable energy and to maximise the opportunities for renewable energy development whilst safeguarding the environment and existing residential amenities.*
- *To set out policies and objectives for the main renewable sectors subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment requirements.*
- *To promote research and development, and to foster a supportive environment for innovation and demonstration of new and emerging renewable energy systems and technologies in County Mayo.*
- *To safeguard, where appropriate, areas with potential for renewable energy projects and to guide renewable energy development to preferred locations.*

Renewable Energy Policy Context

The Mayo RES 2026 highlights County Mayo's commitment to the achievement of national renewable energy targets and its support and promotion of renewable energy. The Mayo RES 2026 notes that:

> *"A key aspect of the Renewable Energy Strategy for county Mayo is in achieving the renewable energy target set out under Objective REO23 of the County Development Plan 2022-2028, which is – To support and facilitate the achievement of the minimum renewable energy target of 600 MW for County Mayo over the plan, and to review/revise this target to ensure consistency with any future renewable energy strategies for the Northern and Western Region."* (emphasis added)

It is important to note that the MCDP (as varied) recognises that the minimum 600MW renewable energy target over the period of the plan is a "*realistic deliverable*" and "*achievable*" target. Furthermore, the MCDP (as varied) recognised that the target "*may need to be revised over the lifetime of the Plan to ensure alignment with the Northern and Western Regional Assembly's forthcoming Renewable Energy Strategy*".

As discussed above, the Revised NPF has introduced Regional Renewable Energy Capacity Allocations which was a key action for Climate Action Plan 2024 and is supported by Climate Action Plan 25. The Northern and Western Region has been allocated a target of installing an **additional 1,389 MW of onshore wind energy, by 2030**. Under National Policy Objective 74 (NPO) of the National Planning Framework First Revision ('Revised NPF'), the Regional Assemblies, including the Northern and Western Regional Assembly ('NWRA') must plan for the delivery of the regional renewable electricity capacity allocations as set out in the Revised NPF and identify allocations for each Local Authority within the regions, including MCC.

Additionally, NPO 75 of the Revised NPF requires Local Authorities to plan for the delivery of Local Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy ('RSES'), through their City and County Development Plans. At the time of writing of this Response to Submissions Document, Local Target Power Capacity allocations have not been established, however from the regional allocation, it is clear that the MCC, as part of the Northern and Western Region will be required to deliver a significant amount of additional onshore wind energy in the coming years. Furthermore, existing operational wind farms in the County will reach the end of their operational lifetime in the coming years and this existing capacity will need to be replaced either by granting planning permission for new wind energy developments or for the extension or re-powering of existing wind farms.

This is recognised in the Mayo RES 2026 which states that "*many of the current operational wind farm developments are likely to be coming towards the end of the production life in the coming years*". The Wind Energy Ireland (WEI) Repowering Ireland report (June 2024) identified that across Ireland a total of 76 no. operational wind farms with an installed capacity of 854 MW will reach the end of their operational lifetime and will be decommissioned by 2030, unless re-powered or extended. By 2040, this figure will rise cumulatively to 201 wind farms with an installed capacity of 2,488 MW[1]. The report identified that a large proportion of operational wind farms will not be able to retain their existing installed capacity if repowered due to design, planning and environmental constraints and that only 65% of operational wind farms are located in favourably designated areas for wind energy development.

Likewise, the Mayo RES 2026 recognises that "*repowering is not a simple answer as many circumstances and factors have changed since projects were originally built e.g., wind designations have changed or are in location that are no longer considered suitable for wind energy*".

Renewable energy developments such as the Proposed Project will generate and provide renewable wind energy to the national electricity grid, supporting County Mayo in becoming a leader in renewable energy generation which is a strategic aim of the County as set out in the MCDP (as varied). It is important to

[1] *Repowering Ireland (Wind Energy Ireland, June 2024). Available at: https://windenergyireland.com/images/files/final-repowering-ireland-report-june-2024.pdf*

note that Local Target Power Capacity allocations as set out in the Revised NPF have not yet been established, and MCC will need to support the NWRA with achieving its regional renewable electricity capacity allocations. Furthermore, with many wind farms coming towards the end of their permitted operational life in County Mayo, new renewable energy developments that align with the principles of proper planning and sustainable development, such as the Proposed Project, will be required to offset the generating capacity lost due to the decommissioning or reduced repowering output of these operational wind farms. The Proposed Development will support the achievement of Ireland's legally binding national target of a 51% reduction in greenhouse gas emissions by 2030 and net-zero emissions by 2050 as set out in the Climate Action and Low Carbon Development Act 2015, as amended ('the Climate Act'). Additionally, on a European level the Proposed Development will also contribute to the achievement of the Renewable Energy Directive III target of a 42.5% renewable energy share.

Constraints and Considerations

The Mayo RES 2026 identifies areas within County Mayo suitable for wind energy development within the Wind Strategy Map (Map 6.14 of the Mayo RES 2026). There are three categories of wind energy designations within the Mayo RES 2026 as shown on the Wind Strategy Map, including Open for Consideration; Repowering Potential; and Unsuitable.

The Wind Strategy Map has been prepared following a constraints mapping exercise undertaken in accordance with the Draft Revised Wind Energy Development Guidelines as published by the then Department of Housing, Planning and Local Government (DHPLG) in 2019 ('the Draft Guidelines') and the Methodology for Local Authority Renewable Energy Strategies (Sustainable Energy Authority of Ireland, 2013) as documented in Section 6.1 of the Mayo RES 2026 as follows:

- **Step 1** involved identifying areas of wind potential having regard to wind speeds and the national grid.
- **Step 2** involved a sieve mapping analysis of key ecological, environmental, archaeological and landscape designated areas and other technical considerations (such as resource constraints or accessibility constraints).
- **Step 3** involved overlaying mapping of constructed and permitted wind farms to take account of cumulative effects.
- **Step 4** involved further analysis of the identified areas not subject to constraints, including the sensitivity of the landscapes in these areas to wind energy development.
- **Step 5** involved assessing the potentially suitable areas for further consideration in terms of the relationship with the wind energy designations of adjoining Countries. This stage evaluated the consistency of renewable energy mapping and critical infrastructure between adjoining counties and those of Mayo.

The results of the constraints mapping exercise are presented in the Wind Strategy Map (Map 6.14). The Mayo RES 2026 identifies that generally, the "*emerging preferred location for renewable wind is to the east and south east of the county, where there is a high degree of compatibility with the wind designations of neighbouring counties*" (p.49). The Mayo RES 2026 defines areas Open for Consideration and Unsuitable for wind energy developments as follows:

- **Open for Consideration:** "*Applications for utility scale wind farms in these areas will be assessed on a case-by-case basis, subject to viable wind speeds, environmental resources and constraints and cumulative impacts in compliance with Article 6 of the Habitats and EIA Directives.*"
- **Unsuitable:** "*Areas located outside of 'Areas Open to Consideration' with the exception of the established clustered wind farm areas are not deemed suitable for commercial wind farm development because of their overall sensitivity arising from landscape, ecological, recreational and or cultural and built heritage resources.*" (emphasis added)

The Proposed Project is located within the southern part of the County which is identified in the Mayo RES 2026 as generally being one of the preferred locations for renewable wind energy development. As

shown in Figure 1-1 below, the southern part of the County, including the Site, is mainly identified as 'Open for Consideration', with small pockets of interspersing lands identified as 'Unsuitable' arising from specific landscape, ecological, recreational and/or cultural and built heritage constraints.

As noted above in Section 1, the Proposed Development will connect the Proposed Wind Farm to the national grid via the 110kV Castlebar to Cloon overhead line. The location of the Proposed Wind farm in an area identified as 'Open for Consideration' was also acknowledged in the MCC Planner's Report prepared in respect of the planning application for the Proposed Wind Farm (MCC Pl. Ref. 2660398)which stated:

> *"the 7 proposed turbines in this instance are all located in an area designated Areas Open to Consideration for wind energy developments in the draft Renewable energy Strategy. Applications for utility scale wind farms in these areas will be assessed on a case-by-case basis, subject to viable wind speeds, environmental resources and constraints and cumulative impacts in compliance with Article 6 of the Habitats and EIA Directives."*

It is noted that the Wind Strategy Map (Map 6.14) contained within the Draft Renewable Energy Strategy for County Mayo (April 2026), that was referenced in the MCC Planner's Report, appears unchanged in the adopted Mayo RES 2026. Accordingly, it is considered that the 7 no. Proposed Turbines of the Proposed Wind Farm remain located within an area 'Open for Consideration' within the Mayo RES 2026.

While the Proposed Development itself is not a wind energy development, it will facilitate the transfer of renewable wind energy from the Proposed Wind Farm to the national electricity grid and will also stabilise the grid by transmitting the renewable energy produced by the Proposed Wind Farm at an appropriate voltage. Accordingly, the renewable energy policy context that is applicable to the Proposed Wind Farm is relevant to the consideration of the Proposed Development, within the context of the wider Proposed Project.

As detailed in Chapter 3 of the EIAR, MKO undertook a desk study of constraints to identify the site for the Proposed Development with the lowest potential for impact which were further ground truth through environmental and ecological site visits. Chapter 3 of the EIAR demonstrates how the design and layout of the Proposed Development incorporate appropriate setbacks from designated ecological constraints. The Proposed Development Site is not located within any Nationally Designated or Internationally Designated Natura 2000 site. Additionally, the Proposed Development has been designed to avoid and/or mitigate any potential effects on Annex I Habitats and no Proposed Project infrastructure is sited within these areas as detailed in Chapter 6 of the EIAR.

Chapter 6 of the EIAR concludes that the Proposed Development will not result in any significant effects on any of the identified Key Ecological Receptors ('KER'). No significant effects on receptors of International, National, County Importance or Local Importance (Higher Value) were identified. The Proposed Development will be constructed and operated in accordance with the design, best practice and mitigation that is described within this application, and as such there will be no significant individual or cumulative effects on biodiversity, flora or fauna at the international, national, county, or local scales or on any of the identified KERs.

Overall, it has been demonstrated throughout the EIAR and the Planning Report that the Proposed Development Site is suitable for the Proposed Development. Table A, Table B and Table C of Appendix 1 of this Response to Submissions Document demonstrate the compliance of the Proposed Development against the policies and objectives of the Mayo RES 2026, the environmental mitigation measures, and the constraints identified within the Mayo RES 2026, respectively.

Grid Connection

The Mayo RES 2026 recognises that supporting infrastructure is a significant consideration for renewable energy developments, particularly the national electricity grid.

As detailed in Chapter 3 of the EIAR, further to advice from Grid Technical Experts, it was deemed that the most viable option to connect the Proposed Wind Farm to the national grid would be through a loop in connection into the existing Cloon-Castlebar 110kV overhead line which runs directly adjacent to the Proposed Wind Farm. The Proposed Development will connect the Proposed Wind Farm to the 110kV Castlebar to Cloon overhead line via a 110kV onsite substation.

The Proposed Development will facilitate the transfer of renewable wind energy to the national electricity grid and will also stabilise the grid by transmitting the renewable energy produced by the Proposed Wind Farm at an appropriate voltage. The proposed onsite 110kV substation will form part of the national electricity grid once constructed and energised and will enhance the capacity of grid infrastructure in the County.

The Mayo RES 2026 highlights that the "*The Castlebar – Cloon 110 kV circuit is one of the few transmission circuits in County Mayo and provides an important pathway for power supply into the area but also for transferring renewable generation out from the area to where it is needed. This uprate is planned to support the need for increased power-transfer capacity arising due to new RES generation*". Within EirGrid's Transmission Development Plan 2024, published in September 2024, the Castlebar – Cloon 110kV overhead line uprate (CP0848) is included among EirGrid's projects to reinforce the transmission network within and out of County Mayo. EirGrid states that these projects will address its sustainability policy driver by "*facilitating increased renewable generation via increased transfer capacity*".

Alternative design options for the Proposed Development were considered in Chapter 3 of the EIAR. The chosen Proposed Development design was considered to be the most environmentally prudent and practical option.

Summary

The Proposed Development supports the strategic aims of the Mayo RES 2026 which seeks to '*maximise the opportunities for renewable energy development whilst safeguarding the environment and existing residential amenities*.' Overall, it has been demonstrated throughout the EIAR and the Planning Report that the Proposed Development Site is suitable for the Proposed Development for the reasons detailed in **Section 5.2** of the Planning Report and **Sections 3.2.4** and **Section 3.2.5** of **Chapter 3** of the EIAR.

The Proposed Development which forms part of a wind energy development is located within the southern part of the County which is identified in the Mayo RES 2026 as generally being one of the preferred locations for renewable wind energy development. The design of the Proposed Development layout has had consideration to the constraints identified within the Mayo RES 2026. Table A, Table B and Table C of Appendix 1 of this Response to Submissions Document demonstrate the compliance of the Proposed Development against the relevant policies and objectives of the Mayo RES 2026 and all the constraints identified within the Mayo RES 2026.

The layout of the Proposed Project has been informed by a detailed constraints mapping exercise undertaken in accordance with the Wind Energy Development Guidelines published by the then Department of Environment, Heritage and Local Government (DoEHLG) in June 2006 ('the Guidelines'), the draft Revised Wind Energy Development Guidelines published by the then Department of Housing, Planning and Local Government (DoHPLG) in December 2019 ('the Draft Guidelines') and the Best Practice Guidelines for the Irish Wind Energy Industry and has been informed by multi-season site surveys and assessments. The layout of the Proposed Project generally achieves appropriate setbacks from all designated landscape, ecological, recreational, cultural, built heritage and existing infrastructure constraints and sensitive receptors as required by the Guidelines and the Draft Guidelines respectively.

The findings of the EIAR demonstrates that the Proposed Development will be capable of being constructed, operated and decommissioned without likely significant effects on the environment generally on the basis that the Proposed Development will be constructed and operated in accordance with the design, best practice and mitigation measures described within the SID planning application.

Furthermore, the NIS has objectively concluded that, following an examination, analysis and evaluation of the best available scientific knowledge and objective scientific information, including in particular the nature of predicted impacts, that the Proposed Development, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site in light of its conservation objectives and best scientific information, and there is no reasonable scientific doubt in relation to this conclusion.

Overall, it is submitted that the Proposed Development is in line with the proper planning and sustainable development of the area and will help contribute to the achievement of European, national, regional and local climate and renewable energy targets. Specifically, the Proposed Development will help support Ireland in achieving its legally binding emissions targets, and Climate Action Plan 2025 ('CAP25') 9GW onshore wind energy and 80% renewable energy capacity targets.

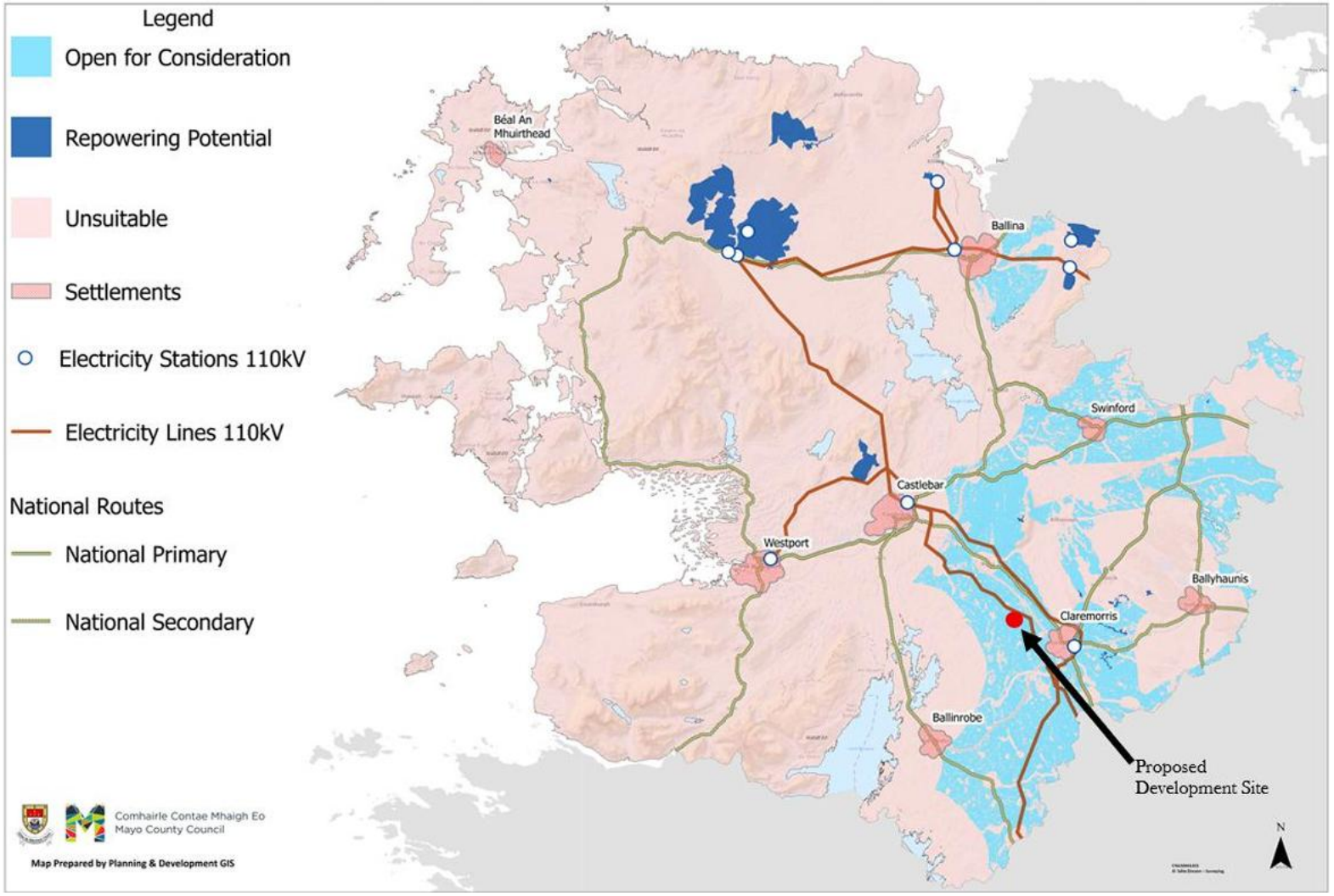


Figure 1-1 Mayo RES 2026 Wind Strategy Map showing indicative Proposed Development Site location

2. RESPONSE TO PRESCRIBED BODY SUBMISSIONS AND OBSERVATIONS

The following section provides responses to each of the Prescribed Bodies submissions and observations made on the Proposed Grid Connection. A total of 5 no. Prescribed Bodies made a submission or observation on the SID planning application as follows:

- Department of Housing, Local Government and Heritage (DHLGH)
- Geological Survey Ireland (GSI)
- HSE National Environmental Health Service (NEHS)
- Transport Infrastructure Ireland (TII)
- Uisce Éireann

2.1 Department of Housing, Local Government and Heritage

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

Response

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

2.2 Geological Survey Ireland

Geological Survey Ireland (GSI) did not raise any concerns in relation to the Proposed Grid Connection in their submission. GSI acknowledged the use of its hydrogeological and geological datasets in preparation of the EIAR.

No issues in relation to lands, soil or hydrogeology were identified.

2.3 Health Service Executive

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

- Public Consultation
- Water
- Noise and Vibration
- Air Quality
- Food Safety and Environmental Compliance
- Construction Environmental Management Plan (CEMP)

2.3.1 Public Consultation

The NEHS recommend that the existing Community Liaison Officer (CLO) arrangements be maintained throughout the construction phase of the development, with advance notice being given to the local community in advance of works taking place and a clear complaints procedure being implemented.

Response

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

2.3.2 Water

With regards to Water, the NEHS has acknowledged Chapter 9 of the EIAR, the Flood Risk Assessment, Surface Water Management Plan and the Construction and Environmental Plan (CEMP) provided as part of the EIAR. The NEHS notes that the water assessment is acceptable from an environmental health perspective.

The NEHS recommends that, should consent be granted for the Proposed Project and before the commencement of works any private wells or drinking water supplies adjacent to the Site are confirmed by a site walkover. The NEHS recommends that the Applicant confirms a designated person who will be responsible for monitoring drainage and water protection measures during the duration of the works. The NEHS recommends that following periods of heavy rainfall, surface water controls are checked and works are stopped should there be any risk of dirty water leaving the Site. any pollution incidents should be responded to and reported. Finally, the NEHS recommends that the final CEMP demonstrated how wastewater holding tanks at the site are monitored and maintained during the lifetime of the Proposed Project.

Response

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

2.3.3 Noise and Vibration

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

The NEHS acknowledges that, subject to the implementation of appropriate mitigation measures and operational controls, significant adverse effects arising from noise, vibration, or construction activities are not anticipated.

Response

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

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

2.3.4 Air Quality

The NEHS note that submitted documentation as part of the EIAR include dust control measures. Furthermore, the NEHS recommends that prior to works commencing, it is confirmed who will be responsible on site for undertaking dust checks and frequency of dust and road cleanliness checks. It is recommended that dust controls are increased if dust or mud are visible on roads or if complaints occur. The NEHS notes that particular attention is considered for rural roads or unpaved roads during the construction phase. The NEHS recommends that dust complaints are recorded and investigation, and appropriate records of dust inspections are kept. The NEHS recommends that the final CEMP show how these measures will be implemented and checked during the construction phase.

Response

The Applicant acknowledges the recommendations set out by the NEHS with respect to Air Quality and confirms its commitments to implementing the mitigation measures in the accompanying CEMP, in the event that the Proposed Project is granted planning permission.

2.3.5 Food Safety and Environmental Compliance

The NEHS note that the Proposed Development contains temporary welfare facilities during the construction phase of the project for construction workers. The NEHS recommends that prior to the commencement of works, the Applicant confirmed whether food preparation, storage or service will take place on site and food business registration is completed should it be required. The NEHS recommends drinking water is sourced from a compliant supply, and any wastewater or waste from the welfare facilities is disposed of appropriately. Furthermore, the NEHS recommends that any smoking shelters provided comply with tobacco control legislation.

Response

The Applicant acknowledges the recommendations set out by the NEHS with respect to Food Safety and Environmental Compliance in the event that the Proposed Project is granted planning permission.

2.3.6 CEMP

The NEHS acknowledges that the CEMP is acceptable and contains the relevant controls for drainage, traffic, dust, noise, invasive species, waste management, emergency response, environmental monitoring and site responsibilities.

