



APPENDIX 2-2

SCOPING CONSULTATION RESPONSES

Fangfei Zhang

From: Environmental Co-ordination (Inbox) <Environmental_Co-ordination@agriculture.gov.ie>
Sent: Monday 29 September 2025 11:35
To: Emma Prior
Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: Meenbog Wind Farm Co Donegal.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from environmental_co-ordination@agriculture.gov.ie. [Learn why this is important](#)

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Good morning,

Please see comments/observations attached.

Regards

Environmental Co-ordination Unit

From: Emma Prior <eprior@mkoireland.ie>
Sent: Friday 5 September 2025 17:55
To: Environmental Co-ordination (Inbox) <Environmental_Co-ordination@agriculture.gov.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain

the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior

Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611



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Disclaimer:

Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid. D'fhéadfadh

an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphoist seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scríos gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.

MKO
Tuam Road
Galway
H91 VW84

26th September 2025

Re: EIA Scoping Document for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal.

Dear Sir/Madam,

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

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department before trees are felled or removed. A Felling Licence application form can be obtained from **Felling Section, Department of Agriculture, Food and the Marine, Johnstown Castle Estate, Co. Wexford**. Email: felling.forests@agriculture.gov.ie or Web [gov.ie - Tree Felling Licences \(www.gov.ie\)](http://gov.ie - Tree Felling Licences (www.gov.ie))

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

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

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

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

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);
2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices are published online at: [gov.ie - Felling Licence Applications \(www.gov.ie\)](http://gov.ie - Felling Licence Applications (www.gov.ie))

3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 14 days to the Forestry Appeals Committee. Felling Licence decision are published online at:
gov.ie - [Felling Licence Decisions \(www.gov.ie\)](http://www.gov.ie)

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

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
- b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
- c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,
 1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project;and
 2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord Pleanála, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.
3. Please note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s)

Yours sincerely,

Neil O'Brien
Felling Section
Department of Agriculture, Food and the Marine
Johnstown Castle
Co Wexford

Emma Prior

From: Defence Property Management Planning
<PropertyManagementPlanning@defence.ie>
Sent: Tuesday 9 September 2025 12:29
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Dear Ms. Prior,

I wish to acknowledge receipt of your below email.

We will consult with our military colleagues and will revert in due course.

Kind Regards

Ruth

Property Management Branch

An Roinn Cosanta

Department of Defence

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

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

From: Emma Prior <eprior@mkoireland.ie>
Sent: Friday 5 September 2025 18:00
To: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Dear Mr. Watchorn,

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If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

MKO

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Business Park, Dublin, D12 XN9W



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Fógra faoi Rúndacht: Tá an ríomhphost seo agus aon iatán a ghabhann leis rúnda. Is leis an duine / nó daoine sin amháin a bhfuil siad seolta chucu a bhaineann siad agus ní ceart iad a léamh ná a scaoileadh chuig aon tríú páirtí gan cead roimh ré ón Roinn Cosanta.

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without the prior consent of the Department of Defence.

Fangfei Zhang

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Monday 20 October 2025 14:11
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: Donegal G Pre002932025 Meenbog Windfarm.pdf

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Good afternoon Emma,

Please find attached heritage-related observations and recommendations for the above mentioned consultation.

I should be grateful if you could acknowledge receipt of same.

Kind regards,
Colette

Colette McCormack
Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage

Aonad na nIarratas ar Fhorbairt
Development Applications Unit

Oifigi an Rialtais, Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Government Offices, Newtown Road, Wexford, Co Wexford, Y35 AP90

From: Emma Prior <eprior@mkoireland.ie>
Sent: Friday 5 September 2025 18:03
To: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Dear Mr. Hillis,

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If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

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Business Park, Dublin, D12 XN9W



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Our Ref: G Pre00293/2025

Your Ref: 240505

(Please quote in all related correspondence)

20 October 2025

MKO
9C Beckett Way
Park West Business Park
Dublin

Via email: eprior@mkoireland.ie

Re: Pre Planning application: (pre-substitute consent) for permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm at Meenbog (and surrounding Townlands) County Donegal.

A chara,

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

Archaeology

The Department of Housing has reviewed the supplied Environmental Impact Assessment Scoping Report for the proposed Meenbog Wind Farm, County Donegal.

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



Planning & Design

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

The Archaeological Impact Assessment must include:

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

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



Further, as the proposed scope includes for rEIA, in relation to those elements of the development that were already progressed, the new AIA must include a full account of any and all archaeological works that were undertaken as part of the mitigation measures for those constructed elements for which substitute consent is sought and any archaeological findings from those works.

Assessment of Potential Effects

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

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

Direct Effects

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

Indirect Effects

In addition to mitigating potential for physical impacts on the archaeological heritage, careful consideration should also be given in design to the potential for impacts on the setting and amenity of recorded monuments and the landscape/s in which they are situated. In this respect, it should be noted that in addition to site-specific vulnerabilities to impact on setting many monument types—for example prehistoric monuments such as Standing Stone Alignments, Standing Stone Rows, Single Standing Stones, as well as some megalithic tombs—are often considered to represent a wide area of associated archaeological settlement and activity. As a result, the bunding/stockpiling of materials, intrusion into viewsheds or other characteristics of a development may have a negative visual impact on such monuments and may diminish or interrupt alignment views and alter key aspects of their original function and layout.



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

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

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

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

The above observations and recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority, in his role as statutory consultee under the Planning and Development Act 2000, as amended.

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

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

Is mise, le meas

Colette McCormack
Development Applications Unit
Administration

Emma Prior

From: Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>
Sent: Tuesday 23 September 2025 12:13
To: Emma Prior; Transport GCU
Cc: Robert Kennedy; Thomas Blackwell; info@donegalcoco.ie
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: DoT_Submission.pdf

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Dear Emma,
Please see attached response from the Department of Transport regarding EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co Donegal.
Kind regards,
Ailish

Ailish Kavanagh
Central Policy, Coordination and Reform
An Roinn Iompair
Department of Transport
Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60
T +353 (0)1 604 1177
gcu@transport.gov.ie www.gov.ie/transport

From: Emma Prior <eprior@mkoireland.ie>
Sent: Friday 5 September 2025 18:09
To: Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior

Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

Offices in Galway and Dublin
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Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

Tá ár Ráiteas Príobháideachta le fáil ar www.gov.ie/transport

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Emma Prior
MKO
Tuam Road
Galway
H91 VW84
eprior@mkoireland.ie

23rd September 2025

RE: Scoping Report for Proposed Meenbog Wind Farm, Co Donegal

Dear Emma,

The Department of Transport has the following comments in relation to the Scoping Report for the Proposed Meenbog Wind Farm, Co. Donegal.

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

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

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



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

In this regard, please refer to Department of Transport Circular RW 07 of 2025 and the 'Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets)' which can be accessed at:

<https://www.gov.ie/en/department-of-transport/publications/electricity-transmission-infrastructure-development-roads-sector-engagement-framework-interim-guidance/>

The 'Interim Guidelines' which, as outlined in the Circular, are issued pro tem until the development of any procedures for the planning, regulation, construction and management of Medium or High Voltage cables under public roads by the 'HV Forum' and the conclusion of any outcomes from the Private Wires Consultation undertaken by the Department of Energy, Climate and Communications.