The NEHS recommends that should planning permission be granted, the final CEMP is drafted and agreed. The final CEMP should contain all final mitigation and monitoring requirements relevant to environmental health. The final CEMP should also identify the person responsible for implementation and checking of each measure. Any planning conditions should be reflected in the CEMP.

Response

The Applicant acknowledges the recommendations set out by the NEHS and confirms its commitments to implementing the mitigation measures in the final CEMP, in the event that the Proposed Project is granted planning permission.

2.4 Transport Infrastructure Ireland

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

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

2.4.1 Official Policy

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

Response

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

2.4.2 National Road Network Maintenance and Safety

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

Proposed Turbine Component and Substation Component Delivery Route

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

Response

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

2.4.3 Structures

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

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

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

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

Response

It should be noted that Chapter 15 of the submitted EIAR states that, although the construction phase of the Proposed Project will involve the transportation of abnormal loads, the associated axle loadings will remain within accepted statutory and engineering limits. To ensure that any potential impacts on the road network are appropriately managed, a programme of pre-delivery route condition surveys and structural assessments is proposed. These measures form part of the Traffic Management Measures outlined in Section 15.1.12.5.2 of the EIAR.

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

2.4.4 Grid Connection Routing

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

2.4.5 Greenways

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

Response

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

2.5 Uisce Éireann

Uisce Éireann (UÉ) had the following recommendations on the Proposed Grid Connection:

- Where the applicant seeks a connection to the public network, the applicant shall enter into a connection agreement with Uisce Éireann prior to the commencement of the development and adhere to the standards and conditions set out in that agreement.
- There shall be no build over of public infrastructure from these proposals. Separation distances as per Uisce Éireann's Standards Codes & Practices shall be achieved where public infrastructure is in situ within and/or adjacent to site boundaries.
- The development shall not impact public drinking water sources and/or abstraction point(s) and/or abstraction infrastructure.
- The design and construction of the Water & Wastewater pipes and related infrastructure to be installed in this Development shall comply with the Uisce Éireann Connections and Developer Services Standard Details and Codes of Practice.

Response

The Applicant acknowledges the recommendations set out by UÉ and will liaise with UÉ should permission be granted for the Proposed Grid Connection in relation to the points outlined above to ensure the Proposed Grid Connection complies with Uisce Éireann's Standards Codes & Practices.

3. RESPONSE TO THIRD-PARTY SUBMISSIONS AND OBSERVATIONS

There were 72 no. valid third-party submissions and observations recived on the SID planning application. Table 3-1 below outlines the common themes iodentified within the third-party submissions and observations, and sepcifies the lead author on the Project team responsible for the corresponding response.

Table 3-1 Third-Party Submissions and Observations Themes

Theme	Lead Author	Section
Planning Policy and Legislation	MKO Planning	Section 3.1
Community Engagement and Consultation	MKO Planning	Section 3.2
Project Splitting and EIA Directive	MKO Planning	Section 3.3
Cumulative Impact Assessment	MKO Planning	Section 3.4
Agricultural, Equine and Livestock Impacts	MKO Environment	Section 3.5
Consideration of Reasonable Alternatives	MKO Environment	Section 3.6
Population and Human Health	MKO Environment	Section 3.7
Biodiversity	MKO Environment MKO Ecology	Section 3.8
Birds	MKO Environment	Section 3.9
Land, Soils and Geology	MKO Environment	Section 3.10
Water	MKO Environment	Section 3.11
Climate	MKO Environment	Section 3.12
Noise and Vibration	MKO Environment	Section 3.13
Landscape and Visual	MKO Environment	Section 3.14
Archaeological, Architectural and Cultural Heritage	MKO Environment	Section 3.15
Traffic and Transport	MKO Environment	Section 3.16
Major Accidents and Natural Disasters	MKO Environment	Section 3.17

3.1 Planning Policy and Legislation

3.1.1 National Climate and Renewable Energy Policy

A number of submissions raised concerns regarding the national climate and renewable energy policy context for the Proposed Project. Submissions contend that the objectives do not override the requirement for site-specific planning and environmental assessment.

Response

The national climate and renewable energy policy context for the Proposed Development was discussed throughout the SID planning application documentation, such as the Chapter 2 of the EIAR and the Planning Report due to the nature of the Proposed Development, which constitutes electricity transmission infrastructure, and forms part of a renewable energy development.

As a nation, Ireland is legally bound to its climate targets. The Climate Action and Low Carbon Development Act 2015, as amended ('the Climate Act') legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade. Section 15(1) of the Climate Act requires public bodies (including the planning authorities) to carry out its functions consistently, insofar as practicable, with specified climate plans and objectives, including the latest, which includes CAP25.

To reiterate, Section 15(1) below places an obligation on public bodies to exercise their functions in favour of climate concerns when making decisions, unless it is objectively impracticable to do so.

> *"A relevant body shall, in so far as practicable, perform its functions in a manner consistent with:*
>
> *a) the most recent approved climate action plan, a) the most recent approved national long term climate action strategy,*
> *b) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
> *c) the furtherance of the national climate objective, and*
> *d) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State."*

The implications for public bodies in exercising their functions in accordance with Section 15 of the Climate Act has been interpreted by the Supreme Court in its judgment of 4th February 2026 (Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5). The Supreme Court confirmed that consenting authorities must make decisions in a manner 'consistent with' the approved national long term climate action strategy, 'in so far as is practicable'. The Supreme Court held that when considering whether a decision to grant planning permission would be consistent with the climate policies and objectives listed in Section 15, a planning authority is entitled to presume that compliance with the development plan, which itself has been prepared in accordance with section 15, will be compliant with those climate policies and objectives. As demonstrated in the Planning Report, the Proposed Development complies with the development plan and the objectives therein.

Ireland is also legally bound by renewable energy targets at a European level. The latest revision of the Renewable Energy Directive ('RED III') introduced a binding EU-wide target for overall Renewable Energy Share (RES) of at least 42.5% by 2030 and requires Member States to set their national contributions to the EU-wide target. In accordance with RED III and the revised RES target, the Department of the Environment, Climate and Communications have published an updated National Energy and Climate Plan 2021-2030 in July 2024. The updated NECP committed to achieving a 43% share of renewable energy in total energy consumption by 2030. The updated NECP states that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation

(Regulation 2018/1999). As such, every viable renewable energy development including transmission infrastructure plays a crucial role in meeting Ireland's climate targets. The approval of well-planned, appropriately located renewable energy developments and transmission infrastructure, such as the Proposed Development is not just beneficial, it is imperative. Without decisive action to facilitate renewable energy deployment, Ireland risks missing national and EU commitments, incurring financial penalties, and undermining energy security.

Locally, the MCDP (as varied) is supportive of the Proposed Development as it sets out the need for Mayo to transition to a low carbon and climate resilient County with a focus on renewable energy to reduce the County's greenhouse gas emissions and increase the County's environmental sustainability. Specifically, a strategic aim of the MCDP (as varied) is to transition Mayo into a low carbon and climate resilient County, reduce greenhouse gas emissions and become a national leader in renewable energy generation. The Proposed Development will help support Mayo with this strategic aim. Compliance with all relevant policies within the MCDP (as varied) is demonstrated in Table 7-2 and Table 7-3 of the Planning Report.

The principle of development at this location is supported by the relevant renewable energy strategy currently in force for MCC, the Mayo RES 2026. The Proposed Development which forms part of a renewable wind energy development is located within the southern part of the County which is identified in the Mayo RES 2026 as generally being one of the preferred locations for renewable wind energy development. As shown in Figure 1-1 above, the southern part of the County, including the Proposed Development site, is mainly identified as 'Open for Consideration', with small pockets of interspersing lands identified as 'Unsuitable' arising from specific landscape, ecological, recreational and/or cultural and built heritage constraints. The design of the Proposed Development layout has had consideration to the constraints identified within the Draft Mayo RES, the majority of which was adopted in the Mayo RES 2026. Table 7-6 and Table 7-7 of the Planning Report demonstrate the compliance of the Proposed Development against the relevant policies and objectives of the Draft Mayo RES and all the constraints identified within the Draft Mayo RES, respectively. Table A, Table B and Table C of Appendix 1 of this Response to Submissions Document demonstrate the compliance of the Proposed Development against the policies and objectives of the Mayo RES 2026, the environmental mitigation measures, and constraints identified within the Mayo RES 2026, respectively.

The purpose of the EIAR submitted with the SID planning application is to document the current state of the environment on and in the vicinity of the Site and to determine the likely significant effects of the Proposed Development on the environment and where mitigation measures may be required. The findings of the EIAR and the mitigation measures set out within the documents demonstrates the Proposed Development will be capable of being constructed, operated and decommissioned without likely significant effects on the environment generally.

The NIS submitted with the SID planning application provided an assessment of all potential direct or indirect adverse effects on European Sites, taking into account all relevant guidance including the European Commission's Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC (EC, 2021).

Where the potential for any adverse effect on any European Site has been identified, the pathway by which any such effect may occur has been robustly blocked through the use of avoidance, appropriate design and mitigation measures as set out within this report and its appendices. The measures ensure that the construction, operation and decommissioning of the Proposed Project will not have an adverse effect on the integrity of any European sites in light of their conservation objectives.

Following an examination, evaluation and analysis, in light of best scientific knowledge and the conservation objectives of the site, and, on the basis of objective information, having taken into account the relevant mitigation measures, it can be concluded beyond reasonable scientific doubt that the Proposed Project will not adversely affect the integrity of any European Sites, either alone or in combination with other plans or projects.

The EIAR, NIS and the Planning Report submitted with the SID planning application demonstrate that it is not anticipated that the Proposed Development will result in any likely significant effects on the environment and that the Proposed Development is in line with the proper planning and sustainable development of the area in which the Proposed Development site is located.

3.1.2 Local Planning Policy

A number of submissions reference the local planning policy relevant to the Proposed Project and raise concerns in relation to the compliance of the Proposed Project with the MCDP (as varied), the Previous Mayo RES and the Draft Mayo RES, and the Mayo RES 2026 which is the relevant renewable energy strategy currently in force for MCC. A number of submissions refer to the zoning of the Proposed Wind Farm and the Proposed Grid Connection within the wind energy designations of the Previous Mayo RES, the Draft Mayo RES and the Mayo RES 2026.

Response

Firstly, it should be noted that the SID planning application for the Proposed Development was submitted to ACP on the 7th of July 2026, prior to the adoption of the Mayo RES 2026 on the 13th of July 2026. The compliance of the Proposed Development against the Draft Mayo RES is demonstrated in Section 7.2.3, Table 7-6, Table 7-7 of the Planning Report and Section 2.5.4 of Chapter 2 of the EIAR. The compliance of the Proposed Development against the relevant renewable energy strategy currently in force for MCC, the Mayo RES has been assessed in this Response to Submissions Document for completeness, please refer Section 1.4.1 and Appendix 1 of this Response to Submissions Document which demonstrates the compliance of the Proposed Development against the Mayo RES 2026.

It should also be noted that this Response to Submissions Document has been prepared in relation to the SID planning application for the Proposed Development, which was submitted to the Commission. The Proposed Development is the subject of this Response to Submissions Document. The Proposed Wind Farm is the subject of a separate planning application, which was submitted to MCC, and is currently with the Commission under a First-Party Appeal.

In relation to the MCDP (as varied), the compliance of the Proposed Development against this is demonstrated in Section 7.2.1, Table 7-2 and Table 7-3 of the Planning Report and Section 2.5.4 of Chapter 2 of the EIAR. The MCDP (as varied) includes policies in relation to climate action and reducing greenhouse gas emissions which aligns the County with wider European, national and regional objectives. The MCDP (as varied) also includes policies regarding renewable energy and electricity grid infrastructure. Table 7-2 of the Planning Report sets out the policies and objectives within the MCDP (as varied) relevant to the Proposed Development. A statement of compliance is included with regard to each relevant policy outlined. It is demonstrated through Table 7-2 of the Planning Report that the Proposed Development is in compliance with the relevant policies and objectives of the MCDP (as varied). Section 8.8 Renewable Energy and Section 8.9 of Volume 2 of the MCDP (as varied) sets out the Development Management Standards that MCC may consider when considering applications for renewable energy developments and specifically grid connections such as the Proposed Development. The Proposed Development is assessed against each of the requirements as set out in Table 7-3 of the Planning Report. It is demonstrated through Table 7-3 of the Planning Report that the Proposed Development is in compliance with the relevant Development Management Standards of the MCDP (as varied).

Regarding the Previous Mayo RES, the 7 no. proposed turbines of the Proposed Wind Farm are all located entirely within an area designated in the Previous Mayo RES as '*Tier 1-Preferred (Cluster of Turbines)*' for wind energy development. It is important to note that the Proposed Development forms part of the Proposed Project which is a wind energy development. The Proposed Development will facilitate the connection of the Proposed Wind Farm to the national electricity grid. Table 7-4 and Table 7-5 of the Planning Report respectively demonstrate that the Proposed Development is in accordance

with the policies and objectives of the Previous Mayo RES and the mitigation measures as set out within the Previous Mayo RES.

The Proposed Development supports the strategic aims of the Draft Mayo RES which seeks to '*maximise the opportunities for renewable energy development whilst safeguarding the environment and existing residential amenities*'. The Proposed Development which forms part of a wind energy development is located within the southern part of the County which is identified in the Draft Mayo RES as generally being one of the preferred locations for renewable wind energy development. The design of the Proposed Development layout has had consideration to the constraints identified within the Draft Mayo RES. Table 7-6 and Table 7-7 of the Planning Report demonstrate the compliance of the Proposed Development against the relevant policies and objectives of the Draft Mayo RES and all the constraints identified within the Draft Mayo RES, respectively.

In summary, the MCDP (as varied) and the renewable energy strategies for MCC fully recognises the importance of tackling climate change through the increased supply of renewable energy. MCC seeks to support and facilitate the sustainable provision of a reliable energy supply in the County, with emphasis on increasing energy supplies derived from renewable resources. Furthermore, there is a range of policies in place which support the development of renewable energy. Accordingly, the Proposed Development is considered to be compliant with the relevant provisions of the MCDP (as varied) and the renewable energy strategies for MCC and represents proper planning and sustainable development in the functional area of MCC.

3.1.3 Wind Energy Development Guidelines

A couple of submissions highlight concerns with the Guidelines. The submissions consider the Guidelines to be outdated and not fit for purpose when assessing modern wind energy developments, particularly having regard to the scale and dimensions of modern wind turbines. Concerns were also raised in relation to wind turbine setback distances, noise, and shadow flicker.

Response

As set out in Section 2.5.5 of Chapter 2 of the EIAR, the then Department of Environment, Heritage and Local Government ('DoEHLG') published the Guidelines under Section 28 of the Planning Act, which has since been repealed. However, the Guidelines are still force under Section 27(1) of the Planning and Development Act 2024, as amended ('the New Planning Act') and are considered National Planning Policy Guidance under Section 27(2) of the New Planning Act. The aim of the Guidelines was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines also highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development. Each wind energy development has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. The Guidelines should be applied practically and do not replace existing national energy, environmental and planning policy. While the Guidelines remain the relevant guidelines in place, at the time of lodgement, decision makers (Local Authorities and the Commission) are not bound to their provisions, and they can (and do) consider updated standards/requirements/specifications in assessing impacts and the proper planning and sustainable development of the area.

The then Department of Housing, Planning and Local Government ('DoHPLG') published the Draft Guidelines in December 2019. A consultation process in relation to the Draft Guidelines concluded on the 19th of February 2020. A further review of the Draft Guidelines is currently underway by the Department of Housing, Local Government and Heritage ('DoHLGH') and the Department of the Environment, Climate and Communications ('DECC'), particularly in relation to noise limits. Since the publication of the Draft Guidelines, there have been significant changes in national policy regarding

renewable energy targets, giving further impetus to the importance of the further review. The Draft Guidelines set out that that the proper planning and sustainable development of areas and regions must be considered when local authorities prepare their development plans and assess planning applications, irrespective of the significant role renewable energy has to play in tackling climate change. The Draft Guidelines note that potential impacts of wind energy development proposals on the landscape, including the natural and built environment, must be considered along with the legitimate concerns of local communities.

The design of the Proposed Project has been developed in accordance with the provisions of Draft Guidelines (for example in relation to 4 times the turbine tip height set back distance from third- party sensitive receptors) and the inclusion of a standalone Community Engagement Report.

The Government made the commitment in the 'Programme for Government 2025 – Securing Ireland's Future' to prioritise the publication of new Wind Energy Development Guidelines, having regard to international best practice and standards. At time of writing, the Draft Guidelines remain unadopted. The relevant wind energy guidelines for the purposes of Section 27(1) and Section 27(2) of the New Planning Act, remain those published in 2006, the Guidelines. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the Draft Guidelines may be finalised during the consideration periods for the current planning application for the Proposed Project. To this end, on the basis of the details available from the Draft Guidelines, it is anticipated that the Proposed Project will be capable of adhering to the relevant noise and shadow flicker standards, please refer to Chapter 5 and Chapter 12 of the EIAR for further details. While the final guidelines have not yet been published, it should be noted that shadow flicker is entirely controllable and is discussed further in Chapter 5. In addition, the Proposed Project maintains a 4 times maximum tip height set back between the proposed turbines and sensitive receptors which is currently the recognised standard for visual amenity purposes, as outlined in the Draft Guidelines. Furthermore, community consultation has also been undertaken, please refer to the standalone Community Engagement Report in Appendix 2-2 of the EIAR.

3.1.4 Need for the Proposed Development and Planning History

A number of submissions raise concerns regarding the need and justification for the Proposed Development, having regard to MCC's refusal of permission for the Proposed Wind Farm planning application and the subsequent First-Party Appeal made to the Commission. Submissions contend that the Proposed Development has no standalone purpose or demonstrated need in the absence of a permitted wind farm. Concerns were also raised that if the Commission grants permission for the SID planning application prior to a decision being made on the First-Party Appeal on the Proposed Wind Farm planning application, it would be premature and pre-commit the site to a future energy development.

Response

Planning Application Processes

The SID planning application for the Proposed Development was submitted to the Commission on the 7th of July 2026 under the provisions of Section 182A of the Planning Act (ACP Case Ref. 324429). Prior to this, the Applicant engaged with the Commission, then An Bord Pleanála under the provisions of Section 182E of the Planning Act, as to whether the Proposed Development would meet the thresholds of the Seventh Schedule of the Planning Act. The Applicant opened consultations with the Commission in February 2024 in relation to the Proposed Development which comprises an onsite 110kV substation which will break into the existing Castlebar to Cloon 110kV overhead line that traverses the site via a loop in loop out connection. An SID meeting under the provisions of Section 182E of the Planning Act was held with the Commission on the 9th of May 2024, where the Proposed Development, the Proposed

Wind Farm and the planning application processes for both were discussed. A letter received from the Commission dated the 4th of July 2024 stated that under Section 182E, it is the opinion of the Commission that the Proposed Development falls within the scope of the Section 182A of the Planning Act. This confirmed that the Proposed Development constitutes SID and therefore the planning application should be made directly to the Commission.

A separate planning application for the Proposed Wind Farm was submitted to MCC on the 20th of May 2026, under the provisions of Section 34 of the Planning Act (MCC Pl. Ref. 2660398). On the 13th of July 2026, the planning application for the Proposed Wind Farm was refused by MCC subject to 3 no. refusal reasons. The Applicant subsequently lodged a First-Party Appeal against MCC's refusal of planning permission with the Commission on the 10th of August 2026, the Appeal is due to be decided by the Commission on the 14th of December 2026 (ACP Case Ref. 501853). During the two pre-application consultation meetings held with MCC on the 16th of January 2024 and 2nd of March 2026, prior to the submission of the planning application, the Proposed Wind Farm, the Proposed Development and the planning application processes for both were discussed.

To comply with the provisions of the Planning Act controlling development, it is common for components making up a renewable energy development to be consented under multiple planning applications made under different provisions of the Planning Act. It is well established in planning practice that separate planning applications may be submitted for multiple components of a renewable energy development as the case is here.

Planning History

The planning history of the Proposed Development Site is acknowledged, in particular the planning application for the Proposed Wind Farm, which was refused permission by MCC on the 13th of July, subject to 3 no. refusal reasons. The Applicant subsequently lodged a First-Party Appeal against MCC's refusal of the Proposed Wind Farm's planning application on the 10th of August 2026. It is well established in planning practice, however, that each planning application must be assessed on its own merits, having regard to the specific detail of the proposal at hand, the specific planning policy context as well as all relevant environmental considerations available at the time of decision.

While the Proposed Development will connect the Proposed Wind Farm to the national electricity grid via the 110kV Castlebar to Cloon overhead line, the operation of the Proposed Development is not dependent on the Proposed Wind Farm. This is exemplified by the planning application for the Proposed Wind Farm applying for the decommissioning of the wind turbines, meteorological mast, and all underground cabling within the site connecting the turbines to a proposed 110kV substation following a thirty five-year operational life from the date of full commissioning of the wind turbines. However, the SID planning application for the Proposed Development does not apply for the decommissioning of the 110kV onsite electrical substation, loop-in grid connection, and associated infrastructure in line with the decommissioning of the relevant Proposed Wind Farm elements. The Proposed Development will form part of the national electricity grid and can continue to do so even after the Proposed Wind Farm is decommissioned.

As detailed in Chapter 3 of the EIAR, further to advice from grid technical experts, it was deemed that the most viable option to connect the Proposed Wind Farm to the national grid would be through a loop-in connection into the existing Cloon-Castlebar 110kV overhead line which runs directly adjacent to the Proposed Wind Farm Site. The Proposed Development will connect the Proposed Wind Farm to the 110kV Castlebar to Cloon overhead line via a new 110kV onsite substation.

This will provide a new connection node in an area where existing transmission infrastructure is constrained. The nearest existing 110kV substation, Dalton, on the eastern side of Claremorris, is heavily utilised and of an older electrical layout that offers limited scope for extension. The Dalton site is bounded by the N60 to the north, the N17 to the west and the Westport/Ballina to Dublin railway line to the south, which makes additional underground cable connections into it difficult. By contrast, the Proposed Development is located on the western side of Claremorris and will be built to a current standard layout.