Notwithstanding, in relation to proposed works utilising the public road network, as part of the grid connection routing, it is the Departments opinion that the proposed routing must be undertaken in a manner to avoid the potential to impact on future maintenance, improvement and operation of the road network in this area.

Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24) outlines the objective of reaching 80% of electricity demand from renewable sources by 2030 through a range of measures, including; 'All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution'. Having regard to the measures identified in CAP24 and the information in relation to grid routing included in the subject application, the Department recommends that there is a requirement that the Board establish that the routing proposed represents the 'optimal solution'.

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

- Examination of all available technologies including both Overhead Line (OHL) and Underground Cable (UGC) options (or combinations of both) and route options other than the routing of cables along the public road to ensure the best performing route and technology option is selected, (ensuring compliance with CAP24). The public road should only be considered following a robust MCA determining the optimal solution including examining the most linear solutions



- Examination of options for connection to the national grid network at a point closer to the wind farm in order to reduce the adverse impact on public roads,

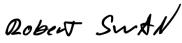
In terms of detailed design of any cable routing impacting the public road network, without prejudice and in accordance with DoT 'Interim Guidelines', the Department would recommend the following conditions should be applied to any grant of permission that includes the laying of high voltage electricity cable in the road network where that routing is identified as the 'optimal solution';

1. Prior to commencement of development, engagement with the planning authority should discuss and agree the route for the HV Cable(s) to identify/agree the routing 'optimal solution' along with the associated requirements for traffic management, road opening licencing, times of work, reinstatement, positioning of chambers/ joint bays etc.
2. A condition requiring the developer to, at a minimum, comply with all appropriate standards and, inter alia the Guidelines for Managing Openings in Public Roads, 2017 in order to ensure orderly development.
3. Electricity cabling shall be laid off carriageway where feasible.
4. Wherever possible, joint bay structures are best located off the carriageway in verges, open spaces, or adjacent sites; and where they must be under carriageway, joint bay structures will be to accepted design standards.
5. High/medium voltage transmission underground cables should not be sited on or attached to existing roads structures, masonry bridges/ culverts and the like.
6. A condition requiring that the location of the cables would be recorded as exactly as possible, using BIM type technology, so as to facilitate the further use of road space for utilities and the maintenance/construction of the public road by the Roads authority. This record should include as constructed surveys of all infrastructure altered, added, removed or relocated and exact detail of the road construction including any drains or other features encountered. The record should be lodged with the local authority and with the ESB Networks for retention on their records.
7. A condition requiring the replacement of culverts that have been excavated during the cable duct placement operation. The replacement culverts should be designed appropriately and include an allowance for the effects of climate change.
8. A condition requiring the developer to notify the Roads Authority of the owner of the cables (Owner) and the controller (Power Controller) of the power transmitted along



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

Your sincerely,

DocuSigned by:

614CE98BAA7042E...

Robert Swan

Central Policy, Co-ordination and Reform Division

Department of Transport

cc Director of Services for Roads, Donegal County Council
 Director of Services for Planning, Donegal County Council.

Fangfei Zhang

From: MARK SWEENEY (ROADS) <msweeney@donegalcoco.ie>
Sent: Monday 8 September 2025 15:34
To: Emma Prior
Cc: planning mailbox
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Follow Up Flag: Follow up
Flag Status: Flagged

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Emma

I would be grateful if we could set up an online meeting to discuss the following with respect to the grid connection works along the public road network.

I note from your email below that you have stated that the grid connection is fully constructed. This is not the case.

The grid connection works was applied for as part of a road opening licence application and the applicant was Mid Cork Electrical.

Donegal County Council has been working with a Mr Michael Muranne and a Mr Thomas Scanlon on the grid connection works, and we are currently waiting on a reply from them in relation to the permanent road reinstatement works between the windfarm access point where it meets the public road along the N15 National Primary road and along the local road network to the sub-station at Clogher.

In addition, as part of the road opening licence conditions it was agreed with the Area Roads Office that the applicant would install three new culverts under the N15 to future proof the drainage crossing the road under the grid connection ducts.

The provision of these three culverts requires planning consent which they did apply for, but it was subsequently refused as it was deemed premature and contrary to proper sustainable planning given the current unauthorised nature of the Meenbog Windfarm and the ongoing legal proceedings.

Is the provision of these three culverts part of the scoping request?

Regards

Mark Sweeney

B Eng MIEI / Senior Executive Engineer / Roads and Transportation Office / Donegal County Council

☎: (074) 91 53 900 | ✉: msweeney@donegalcoco.ie

Comhairle Contae Dhún na nGall | Donegal County Council |



From: CATHERINE COYLE <ccoyle@Donegalcoco.ie> **On Behalf Of** DCCINFO
Sent: 08 September 2025 12:29
To: MARK SWEENEY (ROADS) <msweeney@donegalcoco.ie>
Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

A chara,

Please see email below received via the Council's email address for your attention. Please respond directly to the customer.

Is mise le meas,
Customer Service Centre

From: Emma Prior <eprior@mkoireland.ie>
Sent: 05 September 2025 18:17
To: DCCINFO <info@Donegalcoco.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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FAO Roads Department

Dear Sir/Madam,

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- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

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The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
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Emma Prior

From: planning mailbox <Planning@Donegalcoco.ie>
Sent: Thursday 20 November 2025 11:21
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: SR2504 Meenbog Wind Farm-Response.pdf

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A Chara

See attached response to EIA scoping request on behalf of Senior Executive Planner, Donegal County Council

Kind Regards

Michael McElwaine
Staff Officer Planning Services
Donegal County Council
The Diamond
Lifford
Co. Donegal
F93 Y622
melwaine@donegalcoco.ie +353 074 91 53900



Comhairle Contae
Dhún na nGall
Donegal County Council

From: CATHERINE COYLE <ccoyle@Donegalcoco.ie> **On Behalf Of** DCCINFO
Sent: 08 September 2025 12:29
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Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Customer Service Centre

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Sent: 05 September 2025 18:17

To: DCCINFO <info@Donegalcoco.ie>

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>

Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

MKO

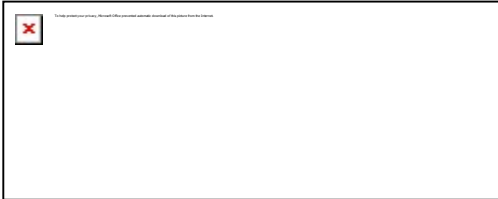
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Business Park, Dublin, D12 XN9W

Offices in Galway and Dublin



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**Comhairle Contae
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Planning Services
E: planning@donegalcoco.ie

Issued by E-mail only: eprior@mkoireland.ie

Your Reference: 240505
Our Reference: SR25/04

20th November 2025

MKO
c/o Emma Prior
Tuam Road,
Galway
H91 VW84

Re: EIA Scoping Documents for Substitute Consent for Meenbog Wind Farm

A Chara

I refer to your submission of 5th September associated with the above-stated subject and wish to advise that upon receipt the planning authority referred the scoping documentation to relevant Statutory Body and internal Donegal County Council Services. One no. reply to these referrals was received by the planning authority within the appropriate period from Donegal County Council Area Roads which focused on the planning application for 3 no. culvert upgrades on the N15 road (under planning ref. 24/60495) which was deemed premature and is currently on appeal with An Coimisiún Pleanála which was emailed directly to you on 8th September.