This layout readily accommodates future bay extensions and facilitates day-to-day outage management. The Proposed Development will therefore offer a more practical connection point for future generation, storage and demand in the region. It will also remain capable of serving as a connection point for other generation and demand, subject to EirGrid's connection processes.

The Proposed Development is the subject of the SID planning application for approval to the Commission. The Proposed Development will facilitate the transfer of renewable wind energy to the national electricity grid and will also stabilise the grid by transmitting the renewable energy produced by the Proposed Wind Farm at an appropriate voltage. Furthermore, the proposed on-site 110kV substation will form part of the national electricity grid once constructed and energised and will enhance the capacity of grid infrastructure in the County.

Ultimately, it is considered that the Proposed Development is in accordance with the provisions of proper planning and sustainable development, and that the SID planning application includes the necessary documentation that the Commission needs to assess the Proposed Development on its own merits.

Need for the Proposed Development

As discussed above, the operation of the Proposed Development is not dependent on the Proposed Wind Farm. However, the Proposed Development will connect the Proposed Wind Farm if permitted to the national electricity grid, which will enable the transfer of renewable energy to the national electricity grid, which is essential to meet European, national, regional and local climate and renewable energy targets.

The provision of transmission infrastructure such as the Proposed Development is strongly supported by European, national, regional and local policies and guidelines aimed at achieving the transition to a low carbon and climate resilient economy by supporting the increase of renewable energy generation and integration into the national electricity grid and enhancing energy security. Specifically, the Proposed Development will help contribute to achieving the target of generating 9GW of electricity from onshore wind and 80% renewable energy share by 2030 as set out in CAP25. The comprehensive suite of European, national, regional and local policy support for wind energy, demonstrates that the principle of the Proposed Development is acceptable.

National climate and renewable energy objectives, and the decarbonisation of Irish society as a whole is dependent on the rapid expansion of renewable energy in Ireland, along with the transfer and integration of renewable energy onto the national electricity grid. The scale of the challenge Ireland faces in decarbonising its economy is enormous, but the climate change implications of not doing so are even greater. The Proposed Development, together with the Proposed Wind Farm, will help support the decarbonisation of the electricity sector and the decarbonisation of other sectors, reducing reliance on imported fossil fuels for energy generation and enhancing Ireland's energy security.

Furthermore, the proposed on-site 110kV substation will form part of the national electricity grid once constructed and energised and will enhance the capacity of grid infrastructure in the County, and potentially supporting the integration of other renewable energy generators onto the national electricity grid.

Planning Permission

In relation to the submissions which raise concerns with prematurity and precommitment of the site for future wind energy development if the Commission grants permission to the Proposed SID planning application prior to a decision being made on the First-Party Appeal on the Proposed Wind Farm planning application, it is important to reiterate that the Proposed Development is subject to a separate planning application from the Proposed Wind Farm, due to it being deemed SID by the Commission in a letter dated the 4th of July 2024, which states that the Proposed Development falls within the scope of the Section 182A of the Planning Act.

As such and as stated above, the Proposed Wind Farm planning application First-Party Appeal will be assessed on its own merits, having regard to the specific detail of the proposal at hand, the specific planning policy context as well as all relevant environmental considerations available at the time of decision.

In relation to precommitment of the site, for renewable energy developments that do have multiple elements under separate planning applications, a condition can be prescribed from the relevant planning authority stating that a grant of planning permission for the relevant element of a renewable energy development shall not be construed as any form of consent for any other element of the same renewable energy development in the interest of clarity.

As such the Commission is able to assess the Proposed Development SID planning application on its own merits and were it to grant planning permission a condition similar to the one described above can be prescribed within the conditions of planning permission. Hence, the refusal of the Proposed Wind Farm planning application and the subsequent First-Party Appeal to the Commission, will not result in a premature grant of planning permission or precommitment of the site if the Proposed Development SID planning application were to be decided on prior to the Proposed Wind Farm First-Party appeal.

Regarding the matter of prematurity, the issue of prematurity is dealt with in the Fourth Schedule of the Planning Act and Section 7.16.1 of the Development Management Guidelines for Planning Authorities published by the then DoEHLG in June, 2007 ('the Development Management Guidelines').

The Fourth Schedule of the Planning Act and Section 7.16.1 of the Development Management Guidelines make reference to prematurity of a proposed development due to existing deficiencies in the provision of water supply, sewerage facilities and/or existing deficiencies in the road network serving the area of a proposed development. Prematurity is also referenced in relation to a pending determination by the planning authority or road authority of a road layout in the area where the proposed development is located. Additionally, a proposed development would be "*premature by reference to the order of priority, if any, for development indicated in the development plan or pending the adoption of a local area plan in accordance with the development plan*" as per the Fourth Schedule of the Planning Act.

As per the provisions of the Fourth Schedule of the Planning Act and Section 7.16.1 of the Development Management Guidelines, it is not considered that the Proposed Development would be premature if the SID planning application were to be granted, prior to the First-Party Appeal for the Proposed Wind Farm being decided on. None of the submissions provide legal justification to support a case of prematurity in accordance with the definition of the term as prescribed within the planning legislation and guidance as discussed above.

Additionally, as discussed above, given the provisions of the Planning Act governing development, it is common for renewable energy developments to have separate planning applications made under different provisions of the Planning Act for individual elements of renewable energy developments. As such, it is well established in planning practice that multiple planning applications may be submitted for renewable energy development elements. Planning applications made under different provisions of the Planning Act will naturally have different statutory timelines in relation to submissions and decision-making periods which are beyond the control of the Applicant.

3.2 Community Engagement and Consultation

Within the submissions, concerns have been raised suggesting there was a lack of community consultation undertaken as part of the Proposed Project, with submissions claiming that there was a lack of meaningful engagement with the local community and insufficient information and communication provided. Concerns were also raised regarding the extent and timing of consultation, the consultation radius, opportunities to attend consultation events and requests for further engagement with the Applicant.

Response

As detailed in the Planning Report and Chapter 2 of the EIAR, a Community Engagement Report was included as Appendix 2-2 of the EIAR, which outlines the steps that the Applicant has taken throughout the progression of the Proposed Project to ensure transparent community engagement through all phases of the Proposed Project to date. This Report has been prepared in line with the requirements as set out in the Draft Guidelines in relation to Community Engagement.

As detailed in Section 4.3 of the Planning Report, a project Community Liaison Officer (CLO) was appointed, and an introductory information pack was posted in March 2026 to all householders within a c. 2km radius of the Proposed Project. The information provided to the local community was also made available for public viewing on the dedicated project website. The information pack included a company brochure providing an overview of the Applicant, the Proposed Project and general information regarding wind energy; a site location map; and dedicated contact details for the CLO, including a telephone number and email address, together with details of the dedicated project website.

Following the initial notification of the proposal to the local community, the CLO liaised with interested parties in helping them to understand the proposal and respond to any queries or concerns raised. Door-to-door visits to all households within a c. 1km radius of the Proposed Project were held on the 10th of March 2026. Further consultations were organised, with the CLO attending in-person meetings with individuals to answer queries relating to the Proposed Project. A letter was posted to all households within a c. 1km radius of the Proposed Project, inviting them to a community clinic, which was held on the 8th of April 2026 in McWilliam Park Hotel, Claremorris, County Mayo.

The consultation process provided the Applicant and Project Team with an enhanced understanding of the key issues and concerns raised by the local community. Consultation remains ongoing, and it is the intention of the Applicant to continue engagement with the local community throughout the lifespan of the Proposed Project.

The development of the Proposed Project will provide an enduring economic benefit to the communities surrounding the Proposed Project, through the community benefit package for residents and community groups, employment during the construction and operation of the Proposed Project and through the annual rates payable to the Local Authority.

3.3 Project Splitting and the EIA Directive

Some submissions raised concerns regarding the compliance of the Proposed Project with EU Directives, in particular the EIA Directive, EU habitats and Bird Directive. Concerns primarily relate to the issue of project splitting whereby a larger development is artificially divided into smaller parts to downplay the overall environmental and social impacts.

The submissions claim that applying for planning permission separately for the Proposed Grid Connection and the Proposed Wind Farm constitutes 'project splitting' and prevents a full assessment of the entire project. In a similar vein, some submissions also raised concerns that the Proposed BESS was subject to a separate planning application and was not assessed in the EIAR for the Proposed Project either as part of the Project or as part of the cumulative impact assessment which has resulted in project splitting and an incomplete assessment of the overall project.

Response

It is acknowledged that 3 no. separate planning applications were made in relation to the Proposed Wind Farm, the Proposed Grid Connection and the Proposed BESS as detailed in Section 1 of this Response to Submissions document. The chronology of planning applications is detailed in Section 1 of this Response to Submissions document.

The Proposed Project has been progressed to the planning stage through its own individual planning and design processes. Project splitting arises where a larger development is artificially divided into smaller parts in order to avoid or reduce the scope of environmental assessment. That is not the case here. The Proposed Project has been assessed in full as a complete project, with all associated infrastructure and likely significant effects considered as part of the EIAR and NIS, where applicable. The Proposed BESS represents a subsequent, standalone proposal and was not conceived at the time of submission of the earlier applications for the Proposed Development (the Proposed Grid Connection) and the Proposed Wind Farm.

A key consideration for EIARs is the extent of the 'project' relevant to the determination made in *O'Grianna & Ors v An Bord Pleanála [2014] IEHC 632*. In this case, the High Court concluded that 'integral' project elements must form part of the 'project' definition for the purposes of carrying out EIA. The Proposed BESS is not considered to be integral to the Proposed Wind Farm or the Proposed Grid Connection as neither element needs the Proposed BESS to function or to be operational.

The Proposed Wind Farm and the Proposed Grid Connection were assessed together in the EIAR submitted with their respective planning applications, while the subsequent EIAR submitted with the Proposed BESS planning application assesses the cumulative and in-combination impacts of all three elements as a complete whole.

Following O'Grianna, it has been held in several subsequent cases that a developer is not obliged to apply for planning permission for both a windfarm and its grid connection within the same application (notably *Alen-Buckley and Ors v An Bord Pleanála and Ors [2017] IEHC 541*, and *North Kerry Wind Turbine Awareness Group v An Bord Pleanála [2017] IEHC 126, North Westmeath Turbine Action Group & Anor v An Bord Pleanála & Ors [2025] IEHC 367*). The O'Grianna judgment provides only that an environmental impact assessment of one of the components without the other does not comply with the Directive. This point is concisely laid out in para. 498 in the Judgement on *North Westmeath Turbine Action Group & Anor v An Bord Pleanála & Ors [2025] IEHC 367* as below:

> *"498. In O'Grianna and subsequent cases (notably Alen-Buckley and Ors v An Bord Pleanála and Ors [2017] IEHC 541, and North Kerry Wind Turbine Awareness Group v An Bord Pleanála [2017] IEHC 126.), it has been held that the O'Grianna rule does not mean that a developer must apply for planning permission for both the windfarm and a grid connection within the same application. It means only that an environmental impact assessment of one of the components without the other does not comply with the Directive."*

While the Proposed BESS does not form part of the Proposed Project as described in the EIAR submitted with the SID planning application for the Proposed Grid Connection or the planning application for the Proposed Wind Farm, the EIAR submitted with the Proposed BESS does assess the Proposed Project as comprising the Proposed Development, the Proposed Wind Farm and the Proposed BESS and provides a full cumulative assessment of all three developments together.

Furthermore, the EIAR submitted with the planning applications for the Proposed Wind Farm and Proposed Grid Connection recognises that separate developments may exist within the same geographic area. In such circumstances, the appropriate mechanism for considering potential interactions between projects is through the cumulative impact assessment. Accordingly, the EIAR submitted with the planning applications for the Proposed Wind Farm and Proposed Grid Connection includes a cumulative impact assessment, described in Section 2.9 of the EIAR, which considers cumulative effects with other existing, permitted, and proposed developments in the surrounding area. This approach is consistent with statutory requirements, relevant guidance, and established planning practice. Further details on the cumulative impact assessment methodology and findings presented in the EIAR which accompanied the SID planning application are provided in Section 3.4 below.

3.4 Cumulative Impact Assessment

3.4.1 Other Wind Energy Developments

A number of submissions raise concerns regarding the impact of the Proposed Project cumulatively with other wind energy developments in the surrounding area. The issues identified where it is suggested that cumulative impacts may arise are residential amenity; biodiversity; land, soils and geology; water; noise; landscape and visual; cultural heritage; and traffic and transport.

Response

The cumulative impact assessment methodology is set out in Section 2.10 of Chapter 2 of the EIAR. The aim of the cumulative impact assessment is to identify what influence the Proposed Project will have on the surrounding environment when considered collectively with proposed and existing projects, projects pending a decision from the planning authority, projects in the public domain such as Strategic Infrastructure Development (SID) at pre-consultation with ACP, and land-uses in the vicinity of the Site location. To establish a long list of existing, permitted and proposed projects to be included in the cumulative impact assessment, cumulative study areas were established for each individual topic area in the EIAR. Following consultation with the EIAR team on each individual topic, the maximum geographical extent of each cumulative study area and justification for this extent was established and is presented in Table 2-8 of Chapter 2 of the EIAR. Each cumulative study area was established with regard for the potential environmental receptors, potential impact pathways, topic specific guidance, best practice and professional judgement. Once the cumulative study areas were identified and justified, a search was conducted across various platforms and databases in order to compile a list of projects and ongoing activities in the area. The sources used to establish the cumulative long list are provided in Table 2-9 below. The data was first compiled spatially through a Geographic Information System (GIS). The spatialised data was then exported into a list for further scrutiny and review. This formed the cumulative long list provided in Appendix 2-3 of the EIAR.

The cumulative impact assessments carried out in each of the subsequent chapters of the EIAR consider all potential significant cumulative effects arising from relevant projects and land uses within the cumulative study area. Existing land uses within the cumulative study area include ongoing agricultural and forestry practices. Overall, the Proposed Project has been designed to avoid and mitigate impacts on the environment, and a suite of mitigation measures is set out within the EIAR. The mitigation measures set out in this EIAR will ensure that significant cumulative effects do not arise during the construction, operational or decommissioning phases of the Proposed Project. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.

Residential Amenity

Chapter 5 of the EIAR considers the potential cumulative effects of the Proposed Project and other relevant developments has been carried out with the purpose of identifying what influence the Proposed Project will have on the surrounding environment when considered cumulatively.

Chapter 5 of the EIAR concludes that the Proposed Project will have a short-term, slight negative residual effect on residential amenity during construction works. During the operational phase, noise and shadow flicker from the proposed and permitted projects will be limited to below Guideline levels, resulting in a long-term, not significant residual impact on residential amenity.

Biodiversity

Section 6.6 of Chapter 6 of the EIAR considers the Proposed Project in combination with other existing, consented and proposed plans and projects in the area that could result in cumulative impacts on the Key Ecological Receptors ('KER') identified in the Chapter.

Chapter 6 of the EIAR concludes that following the detailed surveys undertaken and impact assessment provided, it is concluded that there will be no significant residual effects on biodiversity as a result of the Proposed Project. The other permitted, proposed, and/or existing wind farms in the area were considered (among other projects) but the Proposed Project has been deliberately designed to minimise the effects on biodiversity by avoiding Annex I habitat and areas of high value for fauna. The Proposed Project will not result in any significant residual effects on biodiversity and will not contribute to any cumulative effect when considered in combination with other plans and projects. In the review of the projects and plans that was undertaken, no connection that could potentially result in additional or cumulative impacts was identified. Neither was any potential for different (new) impacts resulting from the combination of the various projects and plans in association with the Proposed Project.

Land, Soils and Geology

Chapter 8 of the EIAR considers the potential cumulative effects of the Proposed Project and other existing, proposed or permitted projects outside the Site.

Chapter 8 of the EIAR concludes that due to the localised nature of the proposed construction works which will be kept within the Site, there is no potential for significant cumulative effects in-combination with other local developments on the land, soils and geology environment as all effects are direct within the Site. Other existing, proposed or permitted projects outside the Site do not have the potential to reduce or increase the magnitude of effects of the Proposed Project on Land, Soils and Geology. The only potential cumulative effects are associated with those activities which are currently ongoing at the Site including turbary peat cutting and private forestry. However, the cumulative effects of the Proposed Project in combination with the turbary activities and the forestry operations on the land, soils and geological environment are not considered to be significant given the small footprint of the Proposed Project and following the implementation of the mitigation measures prescribed in this chapter. The only way the Proposed Project can have cumulative effects with other off-site projects and plans is via the drainage and off-site surface water network, and this hydrological pathway is assessed in Chapter 9 of the EIAR. The construction of the Proposed Development works will only require relatively localised excavation works within the Site and therefore will not contribute to any significant cumulative effects.

Water

Chapter 9 of the EIAR presents an assessment of the potential cumulative effects associated with the Proposed Project and other developments (existing and/or proposed), plans and land uses on the hydrological and hydrogeological environment.

Chapter 9 of the EIAR concludes that in relation to cumulative effects with other relevant wind farm developments considered in the Chapter, that the greatest potential for effects would be if the construction phases of these developments were to overlap. However, these wind farms are already operational and the respective EIARs for these wind farms detailed mitigation measures for the protection of downstream water quality during operation and decommissioning. Furthermore, combined with the implementation of the detailed, tried and tested, mitigation measures prescribed in the EIAR , there will be no potential for cumulative effects with other wind farm developments.

Noise

Chapter 12 of the EIAR considers the potential cumulative impacts of the Proposed Project in combination with other wind energy developments in the area as required by best practice guidance discussed in the Chapter. As outlined in in the Chapter, there is no other wind farm development, existing or proposed within 7km of the Proposed Project. It is therefore considered that a significant effect is not associated with the Proposed Project in combination with other wind farm developments. The likely effect due to the cumulative wind turbine noise is Not Significant, Long Term.

Landscape and Visual

Chapter 13 of the EIAR considers cumulative landscape effects and cumulative visual effects. Chapter 13 concludes that cumulative visual effects have greatest potential to arise with other existing developments. However, given the setting of the Proposed Project and limited visibility with the extensive flat landscape, cumulative effects are only mostly limited to elevated vantage points within the Landscape and Visual Impact Assessment ('LVIA') Study Area.

Cultural Heritage

Chapter 14 of the EIAR considers the potential cumulative effect that may arise from proposed and permitted developments within the study areas of the Site and how the construction and operation of this infrastructure (in combination with the Proposed Project) may cumulatively impact upon archaeological, architectural and cultural heritage sites.

In relation to the construction phase, Chapter 14 of the EIAR concludes that given that any archaeological remains identified within the footprint of the Proposed Project will be preserved in-situ or by record, no negative cumulative construction effects with other windfarms have been identified.

In relation to the operational phase, Chapter 14 of the EIAR concludes that no indirect effects have been identified as a result of the Proposed Project to AH96, a crannog subject to Preservation Orders. The existing Mace Upper, Cloontooa and Ballykinava Wind Farms are within 1.7–6.3km to the south and west of AH96, and additionally the Magheramore Wind Farm is located c. 2.1km to the east of AH96. Whilst these wind farms have indirect effects upon AH96, the addition of the Proposed Project will not increase these effects. The Proposed Project is likely to have slight indirect negative effects to AH97, a ringfort that is subject to Preservation Orders. No cumulative effects are predicted to AH97, as no additional wind farms are located within 10km of the monument. Cumulative effects have also been assessed for the remaining archaeological (AH), architectural (BH and DL) or cultural heritage (CH) resource. No negative cumulative effects have been identified to these heritage receptors. Whilst the wind farms will be visible in the wider landscape, their presence would not increase the significance of effect that is predicted to occur on any one site from the Proposed Project on its own.

Traffic and Transport

Chapter 15 of the EIAR includes an assessment of all existing, permitted, and proposed projects were assessed for the potential for cumulative traffic and transport effects with the Proposed Project.

The other permitted and proposed wind farm developments within a 25 km buffer zone around the Proposed Turbines of the Proposed Wind Farm that were considered to have potential traffic related cumulative impacts are set out in the Chapter. Developments consisting of single domestic turbines have not been considered further in the cumulative assessment as the scale of construction traffic associated with these would be considered insignificant and therefore would not have a cumulative impact when associated with the Proposed Project.

It is noted that the port of entry/exit for the 1 no. proposed wind farm (Shancloon WF) will likely be the Port of Galway, therefore, there is the potential that there could be cumulative impacts at the port and on the turbine delivery routes in close proximity to the port should the delivery of the turbines for one or more of these developments be done simultaneously. It is, however, the case that even if the port has the handling and storage capacity to provide for more than one of these developments at a time, typically the Garda would limit the delivery from the port to one convoy of 3 vehicles per night, so the cumulative impacts would not occur at this location.

Chapter 15 of the EIAR concludes that it is estimated that Shancloon WF has a medium potential for cumulative impacts to occur with the Proposed Project. In the event that the construction of the Proposed Project coincides with the construction phase of Shancloon WF, it is forecast that the traffic related cumulative impacts would be negative, short-term and slight, based on the potential overlap of Turbine Delivery Routes ('TDR') and associated traffic generation. It is therefore proposed that the construction phase of the Proposed Project will be scheduled, where possible, to avoid the overlap of the construction

phases of this proposed wind farm development. This will ensure that the potential for cumulative effects is minimised.

It should be noted that the Shancloon WF was refused by the Commission under ACP Case Ref. 323699 on the 21st of September 2026 and the 8-week period to apply for judicial review expires on 16th of November 2026.

3.5 Agricultural, Equine and Livestock Impacts

Concerns have been raised about the impact of the Proposed Grid Connection on the equine industry, livestock and local agricultural practises. Concerns regarding flooding of land within the Site, this including farmland, is discussed in Section 3.11.3 below.

Response

Section 5.2.3.5.1 of Chapter 5 of the EIAR addresses the potential for impacts on the equine industry. In the absence of national policy or guidance in relation of the development of wind farms near stud farms/equestrian centres in Ireland, MKO has reviewed the British Horse Society's *'Advice on Wind Turbines and Equestrian Access'*. A copy of the guidance document is included in Appendix 5-2 of the EIAR.

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

Furthermore, Section 5.5.2.1.3 of Chapter 5 of the EIAR provides the impact assessment of the construction phase of the Proposed Project on land use patterns and activities, with pastoral agriculture, peat bogs and private forestry being identified as the current land use within the Site. It is acknowledged that there will be a short-term slight negative effect on existing land-use patterns within the Site for the duration of the construction phase which is not significant. Section 5.5.3.1.3 of Chapter 5 of the EIAR provides the impact assessment of the operational phase of the Proposed Project on land use patterns and activities.

MKO remains satisfied that the impacts on the equine industry, agricultural practises and livestock are considered and have been fully assessed within the EIAR. It is noted that farming practices will not be impacted during the operational phase. The addition of new tracks throughout the Site will enable access for landowners throughout their lands. This will have a long-term, imperceptible, positive, direct impact on land use, and is Not Significant.

3.6 Consideration of Reasonable Alternatives

Submissions have raised concerns about the consideration of reasonable alternatives for the Proposed Project, relating to site selection, alternative renewable energy sources being more suited, alternative locations for the 110kV substation and local wind energy zoning criteria.

Where submissions have raised concerns over the proposed turbines, or alternatives in relation to the Proposed Wind Farm elements this has not been considered further as these elements do not form part of the Proposed Grid Connection application.

Response

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

As outlined in Section 3.2.5.1 of Chapter 3 and Section 2.5.4.3 of Chapter 2, the Proposed Grid Connection was designed following a constraints-led assessment. Furthermore, the Proposed Grid Connection is located within an area designated as 'Open for Consideration' under Mayo County Council's Wind Energy Strategy. Accordingly, the location is considered appropriate for the Proposed Grid Connection development.

Alternative locations for the Proposed Grid Connection are assessed and discussed in Section 3.2.6.2.1 of Chapter 3. The selected location for the Proposed Grid Connection was informed by a constraints-led assessment, which identified environmental constraints associated with the alternative options considered. The selected option was determined to have the least potential for environmental impacts. In particular, the alternative routes would require crossing Irish Rail infrastructure and a watercourse. These constraints were key considerations in the assessment of alternatives and informed the selection of the preferred route, which sought to avoid or minimise potential environmental impacts.

As discussed in Section 3.2.6.1 of Chapter 3, alternative layouts and locations for the Proposed Project/Proposed Grid Connection were assessed and found to have a greater potential for impacts on sensitive ecological receptors, particularly due to the siting of infrastructure within designated setback buffers for marsh fritillary and Annex I habitats. Alternative locations were also identified as having greater potential impacts on peat, topsoil and subsoil. Accordingly, the preferred location and layout were selected to minimise environmental impacts, with a reduced infrastructure footprint to further limit potential ecological effects.

3.7 Population and Human Health

3.7.1 Shadow Flicker

Concerns have been raised regarding shadow flicker from the Proposed Project. Shadow flicker will only occur from the proposed turbines element of the Proposed Project, with no shadow flicker being associated with the Proposed Grid Connection. As such, this is considered not applicable in the context of the planning application of the Proposed Grid Connection and has not been discussed further in this document.

3.7.2 Electro Magnetic Fields

Multiple observations raise concern regarding the potential health impacts on residents living in proximity of the Proposed Grid Connection, with particular concern being raised in regard to Electromagnetic Fields (EMF).

Response

The study of electricity transmission infrastructure and potential health effects is an ongoing and complex area of research. A part of this body of evidence is a literature review entitled *"Literature review of electromagnetic fields (EMF) and human health, and an evidence base of EMF measurements from the Irish Transmission System"*, which was commissioned by EirGrid and prepared by RPS Group in July 2014. This study sought to both review existing literature, as well as measure existing EMF generated by a range of high-voltage electricity transmission infrastructure in Ireland.

As stated in Section 5.3.4.4 of Chapter 5, the extremely low frequency (ELF) electric and magnetic fields (EMF) associated with the operation of the proposed cables fully comply with the international guidelines for ELF-EMF set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP), a formal advisory agency to the World Health Organisation, as well as the EU guidelines for human exposure to EMF. Accordingly, there will be no operational impact on properties (residential or other uses) as the ICNIRP guidelines will not be exceeded at any distances even directly above the cables. This has also been addressed in Section 15.2.4.1.4 of Chapter 15.

Furthermore, as stated in Chapter 5, Section 5.3.4.4 of the EIAR, the ESB document 'EMF & You' (ESB, 2017)[2] provides further practical information on EMF. To summarise, ESB iterate that established national and international scientific agencies have consistently concluded that their research does not indicate that EMF causes any adverse health effects (on human health or animals) at levels encountered in our everyday environment.

Given the Proposed Grid Connection route is located within cable sheath and located entirely underground, direct exposure to the public is limited. According to the aforementioned EirGrid study, the maximum magnetic field strength measured at all overhead lines, underground cables and substation perimeters surveyed was well below the ICNIRP public exposure reference level, set to protect public health. Furthermore, the study found that *"There is no electric field above ground level for underground cables, as the field is fully screened by the cable sheath"*.

As such, having regard to the nature of the Proposed Grid Connection and the available scientific data, no significant health effects in relation to EMF are anticipated for residents living in close proximity to the Proposed Grid Connection infrastructure.

3.7.3 Health and Safety, Fire Risk

Observations have raised concern regarding the potential health and safety impacts on residents living in proximity of the 110kV Substation proposed as part of the Proposed Grid Connection, with concern being raised in regard to fire safety risk.

Response

Section 5.5.2.2.1 of Chapter 5 of the EIAR provides the impact assessment of the Proposed Project in relation to health and safety during the construction phase, with Section 5.5.3.2.1 relating to the operational phase of the Proposed Project. Furthermore, Chapter 16 of the EIAR discusses fire risk of the Proposed Project in Section 16.4.1.9. It is considered that the risk of significant fire occurring, impacting the Proposed Project and causing it to have significant environmental effects is limited. The rigorous safety checks imposed on turbines and associated infrastructure during design, construction, commissioning, and operation ensures the risks to humans are negligible.

[2] *EMF & You: Information about Electric & Magnetic Fields and the electricity network in Ireland Available at:* https://esb.ie/docs/default-source/default-document-library/emf-public-information_booklet_v9.pdf?sfvrsn=0.

As such, based on the assessment carried out the Proposed Grid Connection is not anticipated to have any significant effects in relation to health and safety or fire risk for any phase of the Proposed Grid Connection.

3.7.4 Residential Amenity

Concerns have been raised regarding residential amenity and quality of life in relation to the Proposed Project. Submissions detail noise, visual effects, disruption to peace and tranquillity and rural value of the local areas surrounding the Site.

Response

As described in Section 5.3.6 of Chapter 5 of the EIAR, residential amenity relates to the human experience of one's home, derived from the general environment and atmosphere associated with the residence. The quality of residential amenity is influenced by a combination of factors, including setting and local character, land-use activities in the area and the relative degree of peace and tranquillity experienced in the residence. Impacts relating to residential amenity of the Proposed Grid Connection are discussed in Section 5.5.2.1.6 and Section 5.5.3.1.6 for the construction and operation phase of the Proposed Grid Connection, respectively.

The noise and vibration assessment is detailed in Chapter 12 of this EIAR. It should be noted that the Proposed Project will comply with the noise thresholds imposed on the development by the consenting authority should permission be granted for the Proposed Project. Section 12.6.3.2 of Chapter 12 discusses the operational phase noise effects associated with the proposed 110kV Substation. It is noted herein that noise prediction model calculations for the operation of the proposed onsite 110kV substation have been undertaken in accordance with ISO 9613: '*Acoustics – Attenuation of sound during propagation outdoors, Part 2: Engineering method for the prediction of sound pressure levels outdoors'* (2024). The predicted noise level from the operation of the proposed onsite 110kV substation at the nearest Noise Sensitive Location (NSL) at approximately 366 m northwest is 30 dB $L_{Aeq,T}$. This level of noise is below the criterion for fixed mechanical plant outlined in Section 12.3.2.6 and will not result in an adverse impact at nearby NSLs. Furthermore, a cumulative assessment has been undertaken to consider the proposed 110kV Substation, which is included in Section 12.9.2 of Chapter 12 of the EIAR.

A few observations raise the issue of a tonal 'hum' arising from elements of the Proposed Project during the operational phase, such as the 110kV substation. Tonality has been discussed in Section 12.3.2.5.10 of Chapter 12 and Section 13.3.2.6.2. Wind farm noise guidelines such as those of ETSU-R-97, assume that the wind turbine noise does not normally contain clearly audible tones. It is not possible to predict the occurrence of tonality on a project reliably at the planning stage. The unlikely occurrence of tonality of the proposed 110kV substation of the Proposed Project will be managed through the commitments provided by the Applicant in Section 12.7.2.2.

The visual impact of the Proposed Wind Farm is addressed in Chapter 13 Landscape and Visual. The turbine locations have been designed to maximise turbine separation distances to dwellings in the area.

The Proposed Grid Connection route is located within private lands and underground; therefore, no residential amenity effects are deemed to arise from this element.

3.7.5 Health

Some Third-Party Observers raise concerns in relation to the potential of negative health effects associated with the Proposed Project. Concern was raised regarding potential for health impacts on vulnerable members of the community, as well as around mental health and wellbeing. Concerns have also been raised in relation to microplastics and chemicals emitted as a result of the Proposed Project. One submission has raised concern over BPA coating used on turbine blades which may have negative health

impacts. The proposed turbines form part of the Proposed Wind Farm application and as such this is considered not applicable in the context of the planning application of the Proposed Grid Connection.

Response

Section 5.3.4 of Chapter 5 of the EIAR address the concerns raised in the submissions regarding Human Health. This human health analysis section was assessed using best guidelines set out in Section 5.1.2 of Chapter 5. Please refer to these sections for further details.

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

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

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

3.7.6 Lighting

Submissions have raised concern over operational phase lighting proposed as part of the Proposed Project, both in relation to turbine lighting and lighting at the proposed 110kV substation. Submissions raise concern over the lighting proposed negatively impacting the dark rural environment in which the Site is located. The proposed turbines do not form part of elements proposed as part of the Proposed Grid Connection applications and as such the response below considers submissions raised in relation to lighting requirements at the 110kV substation and Proposed Grid Connection infrastructure.

Lighting requirements associated with the Proposed Grid Connection in relation to ecological effects and bats is also discussed in Section 3.8.4.3 below.

Response

During the construction phase, lighting requirements will be temporary and limited to areas where required for health, safety and security purposes, including temporary compounds and the proposed 110 kV on-site substation.

During the operational phase, lighting within the Proposed Project will be minimal. During the operational phase, external lighting associated with the proposed 110 kV substation will be installed in accordance with contractor and EirGrid security and operational requirements. Operational lighting requirements are expected to be limited and infrequently used. External lighting associated with the proposed 110 kV substation and ancillary infrastructure will primarily comprise security and maintenance lighting and will be motion-activated rather than continuously illuminated.

The proposed lighting strategy will also adhere to Dark Sky Ireland principles, ensuring that lighting is only used where necessary, directed appropriately, and maintained at the minimum intensity required for operational and safety purposes.

3.7.7 Property Values

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

Response

Section 5.3.5 of Chapter 5 of the EIAR addresses the potential for impacts on property values. As stated in Section 5.3.5.1 which looks at property values and wind farms, based on a review of available literature there is insufficient evidence from the scientific literature and studies conducted to determine that there is the potential for a significant effect on property values as a result of the Proposed Project. Section 5.3.5.2 of Chapter 5 further states that based on the literature review and evidence-based field study described it can be concluded that it is unlikely that the Proposed Grid Connection will have a significant effect on property values.

3.8 Biodiversity

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

3.8.1 Habitat Loss and Fragmentation

Submissions have raised concern over loss of habitats on Site, such as peatland habitat, transition mire, hedgerow, scrub and trees disrupting foraging corridors and networks with this negatively impacting and displacing local biodiversity.

Response

Habitat loss and fragmentation as a result of the Proposed Project has been assessed for each Key Ecological Receptor (KER) for the construction phase in Section 6.5.2 of Chapter 6 of the EIAR, with no significant effects being anticipated. While the Proposed Project will result in the loss of 1,627m of treeline and hedgerow habitat, it is proposed to plant approximately 2,500m of new and bolstered treeline and hedgerow habitat within the Site which has been strategically chosen to link up existing areas of bat activity. See Section 3.2 of Appendix 6-4 for further detail on proposed planting of hedgerow and treeline proposed as part of the Proposed Project enhancement proposals.

Loss of hedgerow habitat and impacts this may have on local cultural heritage has also been raised in submissions and is addressed in Section 3.15 below.

3.8.2 Molinia Meadows

Submissions have raised concern over fragmentation and damage to Annex I Molinia meadow habitat within the Site.

Response

As depicted in Section 6.2.3.2 of Chapter 6 of the EIAR, the assessment of grassland areas within the Site identified as having potential to conform to the Annex I habitat *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*) [6410] was undertaken in line with Irish Wildlife Manual No. 102 '*The monitoring and assessment of three EU Habitats Directive Annex I grassland habitats*'

(Martin *et al.,* 2018)[3] and the references therein. As stated in Section 6.4.3, areas of species-rich wet grassland were identified at a number of locations within the Site. Areas of wet grassland which were found to conform to the Annex I habitat 'Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410] are considered to be of County Importance. The areas of Annex I Molinia meadow were identified at an early stage in the Project design and the layout of the Proposed Project was specifically designed to avoid these areas. There will be no direct loss of these habitats.

Nonetheless, there is potential for indirect effects on this habitat where it occurs in close proximity to the construction footprint. In addition, there will be some loss of species rich wet grassland at the location of Turbine 4. No areas of Molinia meadow encroach on the Proposed Grid Connection infrastructure. Therefore, areas of species rich wet grassland, including those areas that conform to the Annex I habitat Molinia meadow, are included as a KER. Assessment of effects on this habitat, which include consideration to drainage effects, are presented in Section 6.5.2.1.4 of Chapter 6 which concludes no significant residual effects.

The Biodiversity Management and Enhancement Plan (BMEP; Appendix 6-4) provides for the enhancement of 1.16ha of Molinia meadow in this area to the southeast of proposed Turbine 6. It is envisaged that this management and enhancement will allow the improvement of the current deteriorated condition of this area, as outlined in detail within the BMEP.

3.8.3 Peatland habitats

Submissions raise concern over ecologically sensitive peatland habitats present on Site, such as Annex I Transition mires and quaking bogs, cutover bog and remnant raised bog.

Response

Peatland habitats present on Site are described in detail in Section 6.4.1.1 of Chapter 6 of the EIAR, based on detailed site surveys carried out. Peatland habitat predominantly comprised of cutover bog which has been subject to recent and historical turbary activities cover a large part of the Site. However, an area of uncut raised bog was also recorded to the west of the Site with a small marginal area at its southern extent occurring within the Site. The potential for areas of remnant raised bog within the Site to conform to the Annex I habitats Active raised bog [7110] (ARB) and Degraded raised bog still capable of natural regeneration [7120] (DRB) was considered in Section 6.4.1.1.1 and Section 6.5.2.1.2 of Chapter 6. Furthermore, this has been assessed from a drainage and hydrological perspective in Section 9.5.2.17 of Chapter 9 Water of the EIAR. No significant residual effects on areas of remnant raised bog are anticipated as a result of the Proposed Project.

An assessment of potential effects of the Proposed Project during the construction phase on cutover bog and associated habitats such as Transition Mire and Quaking Bog are considered in Section 6.5.2.1.3 which concludes no significant impacts.

3.8.4 Existing Wildlife

3.8.4.1 Badger

A submission has noted presence of badger within the Site which has been recorded by local residents and concerns over the construction phase of the Proposed Project on badger.

[3] *Martin, J.R., O'Neill, F.H. & Daly, O.H. (2018) The monitoring and assessment of three EU Habitats Directive Annex I grassland habitats. Irish Wildlife Manuals, No. 102. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Ireland.*

Response

As noted in Section 6.2.3.3.1 of Chapter 6 Biodiversity, badger surveys were undertaken at the Site. The badger survey was conducted adhering to best practice guidance (TII, 2008a) and followed the *'Guidelines for the Treatment of Badger Prior to the Construction of National Roads Schemes'* (TII, 2006) and CIEEM best practice competencies for species surveys (CIEEM, 2013[4]). As stated in Section 6.4.2.1 of Chapter 6, an individual badger was observed during ornithological surveys within the Site on one occasion, which was an observation of a single individual foraging at dusk within an agricultural field in the north of the Site in May 2025. Badger signs were also identified in the southeast of the Site in the form of tracks and prints along the margins of wet grassland habitats. No active or potential breeding locations for badger were identified within the Site during the dedicated badger surveys or any of the other surveys undertaken within the Site.

As stated in Section 6.4.3 of Chapter 6, the badger as an ecological receptor has been assigned Local Importance (Higher Value) on the basis that the habitats within the Site are utilised by a locally occurring badger population of Local Importance and is identified as a Key Ecological Receptor (KER). The impact assessment on badger during the construction phase is presented in Section 6.5.2.2.1 of Chapter 6 which concludes no significant residual effects.

3.8.4.2 Marsh Fritillary Butterfly

A number of submissions raised concern over marsh fritillary present within the Site and suitable Marsh Fritillary habitat within the site which could be impacted as a result of the Proposed Project during the construction phase.

Response

The potential for significant effect on Marsh Fritillary is assessed in Section 6.5.2.2.5 of the EIAR, with mitigation provided to prevent loss of breeding habitat and dust mitigation during the construction phases of the Proposed Project. Following the incorporation of the mitigation measures described in Section 6.5.2.2.5, no significant negative effects on marsh fritillary are anticipated at any geographic scale.

The BMEP (Appendix 6-4 of the EIAR) also outlines measures for the protection of Marsh Fritillary during the construction phase of the Proposed Project, as well as measures to enhance existing, and create additional habitat for marsh fritillary. The BMEP proposes enhancement of 1.16ha of Annex I Molinia meadow, which currently contains pockets of suitable marsh fritillary breeding habitat but in which no larval webs were identified. These enhancement measures will provide dual benefits for both the Annex I habitat and marsh fritillary butterflies, as outlined in detail within the Biodiversity Management and Enhancement Plan. It is envisaged that this management and enhancement will allow the expansion of the current pockets of suitable marsh fritillary habitat within this area, which are classified as Suitable (Under-grazed) in their current state, and thus will result in a net gain in availability of suitable habitat for the species within the Site as a result of the Proposed Project. In addition, it is also proposed to implement monitoring of existing marsh fritillary breeding areas within the Site. These measures will not only offset any potential loss of habitat but will result in a net gain and enhancement of the suitable marsh fritillary habitat within the Site.

3.8.4.3 Bats

Observations of bat roosting within the Proposed Wind Farm Site are noted. Concerns have also been raised in relation to artificial lighting and electromagnetic interference which may disrupt bat navigation

[4] *CIEEM (2013) Technical Guidance Series – Competencies for Species Survey, Online, Available at: https://cieem.net/resource/competencies-for-species-survey-css/ [Accessed: 25/02/2026]*

and bat foraging habitat, with concerns raised over fragmentation of bat habitats and commuting routes as a result of the Proposed Project.

Submissions have also raised concern over collision risk and barotrauma relating to several bat species associated with the proposed turbines proposed as part of the Proposed Project. No collision risk is associated with the Proposed Grid Connection and the associated infrastructure proposed as part of this planning application. As such, this is considered not applicable in the context of the planning application of the Proposed Grid Connection and has not been discussed further in this document.

Response

A full assessment of impacts of the Proposed Project on bats is included as Appendix 6-2 of the EIAR, and details summarised within Chapter 6 Biodiversity of the EIAR within Section 6.5.2.2.3. A search for bat roosts was undertaken within 200 m plus the maximum rotor radius (i.e. 81.5 m) of the Proposed Turbines in line with NatureScot 2021 guidance. As stated in Section 2.2 of Appendix 6-2 of the EIAR, two structures were identified as potential roost features within the Site. These were subject to a roost assessment which comprised a detailed inspection of the interiors and exteriors to look for evidence of bat use, including live and dead specimens, droppings, feeding remains, urine splashes, fur oil staining and noises.

No trees with potential roost features were identified within the Site following bat habitat suitability appraisal and walk-over surveys. As stated in Appendix 6-2 of the EIAR, Section 5.3, vegetation clearance associated with the Proposed Grid Connection includes the removal of a small number of trees of mixed species. A limited number of these trees were identified as supporting features with the potential to accommodate individual bats or small numbers of bats (PRF-I), including cavities, cracks and areas of mature ivy. No evidence of bat roosting was recorded during detailed inspections of these features. As such, while a minor loss of potential roosting features will occur, there is no evidence to indicate that any active roosts will be affected.

As stated in Section 6.5.2.2.3 of Chapter 6, the Proposed Project will result in the removal of approximately 1,256m of linear vegetation associated with the infrastructure footprint, including the Proposed Grid Connection, to facilitate the construction of turbine bases, access tracks and associated infrastructure. This includes vegetation removal required to implement bat buffers. This has the potential to result in localised loss of bat commuting routes and foraging habitat and may result in temporary effects on habitat connectivity within the Site.

Taking into consideration the embedded design of the Proposed Project and the implementation of standard best practice and habitat enhancement measures, no significant residual effects on bats are anticipated as a result of the construction phase.

Effects associated with loss or damage to commuting and foraging habitat, loss of, or damage to, roosts, displacement of individuals or populations, and disturbance are predicted to be localised, temporary and not significant.

Lighting and Electromagnetic Interference

Potential disturbance effects associated with lighting and operational noise have been considered in Section 5.4 of Appendix 6-2, in accordance with current guidance, including recent recommendations from Bat Conservation Ireland (BCI, 2026).

During the construction phase, temporary security and task lighting may be required around construction compounds and the proposed on-site substation. These lighting requirements will be temporary and localised in nature. Lighting will be designed and managed to minimise light spill onto adjacent habitats through the use of directional, low-intensity, warm-spectrum lighting, cowls/shields where appropriate, and activation only where required for health, safety and security purposes. No permanent illumination of retained treelines, hedgerows or other key bat commuting features is proposed.

During the operational phase, external lighting associated with the proposed 110 kV substation will be installed in accordance with contractor and EirGrid security and operational requirements. Operational lighting requirements are expected to be limited and infrequently used. Any permanent lighting will be designed to minimise illumination of adjacent habitats and linear features through directional lighting design and minimisation of unnecessary light spill. Given the low to moderate suitability of habitats within the Site, the low overall levels of recorded bat activity, and the retention of dark commuting corridors, significant lighting-related displacement effects are not anticipated.