Following a perusal of the submitted documentation the planning authority considers that the submitted details are broadly in line with Schedule 6 of the Planning & Development Regulations 2001 (as amended) and EU Habitats Directives. The planning authority is also aware that the initial SID was accompanied by an EIAR and NIS. However, given the previous peat stability failure events at Meenbog, any rEIAR should focus a greater emphasis on "Land, Soils and Geology" and "Hydrology and Hydrogeology" of the site to ensure no repeat of previous events at the wind farm site. The EIAR states that lessons have been learned from these events particularly with regards to existing site drainage being maintained during construction. The rEIAR should set out risk management measures particularly with regards to existing site drainage being maintained during construction that may include:

- Prevent undercutting of slopes and unsupported excavations
- Maintain and manage a robust drainage system
- Prevent placement of loads/overburden on marginal grounds
- Set up monitoring systems

- Maintain hydrology of the area by maintaining existing drains to water pressure in the peat to avoid peat becoming buoyant
- Use of experienced geotechnical for site investigations and experienced contractors to carry out the work
- Detailed ground investigation to confirm peat, mineral soil and bedrock condition and properties
- Placement of buttresses on upslope side of access road to retain peat should any instabilities be noted

I trust the above is of assistance.

Mise le meas

A handwritten signature in black ink, appearing to be 'M. McE', written over a horizontal line.

**for Senior Ex. Planner
Planning Services**

/MMcE

Emma Prior

From: JOSEPH GALLAGHER <j.gallagher@donegalcoco.ie>
Sent: Friday 5 September 2025 18:59
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Ms. Prior,

Thank you for your message. The County Donegal Heritage Office is part of the Culture Division and does not have the capacity to comment on individual planning applications. Any planning applications should be referred to the Planning Department of Donegal County Council for appropriate review and comment. Any proposals should be considered in light of the available heritage datasets and the statutory protections afforded aspects of the natural, archaeological, built, cultural and/or geological heritage. The statutory authorities should be contacted in relation to developments that may affect the natural, archaeological, built, cultural or geological heritage. The Donegal County Development Plan also sets out further measures to protect and conserve these heritage assets.

This correspondence should not be taken to constitute consultation with Donegal County Council on this proposed development. Thank you for your attention in this matter.

Kind regards,

Dr. Joseph Gallagher, FRGS
Heritage Officer, County Donegal Heritage Office, Culture Division, Donegal County Council,
Station Island, Lifford, County Donegal

Telephone: (074) 917 2576

E-mail: heritage@donegalcoco.ie

Website: www.donegalcoco.ie/heritage



**Comhairle Contae
Dhún na nGall**
Donegal County Council



**An Chomhairle Oidhreachta
The Heritage Council**

From: Emma Prior <eprior@mkoireland.ie>
Sent: 05 September 2025 18:29
To: JOSEPH GALLAGHER <j.gallagher@donegalcoco.ie>; JOSEPH GALLAGHER <j.gallagher@donegalcoco.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Mr. Gallagher,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

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- Environmental Impact Assessment Report (EIAR)
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The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

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Emma Prior

From: planning applications <planning.applications@failteireland.ie>
Sent: Tuesday 21 October 2025 08:54
To: Emma Prior
Subject: Re: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: Fáilte Ireland EIAR Guidelines 2023.pdf

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Hello Emma,

Thank you for your email and documentation regarding the EIA process for the Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal.

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

Regards,

Yvonne Jackson

Product Development-Environment & Planning Support | Fáilte Ireland

88-95 Amiens Street, Dublin 1, D01 WR86

M +353 (0)86 0357590



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Sent: Friday 5 September 2025 18:34
To: planning applications <planning.applications@failteireland.ie>

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>

Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

[AIRE] Tháinig an teachtaireacht seo ó lasmuigh de Fáilte Ireland. Bí cúramach le hipearnasc, le ceangaltáin agus le treoracha sa ríomhphost seo.

[ATTENTION] This message originated from outside of Fáilte Ireland. Please treat hyperlinks, attachments and instructions in this email with caution.

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Kind regards,
Emma.

Emma Prior
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EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects



July 2023

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1. Introduction

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

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

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

2. Background to this Document

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

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

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

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

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

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

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

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

3. Legislation and Statutory Guidance

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

Legislation

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

Statutory Guidance

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

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

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

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

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

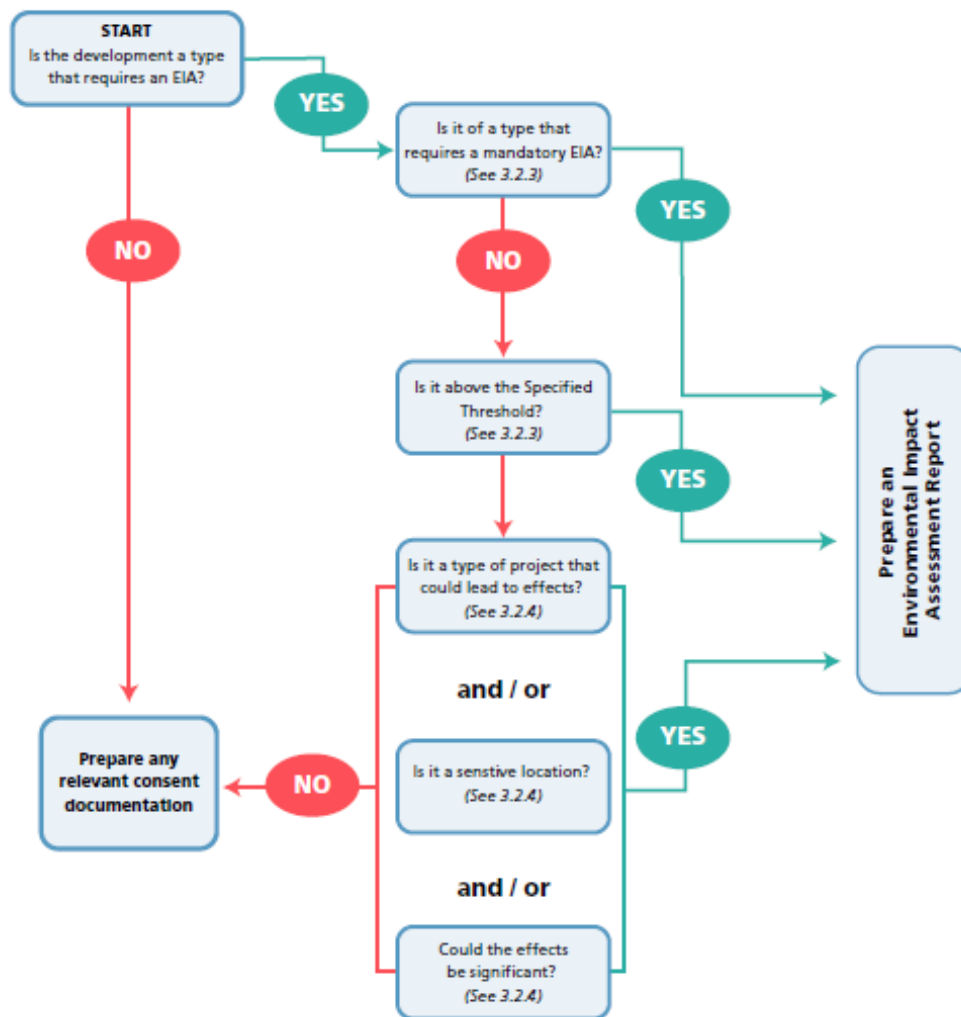
The process of EIA is set out in the EPA EIAR Guidelines, this document should be read in conjunction with and used as supplementary guidance to the EPA EIAR Guidelines. The process for ascertaining whether an EIAR is required is known as 'screening' and the process to determine the breadth and scope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

Screening

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

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

Figure 1: EIAR Screening Process



(Taken from Fig 3.2 of the EPA Guidelines)

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

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

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

EIAR Scoping

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

4. Assessing Tourism

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

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

Projects which involve a tourism element

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

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

Projects which may have an impact upon tourism

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

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

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

- Pace of Life

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

5. Guiding Principles of EIAR

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

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

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

6. Consideration of Competency and Qualifications

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

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

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

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

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

7. EIAR Requirements

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

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

Project Description

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

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

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

Assessment of Alternatives

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

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

Baseline Assessment

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

For example, in a tourism context;

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

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

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

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

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

Impact Assessment

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

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

Population and Human Health

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

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

Biodiversity

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

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

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

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

Land, Soils and Geology

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

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

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

Water

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

Air Quality and Climate

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

Noise and Vibration

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

Material Assets; Traffic and Transport

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

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

Cultural Heritage

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

Archaeology

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

Material Assets; Waste Management

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

Material Assets

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

Landscape

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

Major Accident and Natural Disaster

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

Interaction of Impacts

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

Cumulative Impact

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

Transboundary Impact

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

Mitigation & Monitoring

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

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

Reduce the exposure of sensitive resources to excessive environmental impact.

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

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

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

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

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

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

Residual Impacts

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

8. Sources of information on Tourism

Information available online

Fáilte Ireland

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

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

Discover Ireland:

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

Tourism Ireland

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

Local Authorities

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

Regional Assemblies

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

Central Statistics Office

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

Emma Prior

From: DCEE Planning Notifications <PlanningNotifications@dcee.gov.ie>
Sent: Friday 19 September 2025 12:21
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: 2025.09.19 GSI Submission.pdf

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Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Emma,

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

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

Kind regards,
Luke Thompson

Luke Thompson, Administrative Officer
Planning Advisory Section

An Roinn, Aeráide, Fuinnimh agus Comhshaoil
Department of Climate, Energy and the Environment

Teach Tom Johnson, Bóthar Haddington, Baile Átha Cliath, D04 K7X4
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luke.thompson@dcee.gov.ie

From: Emma Prior <eprior@mkoireland.ie>
Sent: Friday 5 September 2025 18:37
To: DCEE GSI Planning <GSIPlanning@GSI.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Patricia Smullen (DCEE) <Trish.Smullen@gsi.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Dear Ms. Smullen,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

MKO

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Emma Prior
MKO
Tuam Road
Galway, H91 VW84

10 September 2025

Re: EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co Donegal
Your Ref: 240505
Our Ref: 25/144 [c.f. 24/18, 21/292]

Dear Sir/Madam,

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

With reference to your email received on the 05 September 2025, concerning the EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co Donegal, we recommend using our various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. For more detailed information on how to access this data please access 'Data and Maps' [Data & Maps \(gsi.ie\)](#) on our 'Geoscience for planning' webpage. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution).

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

Land and soils <i>Soil</i> - Subsoils (Quaternary Geology) - Tellus Geochemistry - Geotechnical <i>Geology</i> - Bedrock - Geophysics - Bedrock & Quaternary 3D	Water <i>Groundwater</i> - Aquifers GW vulnerability, GWPSs (GWPPs) <i>Surface water</i> - Tellus Geochemistry <i>Estuarine & marine waters</i> - Marine and coastal <i>Flooding</i> - GWClimate - Karst	Climate Change <i>Carbon accounting / Carbon balance</i> - Geothermal - Carbon capture and storage <i>Climate change trends</i> - National coastal change assessment
Cultural Heritage <i>Archaeology</i> - Cherish <i>Underwater Archaeology</i> - Shipwrecks	Material Assets <i>Built Services</i> - Natural resources (Minerals & Aggregates) - Active quarries	The Landscape <i>Landscape Appearance & Character</i> - Physiographic units <i>Historical landscapes</i> - Historic mines
Other Relevant Data		
<i>Natural (Geo) hazards</i> - Landslide Susceptibility Mapping - Groundwater flooding - Coastal vulnerability - Subsidence - Radon	<i>Natural heritage</i> - Geoheritage (County Geological Sites) - Dimension Stone/Stone Built Ireland	



Other Comments

Please note that Geological Survey Ireland have no further comments or observations to make since our last response 24/18.

If we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Dr. Clare Glanville
Senior Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

Trish Smullen
Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

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

Emma Prior

From: Adam Gargan <adam.gargan@hse.ie>
Sent: Friday 3 October 2025 14:41
To: Emma Prior
Cc: Eve Smith; Finan Gallagher; Aoife Gardiner
Subject: NEHS Submission - Meenbog Windfarm, Meenbog, Co. Donegal
Attachments: EIA Scoping Cover Letter.pdf; NEHS Submission Meenabog Wind Farm.pdf

You don't often get email from adam.gargan@hse.ie. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good afternoon,

Please see the attached HSE National Environmental Health Service submission with regard to Meenbog windfarm, Co. Donegal.

Kind Regards

Adam Gargan
Oifigeach Sláinte Comhshaoil | Environmental Health Officer

Seirbhís Sláinte Comhshaoil, Ospidéal Pobail Dhún na nGall, Drumlonagher, Baile Dhún na nGall, Co Dún na nGall, F94 V670.

Environmental Health Service, Donegal Community Hospital, Drumlonagher, Donegal Town, Co Donegal, F94 V670.

0871660324 | 074 91 23759 | adam.gargan@hse.ie



"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil. Seains gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhísí ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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HSE EIA Scoping

National Environmental Health Service Submission Report

Date: 03/10/2025

Our reference: EHIS 5247

Report to: MKO, Tuam Road, Galway, H91 VW84- Emma Prior
<eprior@mkoireland.ie>

Type of Consultation: EIA Scoping

Proposed development: Meenbog Wind Farm in County Donegal

Details of the application were circulated to the following HSE stakeholders on the 8th of September 2025:

- Emergency Planning
- National Capital Estates Office – Regional AND
- Director of National Health Protection
- REO West & North West

General Introduction

Planree Ltd. ('the Applicant') intends on applying to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000, as amended ('the Act'), for permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection (the "Existing Development") and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal ('the Prospective Development'), together (the "Subject Development"). The Meenbog Wind Farm Site where the construction activities have taken place for the Wind Farm is referred to as the "Wind Farm Site". The grid connection associated with the Meenbog Wind Farm will be referred to as the "Grid Connection Site". The Wind Farm Site and the Grid Connection Site together will be referred to as the 'Site'. The Meenbog Wind Farm Site is located within the townlands of Meenbog and Croaghonagh. The Grid Connection Site associated with Meenbog Wind Farm



is located within the townlands of Cashelnavean, Tawnawully Mountains, Friarsbush, Ardinawark, Keadew Upper, Keadew Lower and Cullionboy.

The Site is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town. It adjoins County Tyrone, specifically the administrative division of Omagh West, Barony of Termonamongan and the townlands of Slievadoo, Meenakeeran, and Sixth Corgary or Second Croagh along the Southeast Site boundary and is located approximately 19km west of Castlederg.