Operational noise associated with the wind turbines and substation will be primarily limited to low frequency audible noise, which does not overlap with the ultrasonic frequencies used by bats for echolocation. On this basis, operational noise is not considered to represent a significant pathway for behavioural disturbance in the context of the Proposed Project.

Further detail on lighting restrictions and mitigation measures which will be in place for the Proposed Project are included in Section 6.1.2 of Appendix 6-2 of the Bat Report.

3.8.4.4 Other species

Third-party submissions are also made on other species noted by residents in proximity to the Site and potential impacts that the development may have, as well as impacts on overall local wildlife and biodiversity. Concerns have also been made over habitats fragmentation that the development may have on certain species due to earthworks and construction works associated with the construction phase of the Proposed Project. These include the following:

- Foxes
- Stoat
- Irish Hare
- Pollinators
- Invertebrate species
- Botanical species

Response

It is noted that several of these species have been identified within the Site. A comprehensive survey of the biodiversity within the Site was undertaken to inform Chapter 6 Biodiversity of the EIAR. Ecological surveys were undertaken in line with TII (2008) guidelines (Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes). Please see Section 6.2.3 of Chapter 6 of the EIAR for full details of any specific methodologies used for surveys including marsh fritillary, bats and botanical assessments. See Appendix 6-1 for further detail on botanical assessments undertaken at the Site.

The results of the desk study, scoping replies and incidental records of protected species recorded during multidisciplinary walkover surveys were all used to inform the scope of targeted ecological surveys required. Based on these findings dedicated surveys for bats, badger and Japanese knotweed were undertaken. During the multidisciplinary walkover surveys, records of invertebrates including butterflies, damselflies, dragonflies, moths, beetles etc. were recorded. As suitable marsh fritillary habitat was identified following initial site visits and based on records in the wider area following the desk study, dedicated marsh fritillary butterfly surveys were carried out (see section below).

For all species identified on the Site, the potential impacts of the Proposed Project during the construction, operational and decommissioning phases have been assessed (see Section 6.5 of Chapter 6 of the EIAR). The ecological effects of potential impacts arising from the Proposed Project are characterised as per the CIEEM *'Guidelines for Ecological Impact Assessment in the UK and Ireland'* (2018). effects were identified during the assessment, significant effects relating to disturbance and/or mortality are not anticipated following the implementation of the mitigation measures proposed in Chapter 6 of the EIAR.

Accordingly, no significant negative effects on any identified species are anticipated at any geographic scale.

3.8.5 Aquatic Ecology

Concerns have been raised in relation to Aquatic Ecology associated with Dromady Lake, Lough Fark and local downstream watercourses. A number of different species of concern are said to be omitted or inadequately assessed, including Otter, White-clawed Crayfish and European Eel.

Response

Otters are adequately assessed within Section 6.5.2.2.2 of the EIAR. It details the description of effects and mitigation relating to direct habitat loss/fragmentation, disturbance and mortality, as well as habitat degradation and potential impacts on water quality. There are no impacts for the otter population in respect to direct habitat loss/fragmentation, disturbance and mortality. Mitigation is provided to reduce the impacts on water quality, ensuring no significant negative effects on otter are anticipated at any geographic scale.

Aquatic surveys were undertaken at 8 locations. Surveys undertaken at each of the survey sites included a fisheries assessment (electro-fishing and/or fisheries habitat appraisal), white-clawed crayfish survey, macrophyte and aquatic bryophyte survey and (where suitable) biological water quality sampling (Q-sampling) and macro-invertebrate sweep sampling. In addition, to validate site surveys and to detect potentially cryptically-low populations, composite water samples were collected from the Meander River and the unnamed tributary of the River Robe and analysed for lamprey (*Lampetra sp.*), European eel (*Anguilla anguilla*), freshwater pearl mussel (*Margaritifera margaritifera*), white-clawed crayfish (*Austropotamobius pallipes*) and crayfish plague (*Aphanomyces astaci*). As with all aquatic baselines, the survey focused on those watercourses and waterbodies with evident hydrological connectivity to the Proposed Project.As outlined in Section 9.3.5 of Chapter 9 Hydrology and Hydrogeology, the north of the Site is drained by a network of man-made drainage features which direct water north towards Lough Fark. Lough Fark was thoroughly assessed as a sensitive receptor regarding its hydrological connectivity to the Proposed Project via man-made drainage throughout Chapter 9 Hydrology and Hydrogeology.

No works are proposed within the delineated 100m lake buffer of Drumady Lough and Lough Nambrackkeagh with the exception of some treeline and hedgerow planting/ enhancement and native broadleaved woodland planting. Lough Fark is located approximately 630m to the north of the Site at its nearest point. These loughs are identified as surface water receptors for impact assessment in Section 9.3.16 and specifically identified and considered in detail during the construction phase within Sections 9.5.2.1/2/3/5/6/7/8/9 in relation to tree felling and removal, suspended solid entrainment in surface waters as a result of earthworks, surface water quality deterioration from excavation dewatering, leakages or spillages of hydrocarbons, use of cement-based products, wastewater, morphological changes to surface watercourses and drainage patterns and use of Siltbuster. During the operational phase, these loughs are also identified as receptors and considered within Sections 9.5.3.1 and 9.5.3.2 in relation to the replacement of natural surfaces with lower permeability surfaces and runoff resulting in contamination of surface waters. Detailed mitigation and monitoring measures are outlined within each of these sections in order to avoid and/or reduce any potential impacts on downstream aquatic receptors and as such no significant residual effects are predicted.

Within Chapter 6 Biodiversity of the EIAR, potential effects on aquatic habitats and associated aquatic species during construction and operation are also fully considered within Sections 6.5.2.1.1 and 6.5.3.1.1, respectively. Mitigations are also assigned where potential significant effects are anticipated, including in relation to direct disturbance and mortality of aquatic species during proposed in-stream works along the Proposed Turbine Delivery Route, as well as in relation to potential water quality deterioration. These measures will ensure that there will be no significant residual effects on any aquatic receptors, including white-clawed crayfish and European eel as identified within Third-Party Submissions. Potential effects on otter and smooth newt are also addressed separately in relation to direct habitat loss/fragmentation,

disturbance and mortality and impacts on water quality during construction in Sections 6.5.2.2.2 and 6.5.2.2.4, respectively. With the implementation of mitigation measures prescribed within these sections, there is no potential for significant residual effects on any Key Ecological Receptors as a result of the Proposed Grid Connection.

3.8.6 Appropriate Assessment

Concerns have been raised in relation to the Appropriate Assessment undertaken for the Proposed Project. The Lough Carra/Mask SAC, River Moy SAC and Balla Turlough SAC have been raised. Concerns have also been raised regarding site drainage into the SAC/ SPA network.

Response

A full and comprehensive Appropriate Assessment and Natura Impact Assessment were completed for the Proposed Project which considers both the Proposed Grid Connection and Proposed Wind Farm. This NIS has provided an assessment of all potential direct or indirect adverse effects on European Sites, taking into account all relevant guidance including the European Commission's Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC (EC, 2021).

Section 4 of the AA/ NIS identifies relevant European Sites at various distances to the Proposed Project. A full assessment of all possible source-pathway-receptor connections was considered, which formed the basis as to whether a European Site is considered to be within the Likely Zone of Influence and included for further assessment. An assessment is provided of 3 no. European Sites following the conclusion of Section 4.2, these being:

- River Moy SAC]002298]
- Balla Turlough SAC [000463]
- Lough Mask SPA [004062]

Section 6.5 of the AA/ NIS provides a detailed overview in relation to water quality and drainage. It is noted that there is hydrological connectivity between the Proposed Project and the River Moy SAC via drainage ditches within and the Meander River adjacent to and downstream of the Site, therefore in the absence of mitigation the potential for adverse effects on this European Site has been identified as a result of surface and groundwater quality deterioration. The NIS concludes that no adverse effects on the hydrological and hydrogeological environment will occur during the construction, operational or decommissioning phases of the Proposed Project.

Section 9 of the AA/ NIS concludes that Proposed Project will not adversely affect the integrity of any European Sites, either alone or in combination with other plans or projects, with Section 8 of the AA/ NIS providing an assessment of cumulative effects.

3.8.7 Invasive Species

Submissions have been raised concerning the spread of invasive species, namely Japanese Knotweed, throughout the Site during the construction phase of the Proposed Project.

Response

An assessment of the potential spread of invasive species at the Site is included in Section 6.5.2.1.7 of Chapter 6 of the EIAR. There is potential for the disturbance and spread of Japanese Knotweed within and outside the Site as a result of the construction of the Proposed Project due to the proposed upgrades to the existing access track, as well as the regular tracking of construction vehicles along this road. a site-specific Invasive Species Management Plan (ISMP) has been prepared and is presented in Appendix 6-5

of this EIAR. The management plan includes detailed measures for the treatment of Japanese knotweed within and adjacent to the construction footprint, including excavation, chemical treatment and ongoing monitoring over a number of years to monitor for and treat any regrowth.

As outlined within the ISMP, a pre-commencement invasive species survey will be undertaken by a fully qualified ecologist to determine the current location and extent of Japanese knotweed within and adjacent to the Site and to identify any changes in the extent of the Japanese knotweed infestation since the surveys undertaken to inform this Biodiversity Chapter and the ISMP for the Proposed Project. Surveys shall be conducted in the summer months (June–July) when stands are most visible.

Following the implementation of this ISMP and associated monitoring plan, no potential for significant effect exists at any geographic scale.

3.8.8 Limitations of Ecological Surveys

Submissions have raised concern over scope of ecological surveys not showing a complete representation of wildlife present at the Site and outdated guidance used.

Response

Section 6.2 of Chapter 6 of the EIAR describes the methodologies followed to establish the baseline ecological condition of the Site and surrounding area. Section 6.2.3 of Chapter 6 describes the ecological surveys that have been undertaken at the Site and details of the methodologies, dates of survey and guidance followed. Ecological surveys at the site included the following:

- Multidisciplinary ecological walkover surveys
- Habitat and vegetation composition surveys
- Badger surveys
- Bat surveys
- Camera trap surveys
- Marsh Fritillary surveys
- Aquatic surveys

Surveys were undertaken between 2023 – 2026, with industry best practise guidance being followed, as detailed in Section 6.2.3 for each survey type. Bird survey scope and methodologies used are detailed in Chapter 7 Ornithology of the EIAR.

3.9 Birds

Submissions have raised concern over collision risk relating to birds associated with the proposed turbines proposed as part of the Proposed Project. No collision risk is associated with the Proposed Grid Connection and the associated infrastructure proposed as part of this planning application. As such, this is considered not applicable in the context of the planning application of the Proposed Grid Connection and has not been discussed further in this document.

3.9.1 Curlew

Submissions raised concerns about local curlew populations and how the development would impact curlew.

Response

As outlined in Section 7.3.7.12 of Chapter 7, there are no key foraging areas within the Site for curlew, and no evidence of roosting present within the Site for curlew based on bird surveys undertaken. Impacts associated with the Proposed Grid Connection are outlined in Section 7.5.3 of Chapter 7, which concludes that the effect significance for all Key Ornithological Receptors (KORs) is assessed as no greater than Low (Percival, 2003) and is a likely short-term slight negative effect which is not significant (EPA, 2022).

Furthermore, Section 7.9.3.4 of Chapter 7 contains a cumulative impact assessment for curlew. The potential for other developments to have resulted in significant cumulative or in combination effects when assessed alongside the Proposed Project was considered. No significant cumulative impacts are predicted.

3.9.2 Other Species

Third-party submissions are also made on other species sighted during field surveys regarding their presence in proximity to the Site and potential impacts that the development may have. These include the following:

- Sparrowhawk
- Kestrel
- Buzzard
- Hen harrier
- Lapwing
- Whooper Swan
- Meadow pipit
- Common Cuckoo
- Golden plover
- Lesser Black-backed gull
- Snipe
- Pheasant
- Merlin

Response

Table 7-13 in Chapter 7 Ornithology of the EIAR outlines the rationale for including or excluding each target species recorded during field surveys as a KOR. The status, population importance evaluation following NRA (2009) and a detailed explanation for inclusion/exclusion as a KOR is provided. The sensitivity of species included as KORs are then evaluated in Section 7.4.3 of the EIAR. Following the mitigation measures described in Section 7.6 of the EIAR, no effect significance greater than Low**,** as per Percival (2003) criteria, was identified for any KOR. As per Table 7-15 of Chapter 7, no effect significance greater than likely long-term slight negative effect, which is not significant, as per EPA (2022) criteria, was identified for any KOR. Taking into consideration the effect significance identified and the proposed best practice mitigation measures, significant residual effects on the KORs with regard to direct habitat loss, disturbance/displacement or collision mortality are not anticipated.

3.9.3 Bird Atlas Records

Submissions have raised concerns over breeding bird atlas data used, stating that it is outdated.

Response

As outlined in Section 7.3.2 of Chapter 7, 'Bird Atlas 2007-11: The breeding and wintering birds of Britain and Ireland' (Balmer *et al.*, 2013) is the most recent comprehensive work on wintering and breeding birds in Ireland and as such as been used to inform baseline conditions at the Site. Section 7.3 of Chapter 7

contains other sources and guidance used to inform a desktop and baseline analysis at the site. Field surveys results are also summarised in Section 7.3.7. of Chapter 7, with Appendix 7-2 and Appendix 7-3 providing more detail.

3.10 Land, Soils and Geology

3.10.1 Karst Features

Concerns have been raised in relation to underlying limestone geology and potential karst features associated with the Site. Several submissions attribute the bedrock geology presenting as a risk to groundwater due to its classification as a Regionally Important Aquifer – Karstified (conduit) and note the presence of swallow holes in the vicinity of the Proposed Project.

Response

As outlined in Section 8.3.5 of Chapter 8 of the EIAR, the GSI karst features database (www.gsi.ie) does not record the presence of any karst features within the Site. No karst features were recorded or bed rock encountered during the walkover surveys of the Site or any of the trial pit excavations during the intrusive site investigations.

The closest mapped karst features to the Site are a turlough and 2 no. swallow holes mapped ~2.5 km southwest of T2. Large clusters of enclosed depressions are mapped approximately 1 km north, 2.7 km east and 4.2 km west of the Site. Other than enclosed depressions, which seem to be the dominant karst feature in this area, a turlough is situated approximately 3.8 km northwest of the Site and a borehole with karst is mapped approximately 2.7 km to the west of the Site. There are no karst features associated with the Proposed Grid Connection infrastructure.

The Proposed Grid Connection is mapped to be underlain by the Ardnasillagh Formation. The western end mast associated with the Proposed Grid Connection is underlain by the Illaunagappul Formation. No infrastructure is proposed in the area mapped to be underlain by the Visean Limestones. The bedrock geology underlying the Site can be classed as being of medium importance where the bedrock could be used on a sub-economic scale. With the implementation of the prescribed mitigation measures outlined in Section 8.6.2.3 of Chapter 8 of the EIAR, the residual effect will be a negative, imperceptible, direct, short-term, unlikely effect on soils, subsoils and bedrock.

Concerns regarding groundwater quality are addressed further in Section 3.11.1 of this response below.

3.10.2 Peat Stability

Concerns were raised relating to peat stability and the risk of peat failure as a result of the Proposed Project construction and operation, as well as questions on the methodology and coverage.

Response

Peat stability of the Proposed Project, including all elements of the Proposed Grid Connection, are assessed in Chapter 8 Land, Soils, Geology of the EIAR. Section 8.2.2 summarises the site investigations carried out to inform the final layout of the Proposed Project. The findings were also used to inform the Geotechnical & Peat Stability Assessment Report (GPSA, FT, 2026) and the Peat and Spoil Management Plan (PSMP, FT, 2026) which are included as Appendix 8-1 and Appendix 4-3 of the EIAR respectively.

The GPSA (FT, 2026) has been undertaken, taking into account peat failures that have occurred on peatland sites (such as recent failures at Shass Mountain 2020, Co. Leitrim and Meenbog 2020, Co. Donegal). The lessons learned from both peat slide events have been incorporated into the design of the

Proposed Project and the construction methodologies to be implemented. The findings of the GPSA (FT, 2026), which involved analysis of 262 no. locations, showed that all Proposed Project infrastructure elements are located in areas of negligible risk. Notwithstanding the above, the management of peat stability and appropriate construction practices will be inherent in the construction phase of the Proposed Project to ensure peat failures do not occur on site (Section 8.6.2.8 of the EIAR).

The proposed onsite 110kV substation and associated temporary construction have recorded peat depths less than 1.0 meter. The results of the geotechnical peat stability assessment, outlined in Appendix 8-1 and summarised in Section 8.3.10.5 of Chapter 8 of the EIAR, concludes that the Proposed Grid Connection as well as the Site as a whole has an acceptable margin of safety and is suitable for the Proposed Project and is considered to be at low risk of peat failure. Following the risk assessment outlined in Section 16.4 of Chapter 16 of the EIAR, the risk of a major accident and/or disaster during the construction of the Proposed Project is considered 'low' in accordance with the '*Guide to Risk Assessment in Major Emergency Management*' (DoEHLG, 2010).

In the absence of mitigation measures, there will be no potential for significant effects on peat and subsoils at the Site. With the implementation of the control measures outlined above the residual effect will be a negative, imperceptible, direct, permanent, unlikely effect on peat and subsoils.

3.11 Water

3.11.1 Groundwater Contamination

Concerns were raised regarding the potential for ground disturbance during construction to affect groundwater and private water sources, with groundwater pollution and protection as a material concern. The presence of a regionally important karstified conduit aquifer and high/extreme groundwater vulnerability is also raised as a concern for contamination risk.

Response

The site investigations and walkover surveys outlined in Chapter 9 of the EIAR indicate that there are low groundwater recharge rates at the Site, with the local soils/subsoils providing protection to the underlying regional groundwater system. Therefore, surface water bodies such as drains and streams/rivers are more vulnerable to contamination from human activities than groundwater across much of the Site (see Section 3.11.2 below for further detail on surface water quality), although localised areas may have higher rates of groundwater recharge. Therefore, the hydrogeological regime at the Site is characterised by high rates of surface water runoff and low rates of groundwater recharge.

The impact assessment presented in Section 9.5.2.10 of Chapter 9 of the EIAR takes a conservative approach and assumes that all local dwellings have a groundwater well supply, and concludes due to large topographic elevation and hydrogeology of the Site the potential for water level drawdown effects at receptor locations is considered negligible.

Due to the on-site location and shallow nature of the proposed works for the Proposed Grid Connection underground cabling route, no effects on private groundwater well supplies will occur. As stated in Section 9.5.2.4 in Chapter 9 of the EIAR no groundwater level effects are predicted from the construction of any component of the Proposed Project, including the Proposed Grid Connection, due to the shallow nature of the excavation.

Due to the GSI mapped Regionally Important Karst Aquifer which underlies the Site, Group Water Schemes (GWS) are considered in Section 9.5.2.11 of the EIAR, however it should be noted that the Site does not overlap with the delineated source protection area of any GWS. It is concluded that no significant effects will occur on local group water supplies.

Section 9.5.2.10 of Chapter 9 of the EIAR notes that the biggest risk to groundwater wells will be from groundwater contamination due to the accidental release of hydrocarbons and cement-based products as a result of construction activities within the Site. To ensure the Proposed Project is carried out in line with best-practice measures, mitigation proposals for the protection of groundwater quantity and quality have been detailed in Section 9.5.2.4 (groundwater levels), Section 9.5.2.5 (hydrocarbons), Section 9.5.2.6 (cement-based products) and Section 9.5.2.7 (wastewater).

Additionally, a Construction and Environmental Management Plan (CEMP) is included as Appendix 4-3 of the EIAR which outlines all measures which will be adhered to and delivered during site construction and operation of the Proposed Project. Should the Proposed Project secure planning permission, the CEMP will be updated, in line with all conditions and obligations which apply to any grant of permission.

3.11.2 Surface Water Quality

Concerns were raised regarding the potential for effects on water receptors and quality as a result of the Proposed Project, including degradation of drinking water sources via surface water pathways and existing drainage. Observations are also made on alterations to natural drainage and cumulative effects on hydrological receptors.

Response

The construction of the Proposed Grid Connection works have the potential to impact on surface water quality. The design of the drainage management details are outlined in Sections 9.4.1 and 9.4.2 of Chapter 9 of the EIAR. As outlined above in Section 3.11.1, the CEMP (Appendix 4-3 of the EIAR) will be adhered to and delivered during site construction and operation of the Proposed Project, and outlines site drainage principles, construction methodologies and mitigation measures to be put in place to ensure there is no contamination of water sources as a result of the Proposed Project.

Due to the predominance of peat and low permeability till across the Site, water will generally leave the Site as surface water, rather than as groundwater flows, and will enter the River Robe and the Meander River downstream of the Site, with discharge into Lough Mask. Mitigation measures relating to the protection of surface water drainage regimes and surface water quality within the Site have been detailed in Section 9.5.2.1 (tree felling), Section 9.5.2.2 and 9.5.2.3 (suspended solids), Section 9.5.2.5 (hydrocarbons), Section 9.5.2.6 (cement-based products), Section 9.5.2.7 (wastewater) and Section 9.5.2.8 (morphological changes) in Chapter 9 of the EIAR. A Surface Water Management Plan (Appendix 4-7 of the EIAR) compiles the proposed surface water drainage control and treatment measures, set out in the Chapter 4 and Chapter 9 of the EIAR, and the proposed surface water monitoring programme, in a single document. With the implementation of the measures outlined above, there will be no significant effects on surface water or drinking supplies.

There will be no discharge of untreated or unattenuated water to the existing hydrological features via existing forestry drains, agricultural drains or natural watercourses which includes silt, peatland runoff and construction pollution. Detailed drainage plan showing the layout of the proposed drainage design elements is shown in Appendix 4-4 of the EIAR. Furthermore, no crossings of natural watercourses are required within the Site as part of the Proposed Grid Connection or the Proposed Project. A full assessment of the potential effects of the operational phase of the Proposed Project on the status of the receiving water bodies is included in WFD Compliance Assessment Report (Appendix 9-4 of the EIAR).

A cumulative hydrological and hydrogeological assessment of the Proposed Project with and other developments (existing and/or proposed), plans and land uses is presented in Section 9.5.7 of Chapter 9 of the EIAR. No significant cumulative effects are identified in combination with other turbary peat cutting, agriculture, forestry or other proposed developments within the hydrological cumulative study area.