Following the peatslide, a number of deviations from the permitted plans for the Meenbog Windfarm were identified by Donegal County Council (DCC) and set out in a warning letter and subsequent clarifications under Section 152 of the Planning and Development Act, 2000 (as amended).

In October 2023, DCC sought injunctions pursuant to Section 160 of the Planning and Development Act 2000 restraining Planree from further development of the site until the issue of unauthorised development at the site had been regularised.

A High Court judgement delivered on the 10th of April 2024 found that as a result of the deviations from the consented plans the entire development, as constructed to date, was considered unauthorised development. On the 18th of December 2024 the Appeals Court (Donegal County Council v. Planree Ltd [2024] IECA 300 (Court of Appeal, Butler J, 18 December 2024) upheld the High Court ruling and affirmed that the entire wind farm, as constructed to date, requires substitute consent. The applicant is therefore applying for permission under Section 177E of the Act for the Subject Development Existing Development and the Prospective Development. Court documents, estimate that “about 86,240m³ of peat slid – of which about 65,740m³ left the 'scar areas' and entered the Shruhingarve Stream via which it flowed into the Mourne Beg River and on to nearby European Sites, including in Northern Ireland, causing significant environmental damage”.

Work on the construction of the wind farm has been paused pending a decision under Section 177E of the Act.

The following documents should be taken into consideration when preparing the Environmental Impact Assessment Report:

- Guidelines on the information to be contained in EIAR, 2022, www.epa.ie.
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanála_on_carrying_out_eia_-_August_2018.pdf



EU publication: Environmental Impact Assessment of Projects - Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf

Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the National Guidance for EIA and the EIAR accompanying a planning application.

New guidelines can be seen at:

<https://www.epa.ie/publications/monitoring--assessment/assessment/guidelines-on-the-information-to-be-contained-in-environmental-impact-assessment.php>

The applicant should also consider the findings of the High Court judgement issued in the judicial review of the Derryadd Wind Farm. (2021 IEHC 390 [20202 No. 557 JR] P. Sweetman v An Bord Pleanála)

Generally the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:

a) Description of the receiving environment; b) The nature and scale of the impact; c) An assessment of the significance of the impact; d) Proposed mitigation measures; e) Residual impacts.

Directive 2014/52/EU has an enhanced requirement to assess likely significant impacts on Population and Human Health.

It is the experience of the National Environmental Health Service (NEHS) that impacts on human health are often inadequately assessed in EIAs in Ireland. It is recommended that the wider determinants of health and wellbeing are considered in a proportionate manner when considering the EIA. Guidance on wider determinants of health can be found at www.publichealth.ie

In addition to any likely significant negative impacts from the proposed development, any positive likely significant impacts should also be assessed.

The HSE will consider the final EIAR accompanying the planning application and will make comments to the Planning Authority on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact. A site visit was carried out by Environmental Health Officer Adam Gargan on 01/10/2025.

The National Environmental Health Service (EHS) recommends that the following matters are included and assessed in the EIAR.



- Public Consultation • Decommissioning phase of the proposed wind farm • Siting and location of turbines • Noise & Vibration • Shadow Flicker • Air Quality • Surface and Groundwater Quality • Geological Impacts • Ancillary facilities • Cumulative impacts

The Donegal County Development Plan is the principal land use planning strategy document for County Donegal and sets out a vision for the sustainable future development of the County together with objectives and policies designed to achieve this vision. Chapter 11 of the Donegal County Development Plan 2024-2030 (DCDP) policies and objectives relates to landscape.

The protection of sensitive landscapes from unsuitable developments is seen as one of the Council's most important roles. The DCDP describes the designation of landscapes of the highest quality which are characterised by wilderness, and which have little or no man-made structures, including high quality coastal or upland areas. These areas are known as Areas of Especially High Scenic Amenity (EHSAs). These are mapped on Map 11.1 of the DCDP. The proposed turbine locations fall within the Landscape Classification Areas identified as 'Areas of Moderate Scenic Amenity' and 'Areas of High Scenic Amenity'.

Public Consultation

It is recommended that early and meaningful public consultation with the local community is undertaken to ensure all potentially significant impacts of the proposed windfarm development have been adequately addressed. All parties affected by the proposed development, including those who may benefit financially from the project, must be fully informed of what the proposal entails especially with regard to potential impacts on surrounding areas.

Sensitive receptors and other stakeholders should be identified to ensure all necessary and appropriate mitigation measures are put in place to reduce the likelihood of any complaints about the proposed wind farm development in the future.

The Environmental Impact Assessment Report (EIAR) should clearly demonstrate the link between public consultations and how those consultations have influenced the decision-making process in the EIA. To assist with the consultation and planning process it is recommended that the applicant develops a dedicated website for the proposed windfarm development.

All correspondence, maps, project updates and documentation including the EIAR should be uploaded to the website. The EIAR should state the period of planning permission sought, the length of time construction is estimated to take and if it is anticipated that the windfarm development will be decommissioned and removed or will continue to operate (following any further planning consent) at the end of this period of planning permission (should permission be granted).



Decommissioning

The EIAR should detail the eventual fate of the wind turbines and associated material i.e. will the material be recycled or how will it be disposed of. Information should also be provided regarding the proposed methodology to be used for the disposal of the materials forming the foundations of the wind turbines. The EIAR should indicate the proposed future use of the development site at the end of the planning permission period.

Siting, Location and details of Turbines

The EIAR should include a map and a description of the proposed location of each of the proposed wind turbines.

The National Environmental Health Service expects that details (height and model) of the turbines to be installed will be available at the time planning permission is sought and will be included in the EIAR. Details of the foundations for the wind turbine including depth, quantity and material to be used should be included in the EIAR.

Assessment of Consideration of Alternatives

The EIAR should consider an assessment of alternatives. The NEHS recommends that alternative renewable energy options to on- shore wind farms should be assessed as part of the EIAR.

Noise and Vibration:

The potential impacts for noise and vibration from the proposed development on all noise sensitive locations must be clearly identified in the EIAR.

The EIAR must also consider the appropriateness and effectiveness of all proposed mitigation measures to minimise noise and vibration. A baseline noise monitoring survey should be undertaken to establish the existing background noise levels. Noise from any existing turbines in the area should not be included as part of the back ground levels. In addition, an assessment of the predicted noise impacts during the construction phase and the operational phase of the proposed windfarm development must be undertaken which details the change in the noise environment resulting from the proposed development.

The Draft Revised Wind Energy Development Guidelines were published in December 2019. Whilst these have yet to be adopted, any proposed wind farm development should have consideration of the draft Guidelines.

https://www.housing.gov.ie/sites/default/files/publicconsultation/files/draft_revised_wind_energy_development_guidelines_december_2019.pdf

Shadow Flicker



It is recommended that a shadow flicker assessment is undertaken to identify any dwellings and sensitive receptors which may be impacted by shadow flicker. The assessment must include all proposed mitigation measures. Dwellings should include all occupied properties and any existing or proposed properties for which planning consent has been granted for construction or refurbishment. It is recommended that turbine selection will be based on the most advanced available technology that permits shut down during times when residents are exposed to shadow flicker. As a result no dwelling should be exposed to shadow flicker. Air quality due to the nature of the proposed construction works generation of airborne dust has the potential to have significant impacts on sensitive receptors.

A Construction Environmental Management Plan (CEMP) should be included in the EIAR which details dust control and mitigation measures.

Measures should include: • Sweeping of hard road surfaces • Provision of a water bowser on site, regular spraying of haul roads • Wheel washing facilities at site exit • Restrict speed on site • Provide covers to all delivery trucks to minimise dust generation • Inspect and clean public roads in the vicinity if necessary • Material stockpiling provided with adequate protection from the wind • Dust monitoring at the site boundary • Truck inspection and maintenance plan • Details of a road maintenance agreement between the wind farm operator and the local roads authority to clarify responsibility for the upkeep and repair of access roads during the construction phase of the project.

Surface and Ground Water Quality

The proposed development has the potential to have a significant impact on the quality of both surface and ground water. All drinking water sources, both surface and ground water, must be identified. Public and Group Water Scheme sources and supplies should be identified in addition to any private wells supplying potable water to houses in the vicinity of the proposed development. Measures to ensure that all sources and supplies are protected should be described.

The National Environmental Health Service recommends that a walk over survey of the site is undertaken in addition to a desktop analysis of Geological Survey of Ireland data in order to identify the location of private wells used for drinking water purposes. Any potential significant impacts to drinking water sources should be assessed. Details of bedrock, overburden, vulnerability, groundwater flows, aquifers and catchment areas should be considered when assessing potential impacts and any proposed mitigation measures.

Any impacts on surface water as a result of the construction of the underground cables should be identified and addressed in the EIAR.

Geotechnical and Peat Stability Assessment.



Notes from the Inspector's Report ABP-314062-22 Date of Site Inspection 25th July 2023.

" The alterations to internal access roads and turbine access roads/hardstanding areas involved groundworks/excavation, deposition of heavy stone material and alterations to the site surface water drainage network. The alterations to the access route to T7 and hardstanding at T9 were in response to a peat slide event (the event and subsequent engagement between the applicant, Planning Authority and the EPA is outlined in detail at Section 7 of the Planning Report submitted with the application). These works have the potential to affect the groundwater regime on this peatland site and have the ability to affect the quality and content of surface water discharges from the site. • The borrow pits involved deep excavation and removal of materials, in a number of instances with the excavated pit reused as a peat store. I observed substantial standing water in each of the borrow pits on my visit to the site. I consider the works have the potential to affect the groundwater regime on this peatland site and have the ability to affect the quality and content of surface water discharges from the site".

A detailed assessment of the current ground stability of the site for the proposed windfarm development and all proposed mitigation measures should be detailed in the EIAR. The assessment should include the impact construction work may have on the future stability of ground conditions, taking into consideration extreme weather events, site drainage and the potential for soil erosion. Information should be provided on the make and model of the turbines and on construction details for the turbine foundations, including the depth and volume of concrete required. An accurate assessment of the potential impacts of the foundations on water quality and peat stability cannot be undertaken without this information. Reference is made to a peat slide which occurred near Ballybofey in Co. Donegal on 13th November 2020 which may have been linked to construction activity at this particular Meenbog Wind Farm.

Potential impacts on water supply associated with contamination following a peat slide include sedimentation and alteration of pH levels. The Environmental Health Service recommends that a detailed Peat Stability/Geotechnical Assessment should be undertaken to assess the suitability of the soil for the proposed development.

The EIAR should include provision for a peat stability monitoring programme to identify early signs of potential bog slides ('pre-failure indicators' see the Scottish Government's 'Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Developments 2017)

<https://www.gov.scot/binaries/content/documents/govscot/publications/advice-andguidance/2017/04/peat-landslide-hazard-risk-assessments-best-practice->



[guide-proposedelectricity/documents/00517176-pdf/00517176-pdf/govscot%3Adocument/00517176.pdf](https://www.gov.scot/document/00517176-pdf/00517176-pdf/govscot%3Adocument/00517176.pdf)

Ancillary Facilities

The EIAR should include details of the location of all site office, construction compound, fuel storage depot, sanitary accommodation and canteen, First Aid facilities, disposal of wastewater and the provision of a potable water supply to the site canteen.

Cumulative Impacts

All existing or proposed wind farm developments in the vicinity should be clearly identified in the EIAR. The impact on sensitive receptors of the proposed development combined with any other wind farm/renewable energy developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed windfarm development.

Eve Smith

Oifigeach Sláinte Comhshaoil | Environmental Health Officer
Environment/Climate Change, Network Support Unit (NSU)

Adam Gargan

Oifigeach Sláinte Comhshaoil | Environmental Health Officer

*** All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to: Finan Gallagher, Principal Environmental Health Officer, HSE West, County Clinic, St. Conal's Campus, Letterkenny Co. Donegal F92 FW6Y**

Emma Prior

From: Eoghan Cross <Eoghan.Cross@fisheriesireland.ie>
Sent: Friday 24 October 2025 16:59
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: Meenbog windfarm - EIA scoping - 24.10.25.pdf

You don't often get email from eoghan.cross@fisheriesireland.ie. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good afternoon Emma,

Apologies for the delay in responding to you; I had to take unexpected leave for an extended period.

Please find attached IFI's observation in relation to this EIA scoping request.

Best wishes,
Eoghan Cross

Eoghan Cross
Fisheries Environmental Officer

✉ Eoghan.Cross@fisheriesireland.ie • ☎ +353 (0) 71 9851435 • 🌐 www.fisheriesireland.ie • 🏠 F94 WV76



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From: info <info@fisheriesireland.ie>
Sent: Monday, September 8, 2025 9:01 AM
To: Ballyshannon Info <ballyshannon@fisheriesireland.ie>
Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Good morning All
Below email received to Citywest Info
Kid regards
Yvonne

From: Emma Prior <eprior@mkoireland.ie>
Sent: Friday 5 September 2025 18:43

To: info <info@fisheriesireland.ie>

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>

Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611



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Emma Prior
MKO
9C Beckett Way
Park West Business Park
Dublin
D12 XN9W



Iascach Intíre Éireann
Inland Fisheries Ireland

Sent via email to: eprior@mkoireland.ie

24th October 2025

RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Ms. Prior,

Inland Fisheries Ireland (IFI) is a statutory body established on 1st July 2010. Under Section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) the principal function of IFI is the protection, management, and conservation of the inland fisheries resource.

On review of the development, the following observations are of relevance in relation to the above project:

The Environmental Impact Assessment Scoping Document (dated 2nd September 2025) outlines that the application site consists of the "Wind Farm Site" which is within the Foyle catchment and the "Grid Connection Site" which is within the Lowerymore sub basin within the Eske sub catchment. Loughs Agency is the prescribed body which should be consulted for relevant projects in the Foyle and Carlingford catchments. As the Wind Farm Site is not within Inland Fisheries Ireland's jurisdiction, comments below are exclusively in relation to the Grid Connection Site.

The Eske is considered an important sub catchment within the Ballyshannon fisheries district as it provides valuable habitat and spawning habitat for various species of fish, including:

- Brown trout (*Salmo trutta*),
- Atlantic Salmon (*Salmo salar*), listed in Annex II of the EU Habitats Directive (92/43/EEC), and
- European Eel (*Anguilla anguilla*), which is protected under Evaluation of Council Regulation (EC) No 1100/2007, as well as the Conservation of Eel Fishing Bye-Law No. C.S. 335, 2024.

The overall ecological status of the subject *LOWERYMORE_020* and *LOWERYMORE_030* waterbodies have been determined as "High" in the most recent EPA report. It is imperative that water quality, habitat and species diversity are protected within these waterbodies during any development or construction projects.