3.11.3 Flooding Risk

Submissions raise concerns for increased surface runoff and potential flood risk affecting neighbouring and downstream lands as a result of the Proposed Project. References are made to recent past flooding events and consider potential future under changing climate scenarios.

Response

A Flood Risk Assessment (FRA) was undertaken for the Proposed Project and is included as Appendix 9-1 of the EIAR and is summarised in Section 9.3.7 of Chapter 9 of the EIAR. The FRA concludes that the Site is considered to be at low risk of flooding and the Proposed Project is considered to be appropriate from a flood risk perspective. The risk of contributing to downstream flooding is also very low.

Potential effects from the replacement of natural surfaces with lower permeability surfaces are assessed in Chapter 9 Section 9.5.3.1. In the absence of mitigation measures, there will be no potential for significant effects on local surface water quantity due to the small permanent footprint of the Proposed Project (5.5ha inclusive of the Proposed Wind Farm and Proposed Grid Connection) with respect to the total Site area (165ha) and the baseline hydrological condition which is characterised by high rates of surface water runoff rates and restricted groundwater recharge The proposed onsite 110kV substation footprint (approximately 12,405m^2) also represents less than 1% of the total Site area. The runoff during the operational phase, in the absence of drainage controls, represents only a 0.15% increase in runoff in comparison to the baseline runoff rates across the Site. There are no potential flooding risks associated with the Proposed Grid Connection underground cabling route.

Notwithstanding the above, the drainage system has been designed to prevent any increase in discharge rates above that which already exist within the Site, with temporary storage within the drainage channels by creating stone dams within them at regular intervals. The dams also reduce the flow rate through the drainage system and are an effective means of providing flow control. Silt fence also provide storage and flow control. The proposed integration of the Site drainage with the existing drainage is a key component of the proposed drainage management within the Site. There will be no alteration of the catchment size contributing to each of the main downstream watercourses. All Site drainage water captured within individual site sub-catchments will be attenuated and released within the same sub-catchments that it was captured. Proven and effective measures to attenuate runoff and mitigate the risk of flooding will be employed as part of the operational phase drainage system (i.e. interceptor drains, swales, check dams, settlement ponds). The residual effect will be a neutral, imperceptible indirect, long term, likely effect on down gradient streams/rivers. Please see Section 9.5.3.1 of Chapter of the EIAR for further details

As outlined in Section 6.5.2 of the Natura Impact Statement (NIS) and Section 9.5.2.2 of Chapter 9 of the EIAR, projected effects of climate change on rainfall are modelled towards the end of the life cycle of the Proposed Project, as the turbines have a life span of 35 years. It is likely that the long-term effects of climate change on rainfall patterns will not be observed during the lifetime of the Proposed Project. Drainage management measures such as settlement ponds are accordingly designed for 1 in 10 years flows with built in redundancy (+20%) to account for climate change effects on rainfall. Please see Section 9.5.2.2 of Chapter 9 of the EIAR for further details.

3.12 Climate

A number of third-party submissions raised concerns centred on the climatic impacts of the Proposed Project in relation to carbon calculations and carbon payback calculations, as well as over-reliance on climate policy and legislation which overlooks negative impacts of the Proposed Project. Submissions also point to Mayo exceeding quotas for renewable energy.

Response

Chapter 11: Climate of the EIAR identifies, describes, and assesses the potential direct and indirect effects on climate arising from the construction, operation and decommissioning of the Proposed Project and has been completed in accordance with the EIA guidance and legislation set out in Chapter 1: Introduction. The objective of this assessment is to assess the potential effects that the Proposed Project may have on Climate and sets out proposed mitigation measures to avoid, reduce or offset any potential significant effects that are identified.

As mentioned above, the carbon balance of wind farm developments in peatland habitats has attracted significant attention in recent years. When developments such as wind farms are proposed for peatland areas, there will be direct impacts and loss of peat in the area of the development footprint. There may also be indirect impacts where it is necessary to install drainage in certain areas to facilitate construction, or from the reinstatement of extracted peat. The works can either directly or indirectly allow the peat to dry out, locally, which permits the full decomposition of the stored organic material with the associated release of the stored carbon as CO2. It is essential therefore that any wind farm development in a peatland area saves more CO2 than is released. To assess the carbon losses and carbon savings, Section 11.4.3 of Chapter 11 states the Scottish Government's online carbon calculator was used for the purposes of this assessment. The potential for losses and savings takes into account peat removal and reinstatement, drainage, habitat improvement, felling and site restoration.

Section 11.4.3.2 of Chapter 11 in the EIAR, outlines the projected reduction in carbon dioxide emissions as a result of the Proposed Wind Farm generating electricity and offsetting the fossil fuels sources that would've been required to generate electricity in the absence of the Proposed Wind Farm.

As stated in Section 11.5.3.1 of Chapter 11 in the EIAR, there will be a Long-term moderate positive effect on Climate as a result of reduced greenhouse gas emissions.

In relation to climate policy and legislation, an overview of legislation and climate policy pertaining to renewable energy is provided in Chapter 2 of the EIAR and the planning report. Section 1.5 of Chapter 1 of this EIAR the details the need for the Proposed Project which is being brought forward in response to policy objectives that support Ireland's transition to a low-carbon economy, require compliance with specific climate change targets and aim to reduce Ireland's dependence on imported fossil fuels for electricity production by developing indigenous renewable energy generation such as wind energy. It is noted throughout the EIAR that the Proposed Project, and wind farm development in general, is supported by climate policy and legislation. Despite this, a thorough and robust environmental and ecological assessment of any proposed wind farm must be carried out through an EIA to ascertain that the Proposed Project will not result in any significant negative impacts. This approach has been taken for the Proposed Project, with an EIAR being prepared which is in accordance with Directive 2011/92/EU as amended by 2014/52/EU.

In relation to submissions referencing wind farms already in operation in County Mayo, with County Mayo exceeding quotas for renewable energy, it should be noted that the Proposed Project supports both national and European renewable energy targets as detailed in Section 2.3 of Chapter 2. The Renewable Energy Directive ('RED') is the EU legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Of the 27 EU member states, the lowest proportions of renewable energy generation was recorded in Ireland (13.1%).

3.13 Noise and Vibration

Concerns are raised in relation to potential noise and vibration effects of the Proposed Project on noise sensitive locations. Submissions were also raised on residential amenity and noise impacts affecting human health.

3.13.1 Substation Noise

A number of submissions have raised concerns over substation noise, tonal effects and a 'hum' caused by the proposed 110kV Substation. This has been addressed in Section 3.7.4 above. A number of submissions have raised concerns regarding noise emissions arising from elements of the Proposed Wind Farm, such as the borrow pit and turbine locations and the Proposed BESS. These elements are not part of the Proposed Grid Connection planning application and as such have not been considered further in this response to submissions. Submissions have also expressed concerns over cumulative assessment not adequately considering effects of the proposed grid connection, wind farm and BESS elements. This has been addressed in Section 3 above.

3.13.2 Noise Monitoring Locations

One submission has raised concerns over the choice of noise monitoring locations and considers them to be inadequate, noting that Location B is located beside an active woodworking factory which inflates the baseline noise conditions.

Response

As identified in Section 12.4.2.1, the noise monitoring locations were identified by preparing a preliminary noise model contour at an early stage of the assessment. Any NSLs that fell inside the predicted 35 dB L_{A90} noise contour was considered for noise monitoring in line with current best practice guidance outlined in the IOA GPG. The selection of the noise monitoring locations (NMLs) was informed by a site visit and supplemented by reviewing aerial images of the study area and other online sources of information (e.g., Google Earth and OSI Maps). The locations selected are considered appropriate for the assessment, with the noise assessment being informed by best practise guidance and legislation as outlined in Section 12.3 of Chapter 12 of the EIAR.

Regarding noise monitoring Location B, this location is considered appropriate to provide baseline noise conditions for this area, with Table 12-10 of Chapter 12 of the EIAR providing the derived baseline noise levels at various wind speeds for each noise monitoring location.

3.13.3 Human Health

A number of submissions expressed concerns over wind farm related noise effects affecting human health. This has largely been addressed in Section 3.7.5 above. Furthermore, Section 12.3.2.5.8 and 12.3.2.5.9 of Chapter 12 of the EIAR discuss noise related noise effects from wind farms based on scientific research and best practise guidance.

3.13.4 Cumulative Noise Effects

A number of submissions have expressed concerns over cumulative assessment of noise in relation to wind turbine, grid connection and BESS elements. Section 12.9 of Chapter 12 addresses cumulative effects, with Section 3 above addressing this furthermore.

3.14 Landscape and Visual

Concerns have been raised regarding the potential landscape and visual impacts of the Proposed Grid Connection, including effects on rural landscape character, residential visual amenity, designated scenic views, cultural heritage settings, cumulative impacts with other developments, and compliance with landscape protection policies.

Response

Impact on Rural Landscape Character and Visual Amenity

The potential effects of the Proposed Grid Connection on rural landscape character and residential visual amenity are assessed in Chapter 13, Landscape and Visual, of the EIAR. Section 13.7.5.4 acknowledges that the proposed 110kV substation and associated infrastructure will introduce visually prominent elements into the existing agricultural landscape. The substation is situated within an area partially enclosed by existing vegetation, with the nearest residential receptor located approximately 300m to the west.

Woodland, treeline and hedgerow planting and enhancement are proposed along the western and north-eastern boundaries of the substation to provide additional visual screening, as illustrated in Figure 13-21 and Plate 13-29. While the assessment acknowledges that the substation will remain visible from certain nearby properties, particularly to the west, its visual effects are assessed as highly localised, Long-term, Negative and Slight, and are not considered significant.

Furthermore, Appendix 13-2 concludes that physical changes to the surrounding landscape character will be confined to a localised area, with a Slight residual landscape effect. The proposed underground cabling will also limit the extent of additional above-ground electrical infrastructure.

Cumulative Landscape and Visual Impacts

Chapter 13, Landscape and Visual, of the EIAR assesses cumulative landscape and visual effects, with Section 13.6 considering the Proposed Project alongside existing wind energy developments within a 20km study area. Five existing wind farms comprising 27 turbines were identified between 7.3km and 10.8km from the nearest proposed turbine, with no permitted or proposed wind farms identified at the time of assessment.

The assessment incorporates ZTV mapping, site surveys and photomontages to evaluate cumulative visibility, including effects on residential receptors. Cumulative visual effects are primarily confined to occasional elevated viewpoints, with intervening vegetation, drumlin topography and separation distances limiting visibility across the wider landscape. The use of existing vegetation and proposed woodland, treeline and hedgerow planting have been utilised as measures to reduce the visual prominence of the 110kV substation. The assessment concludes that its visual effects will be highly localised, Long-term, Negative and Slight, and are not considered significant. Visual effects associated with the proposed end masts are similarly assessed as localised, Long-term, Negative and Not Significant.

Adequacy of Landscape and Visual Impact Assessment

The Landscape and Visual Impact Assessment (LVIA) presented in Chapter 13 of the EIAR was informed by site surveys, receptor mapping and verified photomontages, with the methodology detailed in Appendix 13-1. Section 1.6.1 confirms that representative viewpoints were selected across varying distances, direction and elevations, considering residential properties, settlements and designated scenic views. Section 1.6.2 outlines the photographic methodology, including the use of a 50mm focal length lens, GNSS GPS positioning and topographical modelling to accurately represent the proposed turbines.

Appendix 13-3 includes VP07 Knockroe, which considers nearby residential receptors assigned High visual sensitivity. The LVIA also considers residential receptors in Cloonbaul and Knockaunakill in its assessment of the Proposed Grid Connection.

While the verified photomontages focus on the proposed turbines and meteorological mast, Section 13.7.5.4 separately assesses the proposed 110kV substation and associated infrastructure. Figure 13-21 and Plate 13-29 illustrate the substation's location relative to nearby residences, existing vegetation and proposed woodland, treeline and hedgerow planting.

The assessment acknowledges that the substation will remain visible from certain nearby properties but concludes that its visual effects will be highly localised, Long-term, Negative and Slight, and are not considered significant. The proposed end masts are similarly assessed as having localised, Long-term, Negative and Not Significant visual effects.

Compliance with Mayo County Development Plan Landscape Policies

Chapter 13, Landscape and Visual, of the EIAR assesses the Proposed Grid Connection against the landscape protection policies of the Mayo County Development Plan (MCDP). Section 13.4 identifies the Site as being located within Landscape Policy Area 4 Drumlins and Inland Lowlands, which has the lowest sensitivity classification for wind farm development in County Mayo. The assessment considers Policies 22, 23 and 24 of the Landscape Appraisal of County Mayo and Objectives NEO 25 and NEO 27 of the MCDP. Table 13-2 confirms that no designated Vulnerable Features, Scenic Routes or Designated Scenic Routes with Views are located within the Site.

Section 13.7.4.2.3 assesses the visual effects on Mayo Abbey Cemetery and Church Ruins through viewpoints VP08 and VP09. The assessment concludes that the residual visual effects will be Long-term, Negative and Slight, and are not considered significant.

Section 13.7.5.4 separately assesses the proposed 110kV substation, concluding that its visual effects will be highly localised, Long-term, Negative and Slight, and are not considered significant.

3.15 Archaeological, Architectural and Cultural Heritage

Concerns have been raised over archaeological features within the Site and surrounding area, including Mayo Abbey and MA101-106, that may be impacted by the Proposed Project. Concerns have also been raised regarding the proposed damage to the hedgerow, which would result in a loss of local heritage and the area's rural character."

Response

Section 14.4 of Chapter 14 of the EIAR has assessed the likely impacts to archaeological, architectural and cultural heritage sites, including indirect visual impacts. The assessment followed the methodology outlined in Section 14.2. Following this methodology the sensitivity of each receptor was determined, the nature of the impact was determined (e.g. direct, indirect) and the magnitude of the impact was determined. The combination of the sensitivity of the receptor and the magnitude of the impact leads to an assessment of the potential significance of effect. Determining the magnitude of indirect effects involved the utilisation of Zone of Theoretical Visibility mapping, photomontages and photowires, where available.

The operational effects on cultural heritage site are outlined in Appendix 14-2. Chapter 13 details the Landscape and Visual effects, the assessment of which is in accordance with the methodology outlined in that chapter.

The Mayo Abbey ecclesiastical complex consists of several recorded monuments (MA090-100001 – 11), which were considered in Chapter 14 of the EIAR as AH71. Additionally, AH71 includes several monuments (MA090-099001 - 4) to the southwest of the Site which represent the sites of buildings, possibly related to the Mayo Abbey monastic foundation. AH71 has been assessed as having a High sensitivity, due to being included in the Record of Monuments and Places.

A number of submissions have raised concerns over an archaeological site within the Site, MA101-106. This has been assessed in the EIAR as Cultural Heritage (CH) Site No. 10 in Section 14.4.3.2.1. as noted within the assessment, the site is considered to be a receptor of low sensitivity. Mitigation is proposed for the site, as detailed in Section 14.4.3.2.3 of Chapter 14, which will consist of a pre-construction survey

resulting in the compilation of a detailed photographic and written record. This will be carried out by a suitably qualified archaeologist. Following the implementation of mitigation measures, there will be no significant residual effects.

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

Chapter 14 notes that hedgerows often represent townland boundaries. Although not usually recorded as archaeological monuments in their own right, townland boundaries are important as cultural heritage features. Section 14.3.12 provides the baseline on townland boundaries present within the Site, noting that the townland boundary of Cloonbaul/ Cunlaghfadda is marked by hedgerow to the west of an existing track (TB1). A proposed access track will pass through the hedgerow and bank to the west of the existing track. This is further assessed in Section 14.4.3 of Chater 14. Ground disturbance associated may have a direct, negative, permanent effect on TB1. This would represent a medium magnitude of impact, as the majority of TB1 will be unaffected. No significant effects are noted.

The Department of Housing, Local Government and Heritage has reviewed the EIAR and advises that the following, as contained in the DAU consultation response, should be included as a condition of any grant of permission:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 14 of the EIAR (date 14 May 2026) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in all greenfield areas of the development site and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the Department of Housing, Local Government and Heritage in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works.
    a. The report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in-situ, preservation by record (archaeological excavation) and/or monitoring may be required.
    b. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the Department of Housing, Local Government and Heritage, shall be complied with by the developer.
    c. No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority.
3. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 14 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.
4. The planning authority and the Department of Housing, Local Government and Heritage shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

3.16 Traffic and Transport

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

Response

A traffic and transport impact assessment has been included in Section 15.1 of Chapter 15 of the EIAR which concludes no significant negative effects on the local road users as a result of the Proposed Grid Connection. As outlined in Chapter 15 of the EIAR, roads condition surveys pre-construction surveys will be completed in accordance with TII recommendations and requirements of Mayo County Council Roads Department. A pre-condition survey of roads and bridges associated with the Proposed Project will be carried out prior to construction commencement to record the condition of the roads. A post construction survey will be carried out after works are completed. Where required the extent and timing of these surveys will be agreed with the local authority, as set out in the Traffic Management Measures, included set out in Section 15.1.12.5 of Chapter 15 of the EIAR. A traffic management plan will be in place for the duration of construction works for the Proposed Project, as detailed in Appendix 15-2 of the EIAR. All road surfaces and boundaries will be re-instated to pre-development condition, as agreed with the local authority engineers. All works will be done in accordance with the Guidelines for the Opening, Backfilling and Reinstatement of Openings in Public Roads, DTToS, September 2015 which is common practice for similar renewable energy developments.

3.17 Major Accidents and Natural Disasters

Observations have raised concern regarding major accidents and natural disasters which have the potential to occur as a result of the construction, operation and decommissioning of the 110kV Substation proposed as part of the Proposed Grid Connection.

Response

Risk of Fire relating to Electrical Infrastructure

The concerns raised by an observer regarding the history of fires in the wider area and emergency planning for the Proposed Grid Connection are addressed below.

As outlined in Section 16.4.1.9 of Chapter 16, the Proposed Project will be designed, constructed and operated in accordance with current best practice. The assessment concludes that the risk of a significant fire occurring and resulting in significant environmental effects is limited. The Proposed Project will be subject to a fire safety risk assessment to identify potential fire hazards and appropriate mitigation measures during operation. The rigorous safety checks imposed on turbines and associated infrastructure during design, construction, commissioning, and operation ensures the risks to humans are negligible.

Section 16.4.2 of Chapter 16 confirms that a Risk Management Plan (RMP) will be prepared and implemented on site to ensure an effective response to disasters or accidents. The RMP will incorporate appropriate emergency preparedness and planning measures. In addition, Section 16.3.4 confirms that an Emergency Response Plan (ERP) will be prepared prior to construction and implemented on site, detailing procedures to be followed in the event of an emergency concerning site health and safety and environmental protection.

With specific regard to the Proposed Grid Connection, Section 4.4.2.1 of Chapter 4 confirms that the construction and layout of electrical equipment within the proposed 110kV substation will be undertaken in accordance with EirGrid/ESB Networks specifications.

Section 5.5.2.2.1 of Chapter 5 of the EIAR provides the impact assessment of the Proposed Project in relation to health and safety during the construction phase, with Section 5.5.3.2.1 relating to the operational phase of the Proposed Project.

As such, based on the assessment carried out the Proposed Grid Connection is not anticipated to have any significant effects in relation to fire risk for any phase of the Proposed Grid Connection.

Site Access During Emergency

The concerns raised by observers regarding emergency services access to the Proposed Grid Connection, particularly in the event of flooding affecting the surrounding local road network, are acknowledged.

Emergency access arrangements are addressed in Appendix 15-2, Traffic Management Plan, of the EIAR. Section 6 of Appendix 15-2 confirms that emergency access routes shall be provided at all times during construction to facilitate emergency service vehicles accessing the Site or bypassing construction works in the event of an emergency.

Section 16.3.1 of Chapter 16, Major Accidents and Natural Disasters, considers the potential risk of flooding associated with the Proposed Project. The assessment concludes that the flood risk associated with the Proposed Project is low, with the proposed infrastructure situated above OPW-mapped indicative flood extents. The assessment further confirms that the Proposed Project will not alter fluvial flood risk within or downstream of the Site.

As outlined in Section 16.3.4 of Chapter 16, an Emergency Response Plan (ERP) will be prepared prior to the commencement of construction and implemented on Site. This plan will establish procedures to be followed in the event of an emergency concerning site health and safety and environmental protection.

In addition, Section 16.3.2 of Chapter 16 confirms that construction activities will take account of weather forecasts and that works will be suspended during extreme weather events.

Accordingly, the EIAR provides for emergency access during construction, emergency response procedures and measures to manage risks associated with flooding and severe weather.

Road Safety Accident Emergencies

Chapter 15, Material Assets, of the EIAR assesses the traffic and transport effects associated with the Proposed Project, including the Proposed Grid Connection. Section 15.1.12 confirms that approximately 14 daily return truck trips and 8 daily return car trips are anticipated during construction of the Proposed Grid Connection. The assessment concludes that there will be no significant traffic-related effects associated with its construction.

Furthermore, Appendix 15-2, Traffic Management Plan, outlines traffic management measures to minimise disruption and manage construction traffic safely. Section 6 confirms that emergency access routes shall be maintained at all times during construction to facilitate emergency service vehicles accessing the Site or bypassing construction works in the event of an emergency.

Accordingly, road safety and emergency access considerations have been addressed through the traffic assessment and proposed traffic management measures.

Child Safety Emergency

As outlined in Section 4.4.2.1 of Chapter 4, Description of the Proposed Project, the proposed 110kV substation will be enclosed by approximately 2.6m-high steel palisade fencing, or as otherwise required by ESB Networks. Internal fencing will also be provided to segregate different areas within the substation compound.

Section 4.4.2.1 confirms that the construction and layout of electrical equipment within the proposed substation will be undertaken in accordance with EirGrid/ESB Networks specifications.

In addition, Section 4.6.1 of Chapter 4 confirms that the operational site entrance will be gated using a steel barrier or stock-proof fencing.

These measures provide for controlled access to the Site and physical segregation of the high-voltage electrical equipment within the proposed substation compound, addressing concerns regarding unauthorised access, including access by children.

Emergency Contamination and Spills

Section 16.4.1.8 of Chapter 16 identifies the potential for contamination arising from the accidental release of hydrocarbons during construction and decommissioning. The assessment concludes that contamination is very unlikely to occur and would have limited consequences, representing a low-risk scenario.

Section 4.4.2.3 of Chapter 4 Description of the Proposed Project confirms that the temporary construction compound associated with the proposed 110kV substation will incorporate a bunded refuelling and containment area for the storage of lubricants and oils, together with a full retention oil interceptor.

Section 16.3.4 of Chapter 16 confirms that the Construction and Environmental Management Plan (CEMP) provides pollution prevention measures for the management of hazardous materials and includes emergency response procedures to be implemented in the event of contamination or other environmental emergencies. As outlined in Section 4.4.2.3 of Chapter 4, these include designated bunded storage and refuelling areas for oils and lubricants, together with a full retention oil interceptor within the temporary construction compound. Section 16.3.4 of Chapter 16 further confirms that the CEMP incorporates pollution prevention measures for the management of hazardous materials, alongside emergency response procedures in the event of contamination. Regular environmental inspections and auditing will also be undertaken during construction to ensure the effective implementation of the proposed mitigation measures.

Peat Stability Emergency

As outlined in Section 8.3.10 of Chapter 8, a Geotechnical and Peat Stability Assessment (GPSA) was undertaken by Fehily Timoney, incorporating detailed site investigations and peat stability analysis across 262 locations within the Site. The assessment considered both drained and undrained conditions and informed the design and location of the proposed infrastructure.

With specific regard to the Proposed Grid Connection, Table 8-6 of Chapter 8 identifies peat depths ranging from 0 to 0.9m at the proposed 110kV substation, with an average depth of 0.29m. Furthermore, Section 8.3.10.7 concludes that the Site has an acceptable margin of safety, is suitable for the Proposed Project and is considered to be at low risk of peat failure.

Section 8.6.2.8 of Chapter 8 identifies a range of mitigation measures to manage peat stability risks during construction, including the appointment of experienced contractors, supervision by qualified personnel, implementation of appropriate drainage measures, avoidance of unsupported excavations and the establishment of safety buffers around areas of deep peat.

Accordingly, the potential for peat instability has been assessed within the EIAR, and appropriate design and construction mitigation measures have been identified to minimise the risk of peat failure associated with the Proposed Grid Connection.

4. CONCLUSION

This Response to Submissions document has been prepared to address the submission and observations made in respect of live SID planning application in relation to the Proposed Development that will consist of a 110kV onsite electrical substation, loop-in grid connection, and associated infrastructure and works, located in Co. Mayo (ACP Case Reference 324429).

It is reiterated here that a robust EIAR, NIS and Planning Report were completed and accompany the SID planning application for the Proposed Development, and this is demonstrated by the fact that detail from the SID planning application documentation has been reproduced and/or referenced in this document in order to respond to the submissions and observations made. The information contained within this document is confined to the issues raised in the submissions and observations received by the Commission, and no additional or supplementary reports are included. As such, there is no additional information provided that would be considered 'significant' or 'material' in the meaning of the legislation in place.

The information provided in this Response to Submissions document constitutes a full and robust response to the matters raised in the submissions and observations, and we trust that this allows the Commission to progress with their assessment of the Proposed Development.

APPENDIX 1

RENEWABLE ENERGY STRATEGY FOR COUNTY MAYO (ADOPTED 13 JULY 2026) POLICY ASSESSMENT TABLES

Table A: Mayo RES 2026 Policy Compliance Summary Table

Policy/ Objective	Compliance
To facilitate a consistent approach to renewable energy and to maximise the opportunities for renewable energy development whilst safeguarding the environment and existing residential amenities.	The Proposed Development forms part of a renewable energy development, which will generate and provide c. 31.5 MW of sustainable wind energy to the national electricity grid. The findings of the EIAR and the mitigation measures set out within the documents demonstrate the Proposed Development will be capable of being constructed, operated and decommissioned without likely significant effects on the environment generally. Provided that the Proposed Project is constructed, operated and decommissioned in accordance with the design, best practice and mitigation that is described within this EIAR, the Proposed Project will not result in any significant effects on human beings in the area surrounding the Proposed Project. Please refer to **Chapter 5** of the EIAR for further details.
To safeguard, where appropriate, areas with potential for renewable energy projects and to guide renewable energy development to preferred locations. Consider new wind energy developments in Co. Mayo in the areas identified as open for consideration. All wind energy proposals will be subject to normal planning considerations and compliance with the policies and objectives outlined in the Mayo County Development Plan 2022-2028 in general.	**Table 7-2** and **Table 7-3** of the Planning Report demonstrate that the Proposed Development is in compliance with the policies and objectives of the MCDP (as varied) and the Development Management Standards of the MCDP (as varied) respectively. The Proposed Development which forms part of a wind energy development is located within the southern part of the County which is identified in the Mayo RES 2026 as generally being one of the preferred locations for renewable wind energy development. As shown in **Figure 1-1** in the Response to Submissions Document, the southern part of the County, including the Proposed Development site, is mainly identified as 'Open for Consideration', with small pockets of interspersing lands identified as 'Unsuitable' arising from specific landscape, ecological, recreational and/or cultural and built heritage constraints. › The layout of the Proposed Project has been informed by a detailed constraints mapping exercise undertaken in accordance with the Wind Energy Development Guidelines published by the then Department of Environment, Heritage and Local Government (DoEHLG) in June 2006 ('the Guidelines'), the draft Revised Wind Energy Development Guidelines published by the then Department of Housing, Planning and Local Government (DoHPLG) in December 2019 ('the Draft Guidelines') and the 'Best Practice Guidelines for

Policy/ Objective	Compliance
	the Irish Wind Energy Industry' (Irish Wind Energy Association, 2012) which has been informed by multi-season site surveys and assessments. The constraints mapping exercise is detailed in **Sections 3.2.4** and **3.2.5** in **Chapter 3** (Consideration of Reasonable Alternatives) of the EIAR.
Ensure that renewable energy developments is located on/in close proximity to the national grid infrastructure. Any proposals for renewable energy development, including those availing of private wires, will be subject to compliance with the objectives and development management standards set out in the Mayo County Development Plan 2022-2028.	As detailed in **Chapter 3** of the EIAR, further to advice from Grid Technical Experts, it was deemed that the most viable option to connect the Proposed Wind Farm to the national grid would be through a loop-in connection into the existing Cloon-Castlebar 110kV overhead line which runs directly adjacent to the Proposed Wind Farm Site. The Proposed Development will connect the Proposed Wind Farm to the 110kV Castlebar to Cloon overhead line via a new 110kV onsite substation and is the subject of the SID application for approval to the Commission.
Support and facilitate the sustainable development of enhanced electricity and gas supplies, additional electricity generation capacity, and associated networks, to serve the existing and future needs of the County.	The Proposed Development will facilitate the transfer of renewable wind energy to the national electricity grid and will also stabilise the grid by transmitting the renewable energy produced by the Proposed Wind Farm at an appropriate voltage. The proposed on-site 110kV substation will form part of the national electricity grid once constructed and energised and will enhance the capacity of grid infrastructure in the County. **Table 7-2** and **Table 7-3** of the Planning Report demonstrate that the Proposed Development is in compliance with the policies and objectives of the MCDP (as varied) and the Development Management Standards of the MCDP (as varied) respectively.
Ensure that the siting of electricity power lines is managed in terms of the physical and visual impact on the natural and built environment, the conservation value of Natura 2000 sites and especially in sensitive landscape areas. Consideration will be given to the undergrounding or alternative routes in the siting of powerlines in both visually and environmentally sensitive area.	The Proposed Development forms part of a renewable energy development, which will generate and provide c. 31.5 MW of sustainable wind energy to the national electricity grid. The findings of the EIAR and the mitigation measures set out within the SID planning application documents demonstrate the Proposed Development will be capable of being constructed, operated and decommissioned without likely significant effects on the environment generally. Please refer to the EIAR for further details.

Policy/ Objective	Compliance
	Chapter 13 of the EIAR assesses the likely significant landscape and visual impacts arising as a result of the Proposed Project. **Chapter 13** also assesses the proposed onsite 110kV substation that forms part of the Proposed Development. Cumulative visual effects have greatest potential to arise with other existing developments. However, given the setting of the Proposed Project and limited visibility with the extensive flat landscape, cumulative effects are only mostly limited to elevated vantage points within the Landscape and Visual Impact Assessment ('LVIA') Study Area. The LVIA in **Chapter 13** determined that no Significant landscape and visual effects were identified. Overall, the Proposed Project is effectively accommodated within the landscape without any Significant effects on the key scenic or landscape sensitivities of receptors identified in the 20km LVIA Study Area. The Proposed Project is appropriately designed and suitably scaled, and it has been demonstrated that no significant landscape and visual effects are likely to arise. Please refer to **Chapter 13** of the EIAR for further details. The Proposed Project is not located within any European Sites or nationally designated sites. The River Moy Special Area of Conservation ('SAC'), Balla Turlough SAC and Lough Mask Special Protection Area ('SPA') have been fully assessed within the Appropriate Assessment Screening and NIS that accompanies the SID planning application. The Appropriate Assessment Screening Report ('AASR') and NIS have been prepared to provide the competent authorities with the information necessary to complete an Appropriate Assessment screening and an Appropriate Assessment for the Proposed Project in compliance with Article 6(3) of the Habitats Directive. The NIS concludes that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site. Please refer to the AASR and NIS for further details. Each of the proposed turbines and the meteorological mast (part of the Proposed Wind Farm) will be connected to the onsite 110kV electricity substation (part of the Proposed Development) via underground 20/33 kilovolt ('kV') electricity cabling. The 110kV electricity cabling from the substation to the 2 no. end masts will also be underground.

Policy/ Objective	Compliance
	Please refer to **Chapter 4** of the EIAR for further details.
Facilitate the expansion or upgrading of existing infrastructure and provision of new essential infrastructure, including roads, ports, piers, power lines and substations etc., to support the development of appropriately located Figure 5.3 Gas Network Transmission System renewable energy projects, in accordance with the requirements of the Habitats Directive and proper planning and sustainable development.	The Proposed Development will connect the Proposed Wind Farm to the 110kV Castlebar to Cloon overhead line via a new 110kV onsite substation and is the subject of the SID application for approval to the Commission. The Proposed Development will facilitate the transfer of renewable wind energy to the national electricity grid and will also stabilise the grid by transmitting the renewable energy produced by the Proposed Wind Farm at an appropriate voltage. The proposed on-site 110kV substation will form part of the national electricity grid infrastructure once constructed and energised and will enhance the capacity of grid infrastructure in the County. The AASR and NIS, which accompany the SID Planning Application has been prepared to provide the competent authorities with the information necessary to complete an Appropriate Assessment screening and an Appropriate Assessment for the Proposed Project in compliance with the Habitats Directive. The NIS concludes that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site.
Protect the integrity and authenticity of the unique unspoilt coastal landscapes, scenic routes and designated view of the County that form the essential context and backdrop for the Wild Atlantic Way which has become major tourism and economic asset for the county.	The Proposed Project is not located within or adjacent to any coastal landscapes or Wild Atlantic Way routes or discovery points. The Proposed Project is not located within or adjacent to any National Parks.
Ensure that the unique heritage & tourism assets of County Mayo, including the Wild Atlantic Way (Route & Discovery points), Mayo Dark Sky Park, Wild Nephin Ballycroy National Park, Spiritual Trails and Coastal Trails are protected from development that would negatively impact the integrity of their setting.	In relation to spiritual trails, **Chapter 13** of the EIAR considers sites such as Knock Shrine, Croagh Patrick, and Mayo Abbey Church and Ruins. These are discussed in greater detail in **Table 7-7** of the Planning Report and **Table C** of this Appendix below. Residual effects on these sites in relation to landscape and visual impacts are not considered significant. The Proposed Project is not located within or adjacent to the Céide Fields or to the Joyce Country and Western Lakes Geopark.

Policy/ Objective	Compliance
Ensure that the integrity of landscapes at the Céide Fields which holds potential as a UNESCO sites, and the landscapes of the UNESCO Joyce County and Western Geopark are safeguarded and protected from inappropriate development particularly large-scale wind energy development and related infrastructure.	The LVIA in **Chapter 13** determined that no Significant landscape and visual effects are likely. Overall, the Proposed Project is effectively accommodated within the landscape without any Significant effects on the key scenic or landscape sensitivities of receptors identified in the 20km LVIA Study Area. The Proposed Project is appropriately designed and suitably scaled, and it has been demonstrated that no significant landscape and visual effects are likely to arise. Please refer to **Chapter 13** of the EIAR for further details.
Ensure applicants/developers engaged in wind farm developments in Mayo go through a formal pre planning consultations under section 90. Of the Planning and Development Act 2024 (as amended). Such consultations will identify potential constraints, community concerns.	The Mayo RES 2026 clarifies that applicants/developers of renewable energy developments shall engage in the formal pre-planning consultations under the provisions of Section 247 of the Planning Act, or Section 90 of the Planning and Development Act 2024, as amended ('New Planning Act'), once enacted. Two pre-application consultation meetings were held with MCC under the provisions of Section 247 of the Planning Act in relation to the Proposed Development. At the time of pre-planning consultations with MCC, Section 90 of the New Planning Act had not yet been commenced. The Applicant also engaged with the Commission, then An Bord Pleanála, under the provisions of Section 182E of the Planning Act, as to whether the Proposed Development would meet the thresholds of the Seventh Schedule of the Planning Act. The Applicant opened consultations with the Commission in February 2024 in relation to the Proposed Development which comprises an onsite 110kV electrical substation which will connect into the existing Castlebar to Cloon 110kV overhead line that traverses the site, via a loop in loop out connection. An SID meeting under the provisions of Section 182E of the Planning Act was held with the Commission on the 9th of May 2024. A letter received from the Commission dated the 4th of July 2024 stated that under Section 182E, it is the opinion of the Commission that the Proposed Development falls within the scope of the Section 182A of the Planning Act. This confirmed that the Proposed Development constitutes SID and therefore the planning application should be made directly to the Commission. The ACP SID Status Confirmation is included in Addendum 4 of the SID Planning Application Form.

Policy/ Objective	Compliance
	Details of the pre-application consultation meetings are summarised in **Table 4-1** and **Table 4-2** of the Planning Report. Further detail is provided in relation to each meeting in **Section 2.7.3.1.1** and Section 2.7.3.1.2 of **Chapter 2** of the EIAR.

Table B: Mayo RES 2026 Environmental Mitigation Measures Consideration Summary Table

Environmental Mitigation Measures	Consideration
Any proposals for Renewable Energy infrastructure shall comply with Volume 2 of the Mayo County Development Plan 2022 -2028 Development Management (Section 8.8 Renewable Energy) and the overarching policies and objectives of the Mayo County Development Plan 2022-2028.	Section 8.8 Renewable Energy and Section 8.8.1 of Volume 2 of the MCDP (as varied) sets out the Development Management Standards that MCC may consider when considering applications for renewable energy developments. The Proposed Development is assessed against each of the requirements as set out in **Table 7-3** of the Planning Report included as part of the SID planning application. It is demonstrated through **Table 7-3** of the Planning Report that the Proposed Development is in compliance with the relevant Development Management Standards of the MCDP (as varied). Please refer to the Planning Report for further details.
To ensure that Renewable Energy development proposals support and enhance the connectivity and integrity of habitats in the RES area by incorporating natural features into the design of development proposals; and to work with infrastructure providers to co-develop infrastructural management plans to enhance biodiversity.	The AASR and NIS, which accompany the SID planning application for the Proposed Development, has been prepared to provide the competent authorities with the information necessary to complete an Appropriate Assessment screening and an Appropriate Assessment for the Proposed Project in compliance with the Habitats Directive. The NIS concludes that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site.
Existing good practice guidance for the protection and enhancement of biodiversity at renewable energy development site will be adhered to as part of the design of such developments. Examples of such good practice include:	**Chapter 6** of the EIAR states that the Proposed Project has been deliberately designed to minimise the effects on biodiversity by avoiding Annex I habitat and areas of high value for fauna. The Proposed Project also includes a Biodiversity Mitigation and Enhancement Plan ('BMEP') (**Appendix 6-4** of the EIAR), which proposes enhancement measures for habitats and fauna within the Site. Furthermore, no botanical species listed under the Flora (Protection) Order (S.I. No. 235 of 2022), listed in Annex II of the EU Habitats Directive (92/43/EEC), or listed in the Irish Red Data Books were recorded within the Site.

Environmental Mitigation Measures	Consideration
› Pollinator-friendly management of Wind Farms, National Biodiversity Data Centre	The BMEP included in **Appendix 6-4** of the EIAR sets out measures to enhance biodiversity within the Site. As a result, suitable habitat for the population of marsh fritillary within the Site is proposed, in addition to native woodland planting and a net gain in linear habitats. Detailed mitigations and enhancement proposals are in place to protect bats, their roosts and commuting corridors in line with the MCDP (as varied). As part of the BMEP, any hedgerows and scrub to be lost to facilitate the Proposed Project will be replaced by replanting of additional linear hedgerow and treeline habitat within the Site as well as non-linear areas of native trees/scrub such that there will be a net gain in linear habitats and native woodland habitat within the Site. **Section 6.1.3** of **Chapter 6** of the EIAR details the review of relevant guidance and sources of consultation in relation to **Chapter 6**, which assesses the likely significant effects (both alone and cumulatively with other projects) that the Proposed Project may have on Biodiversity, Flora and Fauna. **Section 7.1.2** of **Chapter 7** of the EIAR details the legislation, guidance and policy context in relation to **Chapter 7**, which assesses the likely significant impacts of the Proposed Project on avian receptors. The National Biodiversity Data Centre published guidance on Pollinator-friendly management of Wind Farms[5]. This identifies an evidence-based action plan for wind farm operators that can help pollinators by employing changes to existing management strategies. Such policies have informed the evaluation of ecological receptors recorded within the site and the ecological assessment process. Pollinator friendly measures have been incorporated into the Proposed Project and these are detailed within the BMEP (**Appendix 6-4** of the EIAR). Provided the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation measures described within this application, significant individual or cumulative effects on biodiversity are not anticipated at international, national, county or local scales on any of the identified Key Ecological Receptors.

[5] https://pollinators.ie/wp-content/uploads/2022/12/Wind-Farm-Pollinator-Guidelines-2022-WEB.pdf

Environmental Mitigation Measures	Consideration
	Please refer to the AASR, NIS, and **Chapter 6**, **Appendix 6-4** and **Chapter 7** of the EIAR for further details.
To require project planning for any Renewable Energy project to be fully informed by ecological and environmental constraints at the earliest stage of project development and any necessary assessment to be undertaken, including assessments of disturbance to species and habitats, as required. Any ecological assessment shall also be required to consider ecological connectivity and potential supporting habitats to European Sites.	The layout of the Proposed Project has been informed by a detailed constraints mapping exercise undertaken in accordance with the Guidelines, the Draft Guidelines and the 'Best Practice Guidelines for the Irish Wind Energy Industry' (Irish Wind Energy Association, 2012) and has been informed by multi-season site surveys and assessments. The constraints mapping exercise is detailed in **Sections 3.2.4** and **Section 3.2.5** in **Chapter 3** of the EIAR. As detailed in **Chapter 3** of the EIAR, further to advice from Grid Technical Experts, it was deemed that the most viable option to connect the Proposed Wind Farm to the national grid would be through a loop-in connection into the existing Cloon-Castlebar 110kV overhead line which runs directly adjacent to the Proposed Wind Farm Site. The Proposed Development will connect the Proposed Wind Farm to the 110kV Castlebar to Cloon overhead line via a new 110kV onsite substation and is the subject of the SID application for approval to the Commission. **Chapter 6** of the EIAR concludes that significant individual or cumulative effects on biodiversity are not anticipated at international, national, county or local scales on any of the identified Key Ecological Receptors, on the basis that the Proposed Project will be constructed and operated in accordance with the design, best practice and mitigation measures described within this application. Overall, it has been demonstrated throughout the EIAR and the Planning Report that the Proposed Development Site is suitable for the Proposed Development for the reasons detailed in **Section 5.2** of the Planning Report and **Section 3.2.5** of **Chapter 3** of the EIAR. **Table 7-2** and **Table 7-3** of the Planning Report demonstrate that the Proposed Development is in compliance with the policies and objectives of the MCDP (as varied) and the Development Management Standards of the MCDP (as varied) respectively. The NIS has been prepared to provide the competent authorities with the information necessary to complete an Appropriate Assessment screening and an Appropriate Assessment for the Proposed Project in compliance with the Habitats Directive. The NIS concludes that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site.

Environmental Mitigation Measures	Consideration
	Please refer to the AASR, NIS, and **Chapter 3** and **Chapter 6** of the EIAR for further details.
To require the preparation and assessment of all planning applications for Renewable Energy projects to have regard to the information, data and requirements of the Appropriate Assessment Natura Impact Report, SEA Environmental Report and Strategic Flood Risk Assessment Report of the Mayo CDP 2022- 2028 Development Plan.	The MCDP SEA Environmental Report of the MCDP recommended the insertion of Strategic County Development Plan Objective no 9 ('SO 9') into the MCDP (as varied) as a key mitigation measure. In accordance with SO 9, the Proposed Project has been fully informed by ecological and environmental constraints data as summarised in **Section 3.2.4** (Constraints and Facilitators Mapping) in **Chapter 3** of the EIAR. In accordance with SO 9, the NIS provides a comprehensive assessment of Habitat IV species protected under the Habitats Directive (92/43/EEC). The EIAR and NIS which accompany the SID planning application comprehensively assess potential impacts of the Proposed Project on biodiversity, flora and fauna, population and human health, soil, water, air and climatic factors, material assets, cultural heritage, and landscape and set out appropriate mitigation measures where required. The Proposed Project is not located within any European Sites or nationally designated sites. The River Moy SAC, Balla Turlough SAC and Lough Mask SPA have been fully assessed within the Appropriate Assessment Screening and NIS that accompanies the SID planning application. The NIS concludes that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site. A cumulative assessment was undertaken to consider the potential for the Proposed Project to interact with other plans and projects in the surrounding area, including other wind farms and large-scale developments. Following this assessment, no significant cumulative effects on biodiversity, flora or fauna have been identified. In accordance with SO 9, a Flood Risk Assessment (FRA) has been prepared for the Proposed Project. The FRA is included in **Appendix 9-1** of the EIAR and flood risk is considered in **Chapter 9** of the EIAR. The FRA concluded that the Site is located in Flood Zone C and is at low risk of flooding. The Proposed Project drainage system will ensure that all surface water runoff at the Site is attenuated and there will be no increase in the downstream flood risk as a result of the Proposed Project. Please refer to **Chapter 3**, **Chapter 9** and **Appendix 9-1** of the EIAR for further details.