Ireland has seen a long-term trend of decline in the number of high-status river sites in recent decades. Of monitored river sites, 17.7% had high status in the 2020-2023 assessment period compared to 31.6% in the 1987-1990. High ecological status rivers are very sensitive to pollution including siltation and must be given robust protection to ensure there is no decline in status and the Water Framework Directive is complied with.

The EIA should assess the potential impacts the proposed development may have including, damage to the aquatic and associated riparian habitat, pollution of water, changes to hydrology, introduction of non-native species and interference with upstream and downstream movement of the aquatic life present. The assessment should include all aspects of the development, such as the construction of wind turbines, turbine foundations, hardstanding areas, any proposed borrow pit,

access tracks, electrical substation, grid connection, facilitating works on the public road network and at private properties to accommodate the delivery of turbine components etc.

IFI has the following comments to make in relation to the “Grid Connection Site” and the associated elements within the Environmental Impact Assessment.

1. The storage, management and conveyance of materials/cement/oils/fuels must not permit any deleterious matter reaching adjacent surface water systems either directly or indirectly.
2. Risks to water quality arising from works adjacent watercourses, the storage of fuels and materials, refuelling, vehicle maintenance and accidental spillages, etc., should be assessed. Subsequently, appropriate mitigation measures and sensitive work methods should be outlined in a Construction Environmental Management Plan, implemented and strictly enforced during the construction and operational phases, to ensure that no negative impact occurs on the adjacent watercourse.
3. A number of watercourses/drains may exist on site which are not marked on the OSI maps and must be subject to the proposed aquatic buffer zone and surveys.
4. A construction and operational phase water quality and habitat monitoring programme must be put in place. The monitoring of all surface flows during construction is essential and remote sensing equipment should be considered as a normal precaution and extended into the post construction phase.
5. The riparian habitat is integral to the functioning of the aquatic environment. The potential impacts of the development on the riparian habitat should be assessed. Adequately sized aquatic buffer zones must be established along all watercourses.
6. Watercourse crossings existing on site or along the proposed delivery routes must be assessed to determine if works will be required to facilitate site access and the potential impacts of such works. The locations and design of any proposed new watercourse crossings should be provided. IFI requests consultation in relation to the design; length, slope and width of any instream structure, temporary or permanent. Clear span structures such as Bailey bridges should be used for temporary crossings. There must be no negative impact on fish passage as a result of the proposed development.
7. No watercourse diversions are to be carried out to facilitate the development including site roads.
8. An assessment of the site transport routes must be carried out to identify any bridge or culvert replacement or improvement works. Including temporary modifications to facilitate turbine delivery to site.
9. All instream works or other works which may impact directly on a watercourse should only be carried out during between the 1st July to 30th of September (so as to avoid impacting on the aquatic habitat during the salmonid spawning season.) It would be important that this is included in the contract for construction.
10. There must be no spread of invasive species as a result of the proposed development. A survey for the presence of invasive species should be carried out and a management plan put in place where found.
11. It is recommended that a suitably qualified person be on site for the duration of works to ensure:
 - All mitigation measures identified are implemented prior to and during the construction phase, as appropriate.
 - Continual assessment to ensure the mitigation measures are effective.

- Cessation of works should surface water treatment be inadequate for suspended solid removal in surface waters.
- Arrangements are established in relation to a contact protocol for the relevant statutory bodies on progress of works.

12. This proposal should be undertaken in accordance with the relevant sections of the following publications:

- "A Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning": <https://www.fisheriesireland.ie/sites/default/files/migrated/docman/IFIUrbanWatercoursesPlanningGuide.pdf>
- "Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters": <https://www.fisheriesireland.ie/sites/default/files/migrated/docman/2016/Guidelines%20Report%202016.pdf>

Yours sincerely,

E Cross

Eoghan Cross
Fisheries Environmental Officer, Ballyshannon District,
North Western River Basin District, Inland Fisheries Ireland.

Emma Prior

From: Irish Peatland Conservation Council <bogs@ipcc.ie>
Sent: Wednesday 17 September 2025 16:59
To: Emma Prior; Robert Kennedy; Thomas Blackwell
Subject: Re: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: IPCC_SCoping_SubsCons_MeenbogWF_Co_Donegal.pdf; IPCC_2016_Meenbog Scoping Comments.pdf; IPCC_2015_Carrickaduff WF DL ABP.pdf; Irish Peatland Conservation Council - Scoping Document - F - 2025.09.05 - 240505.pdf

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Dear Emma,

Please find attached comments from IPCC regarding the application for substitute consent for the deviations from the consented planning permission.

Thank you for allowing IPCC to make comments and please get back to us if anything further is needed.

Kindest Regards

Tristram Whyte BSc (Hons) Applied Freshwater & Marine Biology
Conservation, Policy & Fundraising Officer
Irish Peatland Conservation Council
Lullymore
Rathangan
Co. Kildare
R51 V293

045 860133
bogs@ipcc.ie
www.ipcc.ie
CHY6829

Registered Charity Number 20013547

Support the work of the Irish Peatland Conservation Council by joining as a Friend of the Bog or purchasing a gift from our online shop <https://www.ipcc.ie/nature-shop/>

On 5 Sep 2025, at 18:46, Emma Prior <eprior@mkoireland.ie> wrote:

Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
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Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA HÉIREANN

Lullymore, Rathangan, Co. Kildare, Ireland R51 V293

Liolach Mór, Rath Iongáin, Co. Chill Dara, Éire, R51 V293

e-mail/ríomhphost: bogs@ipcc.ie

Tel/Teil: +353-(0)45-860133

web/idirlíon: www.ipcc.ie

Emma Prior

Graduate Environmental Scientist

MKO

Tuam Road

Galway

Ireland

H91 VW84

eprior@mkoireland.ie

17th September 2025

RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Ms Prior,

The Irish Peatland Conservation Council (IPCC) was established in 1982 and has 42 years of experience in peatland conservation. Our aim is to conserve a representative sample of intact peatlands. Only 25% of Ireland's original range of peatland habitats are deemed worthy of conservation. 75% have become degraded from multiple pressures such as peat extraction, agriculture, forestry, habitat fragmentation and development (Peatlands and Climate Change Action Plan 2030, IPCC, 2021). Peatland originally accounted for approximately 1/5th (~1.2M ha) of the habitat in Ireland, yet with only 25% of peatland functioning ecologically and hydrologically Ireland has experienced heavy biodiversity loss - which the Government officially announced in 2019 by declaring a Climate and Biodiversity Emergency.

Our work is guided by our 6th Action Plan "Ireland's Peatland Conservation Action Plan 2020" and a recent amendment "Peatlands & Climate Change Action Plan 2030", which focuses on the role of peatlands in tackling predicted climate change and where the IPCC document the estimation of carbon stored and protected in the Lodge Bog Nature Reserve (Co. Kildare). These documents are available for download on our website at www.ipcc.ie. Many of the actions in our plans have been included within the National Peatlands Strategy which has been adopted by every Government Department and Local Authority. The "National Peatlands Strategy" can be downloaded from www.npws.ie.