Environmental Mitigation Measures	Consideration
In determining whether the plan is likely to have a significant effect on the environment, and specifically in relation to architectural heritage, the proximity to architectural conservation areas and protected structures, their curtilage/s and/or associated historic demesne/s will need to be taken into consideration. Where the extent of curtilages and/or demesnes associated with protected structures are not identified on current mapping systems, it will be necessary to consult with the local authority Architectural Conservation Officer in this regard should the need arise. It is imperative to ensure that policies and objectives relating to architectural heritage align with and support overlapping land use policies and objectives to ensure the efficient and sustainable delivery of necessary infrastructure	**Chapter 14** of the EIAR details an archaeological, architectural, and cultural heritage assessment of the Proposed Project. The assessment is based on a desktop assessment of the available cultural heritage and archaeological data and a comprehensive field inspection of the Proposed Project and turbine delivery route accommodation areas. There are no recorded buildings of architectural heritage value within the Site, however, there are 20 no. recorded structures of architectural merit within the 5km study area of the Proposed Wind Farm. None are located within the 50m study areas of the Proposed Development or Turbine Delivery Route. Additionally, 46 no. previously unrecorded sites of cultural heritage significance have been identified within the 2km study area as part of this assessment, with a further one site within the 50m study area of the Turbine Delivery Route accommodation areas. There is one protected structure within the 5km study area of the Proposed Wind Farm and none within the 50m study areas of the Proposed Development or Turbine Delivery Route accommodation areas. An assessment of the potential, indirect operational impacts on the archaeological, architectural and cultural heritage resource has been carried out in **Chapter 14** of the EIAR. Negative operational impacts ranging from imperceptible to moderate are predicted, however no significant impacts have been identified. Slight indirect negative effects have been identified to AH95 (a round tower subject to Preservation Orders and recorded as a National Monument) and AH97 (a ringfort subject to Preservation Orders). These are not significant. No indirect negative effects have been identified to AH96 (a crannog subject to Preservation Orders). An assessment of potential cumulative effects was also undertaken, taking into consideration proposed or permitted developments within 5km of the Proposed Turbines of the Proposed Wind Farm, and permitted or proposed wind farms within 20km of the Proposed Turbines of the Proposed Wind Farm. No significant negative cumulative effects have been identified. Following the implementation of the above mitigation measures, there will be no significant residual effects on the previously unrecorded archaeological resource.

Environmental Mitigation Measures	Consideration
	Please refer to **Chapter 14** of the EIAR for further details.

Table C: Mayo RES 2026 Wind Energy Constraint Consideration Summary Table

Wind Energy Constraint Theme	Wind Energy Constraint	Consideration
Site Selection and Consideration of Reasonable Alternatives	**Connection to the National Electricity Grid**	The Proposed Development will connect the Proposed Wind Farm to the national electricity grid via the 110kV Castlebar to Cloon overhead line, enabling the transfer of renewable wind energy to the national electricity grid. Alternative design options for the Proposed Development were considered in **Chapter 3** of the EIAR. The chosen Proposed Development design was considered to be the most environmentally prudent and practical option for a grid connection. Please refer to **Chapter 3** of the EIAR for further details.
	Settlements	Settlements and sensitive receptors are considered in **Chapter 3** of the EIAR. The Applicant sought to identify an area with a relatively low population density. Having reviewed the settlement patterns in the vicinity, the study area emerged as suitable to accommodate the Proposed Project. The population density of the Population Study Area in 2022 as described in **Chapter 5** of the EIAR is 14.87 persons per square kilometre. This is considerably lower than the national population densities of 71.47 persons per square kilometre and lower than the population density of County Mayo, recorded at 24.69 persons per square kilometre. **Chapter 5** found that the residual effects of the Proposed Project are not significant and will not lead to significant effects on any environmental media with the potential to lead to health effects for humans. Please refer to **Chapter 3** and **Chapter 5** of the EIAR for further details.
	Lakes	Lakes and watercourses were considered in the constraints mapping for the Site, as detailed in **Chapter 3** of the EIAR. Watercourses plus a 50-metre buffer and lakes plus a 100-metre buffer were considered in the constraints mapping. The potential likely effects of the Proposed Project on hydrology and hydrogeology

Wind Energy Constraint Theme	Wind Energy Constraint	Consideration
		are assessed in **Chapter 9** of the EIAR. **Chapter 9** finds that no significant effects on the water environment will occur during the construction, operation or decommissioning of the Proposed Project. Please refer to **Chapter 3** and **Chapter 9** of the EIAR for further details.
	Elevated Areas (over 500 metres)	The Site scale and typography was considered in **Chapter 3** of the EIAR. The Site is located in a rural setting, covering a total of 165 hectares. The Site description and typography of the site is discussed in **Chapter 8** of the EIAR. Ground elevations within the Site are relatively flat and low-lying, ranging from approximately 60mOD (metres above Ordnance Datum) to 70mOD. The topography slopes very gently in an easterly direction towards Drumady Lough. Please refer to **Chapter 3** and **Chapter 8** of the EIAR for further details.
Cumulative Impacts	**Cumulative Impact of Wind Energy Developments**	The cumulative impact assessments carried out in each of the impact assessment Chapters of the EIAR consider all potential significant cumulative effects arising from relevant projects and land uses within the cumulative study area. Existing land uses within the cumulative study area include ongoing agricultural and forestry practices. Overall, the Proposed Project has been designed to avoid and mitigate impacts on the environment, and a suite of mitigation measures is set out within the EIAR. The mitigation measures set out in the EIAR will ensure that significant cumulative effects do not arise during the construction, operational or decommissioning phases of the Proposed Project. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of the EIAR. Please refer to **Chapter 2** and each of the relevant sections of the relevant Chapters of the EIAR for further details.
Population and Human Health	**Economic Assets** › Tourism Assets	**Chapter 5** of the EIAR considers employment and economic activity, and tourism and amenity. In relation to economic assets, cumulative projects within 20 kilometres of the Proposed Project which may be proposed, permitted or operational/existing contribute to short-term employment during the construction stages and

Wind Energy Constraint Theme	Wind Energy Constraint	Consideration
		provide the potential for long-term employment resulting from maintenance operations. This results in a long-term slight positive effect. In relation to tourism assets, there are no key identified tourist attractions pertaining specifically to the Site. It is not considered that the Proposed Project together with other projects in the area will cumulatively affect any tourism infrastructure in the wider area. The conclusions from available research indicate there is a generally positive disposition among tourists towards wind development in Ireland. Given the Proposed Project's relative isolation and remoteness, it is considered that the Proposed Project will support the development of the wider area, attracting local and new visitors to the area which could be uncovered as part of a wider regional strategy. It is on this basis that it can be concluded that there would be a long-term imperceptible cumulative effect from the Proposed Project and other wind farm developments in the area. Please refer to **Chapter 5** of the EIAR for further details.
Biodiversity	**Nature Reserves**	The Proposed Project is not located within or adjacent to any Nature Reserves.
	National Parks › Wild Nephin National Park – Dark Skies Park	The Proposed Project is not located within or adjacent to any National Parks.
	Designated Sites › Special Areas of Conservation › Special Protection Areas › Natural Heritage Areas › Proposed National Heritage Areas	**Chapter 6** of the EIAR considers designated sites. The Proposed Project is not located within any European Sites or nationally designated sites. The River Moy SAC, Balla Turlough SAC and Lough Mask SPA have been fully assessed within the AASR and NIS that accompanies this planning application. The AASR and NIS have been prepared to provide the competent authorities with the information necessary to complete an Appropriate Assessment screening and an Appropriate Assessment for the Proposed Project in compliance with Article 6(3) of the Habitats Directive. The NIS concludes that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site.

Wind Energy Constraint Theme	Wind Energy Constraint	Consideration
		It is concluded that, provided the Proposed Project will be constructed and operated in accordance with the design, best practice and mitigation measures described within the EIAR, significant individual or cumulative effects on biodiversity are not anticipated at international, national, county or local scales on any of the identified Key Ecological Receptors. Please refer to **Chapter 6** of the EIAR and the NIS for further details.
	Ramsar Sites	Ramsar Sites are considered in **Chapter 6** of the EIAR. There are no Ramsar Sites located within the likely Zone of Influence of the Proposed Project. The nearest Ramsar Site to the Proposed Project is the Lough Corrib SAC, located over 15km to the south of the Site. No connectivity or potential pathways for significant effects on this or any other Ramsar Sites were identified. Please refer to **Chapter 6** of the EIAR for further details.
	Freshwater Pearl Mussel Catchments	The National Parks and Wildlife Service ('NPWS') *Margaritifera* Sensitive Area map (Version 10, 2020) was consulted during the desk study. The Proposed Project is located outside of any *Margaritifera* catchments or sensitive areas. There are no records of freshwater pearl mussel in any watercourses downstream of the Site. Please refer to **Chapter 6** of the EIAR for further details.
Land, Soils and Geology	**Soils and Geology**	Land, soils and geology are considered in **Chapter 3** and **Chapter 8** of the EIAR. The Proposed Project has a very small development footprint when compared to the overall area of the Site. Therefore, no significant effects on land will occur during the construction, operation or decommissioning phases of the Proposed Project. An assessment of potential cumulative effects associated with the Proposed Project and other developments on land, soils and geology has been completed in **Chapter 8**. The land, soils and geology assessment confirms

Wind Energy Constraint Theme	Wind Energy Constraint	Consideration
		that there will be no significant cumulative effects on land, soil and geology as a result of the Proposed Project. Please refer to **Chapter 3** and **Chapter 8** of the EIAR for further details.
	Landslide Susceptibility	**Chapter 8** of the EIAR considers landslide susceptibility. The Geological Survey Ireland ('GSI') Landslide database (www.gsi.ie) does not record any historic landslides in the vicinity of the Site or in the surrounding lands. The GSI Landslide Susceptibility Map (www.gsi.ie) classifies the probability of a landslide occurring at a given location. The probability of a landslide occurring at the Site is mapped as being Low. Fehily Timoney and Company ('FT') have prepared a geotechnical and peat stability assessment of the Proposed Project. A Geotechnical & Peat Stability Assessment ('GPSA') (FT, 2026) is included as **Appendix 8-1** of the EIAR. Hydrological, hydrogeological and ecological factors were also assessed in the GPSA (FT, 2026), and interaction between FT, Hydro-Environmental Services ('HES') and MKO was undertaken throughout the iterative design process. The GPSA was prepared in accordance with Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (PLHRAG, Scottish Government, 2017). A constraints study was initially undertaken by the Environmental (MKO), Hydrological (HES) and Ecological (MKO) members of the project design team to determine the developable area at the Site, prior to the site reconnaissance by engineering geologists/geotechnical engineers from FT. A comprehensive GPSA (FT,2026) has been undertaken for all key infrastructure locations, and it concludes that with the implementation of the proposed control (mitigation) measures the residual effect of a landslide occurring is determined to be imperceptible. Refer to **Appendix 8-1** of the EIAR for the detailed GPSA (FT, 2026) and **Chapter 16** of the EIAR for a full assessment on risks relating to the Proposed Project. Please refer to **Chapter 8**, **Chapter 16** and **Appendix 8-1** of the EIAR for further details.
	Peat Soils	**Chapter 3** and **Chapter 8** of the EIAR considers peat. FT was engaged to undertake a geotechnical and peat stability assessment of the Proposed Project. A GPSA (FT, 2026) is included in **Appendix 8-1** of the EIAR.

Wind Energy Constraint Theme	Wind Energy Constraint	Consideration
		The findings of the peat stability assessment showed that the Site has an acceptable margin of safety, is suitable for the Proposed Project and is considered to be at low risk of peat failure. The findings include recommendations and control measures for construction work in peat lands to ensure that all works adhere to an acceptable standard of safety. Based on site investigations, peat is present at the Site and ranges in depth from 0 to 6.1m, with an average peat depth of 1.2m. Approximately 91% of the peat depth probes recorded peat depths of less than 3.0m. A number of localised readings recorded peat depths were between 3.5 and 6.1m. The layout of the Proposed Project was designed to avoid the areas of deepest peat. The residual risk of significant peat slide/failure occurring is determined to be negligible to low following the implementation of the proposed control (mitigation) measures. Please refer to **Chapter 8** and **Appendix 8-1** of the EIAR for further details.
	Geological Heritage Sites	**Chapter 8** of the EIAR considers geological heritage sites. There are no recorded geological heritage sites within the Site or in the surrounding lands. The closest mapped geological heritage site is the Knock – Ballyhaunis Area County Geological Site ('CGS') located more than 10 km to the northeast of the Site. All geological heritage sites have been screened out of the impact assessment due to their distal location from the Proposed Project. There is no potential for effects to occur in terms of land, soils and geology characteristics of any geological heritage site. Please refer to **Chapter 8** of the EIAR for further details.
	Karst Landforms	Karst features are considered in **Chapter 8** of the EIAR. The GSI karst features database (www.gsi.ie) does not record the presence of any karst features within the Site. The closest mapped karst features are a turlough and 2 no. swallow holes mapped ~2.5 km southwest of T2 of the Proposed Wind Farm. Although, the GSI have recorded numerous karstic features in the wider area. Large clusters of enclosed depressions are

Wind Energy Constraint Theme	Wind Energy Constraint	Consideration
		mapped approximately 1 km to the north, approximately 2.7 km to the east and approximately 4.2 km west of the Site. Other than enclosed depressions, which seem to be the dominant karst feature in this area, a turlough is situated approximately 3.8 km northwest of the Site and a borehole with karst is mapped approximately 2.7 km to the west. No karst features were recorded during the walkover surveys of the Site or during the intrusive site investigations. Please refer to **Chapter 8** of the EIAR for further details.
Hydrology and Hydrogeology	**Flood Risk Areas**	Flood risk is considered in **Chapter 9** of the EIAR. A Flood Risk Assessment ('FRA') has been undertaken for the Proposed Project and is included in **Appendix 9-1** of the EIAR. The FRA concluded that the Site is located in Flood Zone C and is at low risk of flooding. The Proposed Project drainage system will ensure that all surface water runoff at the Site is attenuated and there will be no increase in the downstream flood risk as a result of the Proposed Project. Please refer to **Chapter 9** and **Appendix 9-1** of the EIAR for further details.
	Water Framework Directive Blue Dot Programme	The Water Framework Directive ('WFD') is considered in **Chapter 9** of the EIAR. A WFD Compliance Assessment has been completed for all water bodies (surface water and groundwater bodies) with the potential to be impacted by the Proposed Project and is included in **Appendix 9-4** of the EIAR. With the implementation of the mitigation measures detailed in this EIAR there will be no change in the WFD status of the underlying groundwater body or downstream surface water bodies as a result of the Proposed Project. The Proposed Project has been found to be fully compliant with the WFD and will not prevent any waterbody from achieving its WFD objectives. Please refer to **Chapter 9** and **Appendix 9-4** of the EIAR for further details.
Landscape and Visual	**Sensitive Landscape Areas** › Policy Areas 1-3	**Chapter 3** and **Chapter 13** of the EIAR consider landscape and visual.

Wind Energy Constraint Theme	Wind Energy Constraint	Consideration
	Scenic Routes and Designated Views	Overall, the LVIA in **Chapter 13** determined that no Significant landscape and visual effects were identified. Overall, the Proposed Project is effectively accommodated within the landscape without any Significant effects on the key scenic or landscape sensitivities of receptors identified in the 20km LVIA Study Area. The Proposed Project is appropriately designed and suitably scaled, and it has been demonstrated that no significant landscape and visual effects are likely to arise. Please refer to **Chapter 3** and **Chapter 13** of the EIAR for further details.
	Spiritual Trails	In relation to spiritual trails, **Chapter 13** of the EIAR considers sites such as Knock Shrine, Croagh Patrick, and Mayo Abbey Church and Ruins. Knock Shrine and Knock town were scoped out for further assessment as a visual receptor as there is no theoretical visibility of the Proposed Turbines of the Proposed Wind Farm. Croagh Patrick Heritage Trail (and its adjoining loops) is located approximately 6.2 km north-west of the nearest Proposed Turbine of the Proposed Wind Farm at its closest point. The route primarily traverses relatively low-lying landscapes enclosed by localised landforms and dense vegetation, which limits visibility towards the proposed turbines. Large sections of the trail within the LVIA Study Area experience no theoretical visibility, as shown on the Zone of Theoretical Visibility ('ZTV') map (**Figure 13-14** of **Chapter 13** of the EIAR). Overall, visibility of the Proposed Turbines of the Proposed Wind Farm along this walking trail will be intermittent, with views generally brief and limited while travelling along the route. Where visibility does occur, the visibility of the proposed turbines will be further mitigated by distance and vegetative screening within the surrounding landscape. Residual visual effects are not considered significant. Mayo Abbey Church and Ruins is located 2km northwest from the nearest Proposed Turbine of the Proposed Wind Farm, however, as discussed throughout **Chapter 13** and its accompanying appendices, the Proposed Project will not alter the physical fabric or key features of the monuments, and any change will be limited to the wider landscape setting, where the proposed turbines will be seen beyond the immediate visual context of the Mayo Abbey Church and Ruins. These effects are not considered significant.

Wind Energy Constraint Theme	Wind Energy Constraint	Consideration
		Components of the Proposed Development, such as the proposed 110kV substation and end masts, are not deemed to be as visually prominent as the Proposed Turbines which form part of the Proposed Wind Farm, however, the proposed 110kV substation and end masts do have the potential to give rise to localised landscape and visual effects. These elements are given full consideration and assessment throughout **Chapter 13** of the EIAR. Visual effects arising from the construction of the proposed 110kV substation, 2 no. new end masts, and associated temporary construction compound, as experienced by visual receptors in the immediate vicinity of the Site are considered to be localised, 'Negative', 'Short Term', 'Not Significant' effects. On balance, these effects are not considered significant. Visual effects of the proposed 110kV onsite substation during the operational phase are likely to be highly localised, 'Long-term', 'Negative' and will be 'Slight'. On balance, these effects are not considered significant. Visual effects of the proposed connection to the existing 110kV overhead line of the Proposed Development are likely to be localised, 'Long-term', 'Negative' and will be 'Not Significant'. On balance, these effects are not considered significant. Please refer to **Chapter 13** of the EIAR for further details.
Cultural Heritage	**Archaeological Heritage** **Built Heritage** › Record of Protected Structures › National Inventory of Architectural Heritage	**Chapter 3** and **Chapter 14** of the EIAR consider archaeological, architectural and cultural heritage. Within **Chapter 14**, an assessment of the potential, indirect operational impacts on the archaeological, architectural and cultural heritage resource has been carried out. Negative operational impacts ranging from imperceptible to moderate are predicted, however no significant impacts have been identified. Slight indirect negative effects have been identified to AH95 (a round tower subject to Preservation Orders and recorded as a National Monument) and AH97 (a ringfort subject to Preservation Orders). These are not significant. No indirect negative effects have been identified to AH96 (a crannog subject to Preservation Orders). Following the implementation of the above mitigation measures, there will be no significant residual effects on the previously unrecorded archaeological resource. No significant negative operational effects have been predicted to archaeological heritage, built heritage, cultural heritage or designed landscape sites, including recorded archaeological monuments, National

Wind Energy Constraint Theme	Wind Energy Constraint	Consideration
		Monuments, monuments subject to Preservation Orders, Protected Structures, and structures recorded on the NIAH. Please refer to **Chapter 3** and **Chapter 14** of the EIAR for further details.
Material Assets – Traffic and Transport	**Transport Routes** › Primary › Secondary › Regional › N17 Knock-Colloney Corridor	Traffic and transport were considered in **Chapter 3** and **Chapter 15** of the EIAR. Once the Proposed Project is operational the traffic impact created by maintenance staff will be imperceptible. There will be no significant traffic related impacts during the construction, operational and decommissioning phases of the Proposed Project. Please refer to **Chapter 3** and **Chapter 15** of the EIAR for further details.
	Rail Networks › Used › Disused › Western Rail Corridor	Rail Networks were considered in **Chapter 3** and **Chapter 15** of the EIAR. The Westport-Dublin Irish Rail line runs to the northwest of the Proposed Project, approximately 1.4km at its closest point (T4). The Proposed Project will not directly interact with the railway line outside of crossing the railway bridge in Claremorris town during the proposed turbine and abnormal load delivery. Therefore, there is no potential for the construction phase of the Proposed Project to impact railway services. Following scoping with Irish Rail, a 5km exclusion zone was identified; in response, Ai Bridges was engaged on behalf of the Applicant to carry out a Telecommunications Impact Assessment (**Appendix 15-4** of the EIAR). The Telecommunications Impact Assessment concluded that the Proposed Project will have no impact on the Irish Rail communications network. Please refer to **Chapter 3**, **Chapter 15** and **Appendix 15-4** of the EIAR for further details.
	Ireland West Airport	**Chapter 3** considers material assets including aviation and Ireland West Airport is considered in **Chapter 15** of the EIAR. An Aviation Review Statement was produced by Ai Bridges (**Appendix 15-6** of the EIAR) to investigate any potential significant effects that the Proposed Project may have on the aeronautical resource in the wider area following feedback received from Ireland West Airport through the scoping exercise.

Wind Energy Constraint Theme	Wind Energy Constraint	Consideration
		An Aviation Review Statement was undertaken for the Proposed Project following feedback received during the scoping exercise which concluded that the Proposed Project will have no residual impact on aviation. Please refer to **Chapter 3**, **Chapter 15** and **Appendix 15-6** of the EIAR for further details.
Other	**Céide Fields**	The Proposed Project is not located within or adjacent to the Céide Fields.
	Atlantic Coastal Landscapes	The Proposed Project is not located within or adjacent to the any Atlantic Coastal Landscapes.
	Wild Atlantic Way › Routes › Discovery Points	The Proposed Project is not located within or adjacent to the any Wild Atlantic Way routes or discovery points.
	Joyce Country and Western Lakes Geopark	The Proposed Project is not located within or adjacent to the Joyce Country and Western Lakes Geopark.