Meenbog Wind Farm

The IPCC have long called for peatland landscapes to be managed at the landscape level and the development of this wind farm and subsequent peat-slide, coupled-with the un-foreseen environmental impacts has highlighted this further. The factors which have caused this need to be investigated so all future developments are better at predicting impacts to Ireland's rare peatland habitats and species. The IPCC see retrospective planning permission is developers doing what they want and then asking for forgiveness after and is un-acceptable.

IPCC have a number of points to make which must be included and discussed in the remedial Environmental Impact Assessment Report and remedial Natura Impact Assessment.

- A.** How much carbon has been lost due to the deviations of the original consented planning application?
How much carbon has been lost because of the peat-slide? (This also needs to take account of the amount of dissolved organic carbon which entered the water courses and designated aquatic habitats).
How much carbon was released from the extra storage of peat which was not consented?
What is the total amount of peat which was moved around, comparing the original consented and the difference with the deviations.
- B.** Was the alteration of the roads and deviations from the consented plan initiated because it was more favourable to the development or the environment?
- C.** Why did the original site investigations not highlight the needed construction delivery routes and best development footprint/layout. The site topography should have been known from the onset and accompanied

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Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/Rúnaí Comhlacht: Catherine Fitzgerald

Directors/Stiúrthóirí: Martin Kelly, Catherine Fitzgerald, Kate Macnamara, John Pierce, Tiernan Murray, John Lynch, Eugene Dunbar, Rebecca Kummert

Patrons: Don Conroy, HRH Princess Irene of the Netherlands, Eanna Ni Lamhna, Matthijs Schouten, Her Excellency Maaïke van Koldam - Netherlands Ambassador to Ireland, Kathrine Geoghegan Tina Claffey, Monty Don OBE, Helen Conneely.

the original planning application. Deviating from the consented plan last minute to suit the delivery vehicles seems haphazard.

- D.** Why did the Ecological Clerk of Works not document the site, habitat conditions and species present (flora/fauna) before the deviations occurred? This is improper and misses the whole point of appointing an Ecological Clerk of Works.
- E.** While it is claimed that many of the alterations/deviations did not increase the footprint of the development, many were partially or outside the permitted area. Had the developers permission to go into this land and develop it from the landowners?
- F.** Has the additional excavation of rock altered the hydrological impacts and regime of the development and the landscape?
- G.** Why did the original plan not take note of and identify the existing forestry roads with proposals to use them?
- H.** As the positions of the consented borrow pits were changed because of the site topography, why was this not identified in the original site investigations?
- I.** Why was the hydrological integrity of the surrounding wetland landscape not maintained through proper ground proofed research of climate, site topography, current landscape utilisation (inappropriate afforestation) and impacts to designated sites. Just because the original plan was consented does not mean that the development is not a factor in the peat-slide.
- J.** Why do the developers think that the alterations, however minor the individual deviations are, would not cumulatively need extra consent? There is already a list of 45 reasons as to why the Department of Housing, Local Government and Heritage feel that they needed consent, yet unfortunately there is not enough recorded information from the ground to properly assess them. The Department has listed possible impacts to ANNEX IV and V species (Common Frog, Smooth Newt, Pine Marten, Otter, Viviparous Lizard) and red-listed bird species, and this is just from the deviations, the resulting peat-slide has untold consequences to the designated sites and landscape conservation.
- K.** How has the deviations from the consented plan and peat-slide disaster impacted on the conservation of Hen-Harrier?
- L.** Why was the development not stopped when there seems to have been two previous “minor” peat-slides on the eastern flank of the Bunadaowen River Valley during construction?
- M.** Why should this development now be consented and not removed with full restoration and stabilisation of the peatland landscape? It now seems that all the climate and biodiversity benefits in terms of renewable energy developments are now negated.
- N.** Would stabilisation of the peat landscape and wider environment (through restoration and rehabilitation) improved the outcome of this development if concluded before any construction for the renewable energy development?
- O.** What have been the impacts from the deviations, the peat-slide and the currently constructed development on the Water Framework Directive?
- P.** What are the direct and cumulative impacts to the qualifying interests of the designated sites from the deviations and the resulting peat-slide?

Conclusion

It is evident that the development plan was a failure to begin with as the weak peat mass should have been identified at the landscape level. The cumulative impacts from the poor landscape management and utilisation from poor afforestation and the attempt at restoration through tree felling was not all taken into account before permission was given initially. Site topography, drainage, soils, geology and climate predictions and impacts were not adequately addressed from the start. The high number of deviations from the consented plan highlight this. Blanket bog is an ANNEXED habitat under the EU Habitats and Species Directives to begin with and development should not have been consented in any case. In the race for renewable energy developers have been given a green light to throw darts at a map and see what they can get through planning.

IPCC see too many times where mitigation becomes the normal and this is allowing developers to decide where conservation happens. Peatland is already a climate and biodiversity hero by providing many eco-system services and functions such as carbon sequestration, water filtration and refugia for flora and fauna. To destroy them for the 20-30 years of an operational wind farm is not recognising their importance or the fact that they will perform these eco-system services in-perpetuity. IPCC now also see re-occurring is the phrase “it is better to ask for forgiveness than permission” and this needs to be stamped out. It is not good landscape management, does not follow best practice and does not take on board all stake-holders concerns.

IPCC can not support this development and cannot see that without true restoration, remediation and rehabilitation how this project can move forward.

Yours Faithfully,

A handwritten signature in black ink that reads "Tristram Whyte". The signature is written in a cursive, slightly slanted style.

Tristram Whyte Applied Freshwater & Marine Biology BSc(hons), Irish Peatland Conservation Council

Please also find attached IPCC's comments on the original Carrickaduff/Meenbog wind farm development proposal from 2015 and 2016.

References:

Peatlands and Climate Change Action Plan 2030, O'Connell, C.A., Madigan, N., Whyte, T. & Farrell, P., 2021, Irish Peatland Conservation Council.

Emma Prior

From: Christophe O'BRIEN <Christophe.OBRIEN@IAA.ie>
Sent: Wednesday 26 November 2025 10:48
To: Emma Prior
Cc: Thomas Blackwell; Robert Kennedy; Karen O'Neill; Evan Connolly; Planning
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Follow Up Flag: Follow up
Flag Status: Completed

You don't often get email from christophe.obrien@iaa.ie. [Learn why this is important](#)

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Good morning Emma,

For all planning related queries, please email: planning@iaa.ie directly.

Please also contact: planning@airnav.ie

Following [the separation of the Irish Aviation Authority and Air Navigation Ireland \(the IAA ANSP\) from the 30th April 2023](#), Air Nav Ireland has responsibility for the maintenance and safeguarding of en route communications and navigation surveillance equipment in Ireland.

The Irish Aviation Authority (IAA) has no particular requirements for inclusion for the scoping exercise. It is likely that the following general observations would be proffered by the IAA should a formal planning application be made:

"In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to:

- (1) agree an aeronautical obstacle warning light scheme for the wind farm development,*
- (2) provide as-constructed coordinates in WGS84 format together with ground and blade tip height elevations at each wind turbine location and*
- (3) notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection."*

Regards,

Christophe

Christophe O'Brien

Aerodromes Inspector

M: +353 (0) 86 33 22022 |

E: obrienc@iaa.ie | www.iaa.ie

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



ÚDARÁS EITLÍOCHTA NA hÉIREANN
IRISH AVIATION AUTHORITY

From: Emma Prior <eprior@mkoireland.ie>
Sent: Wednesday 26 November 2025 08:36
To: Planning <planning@iaa.ie>
Cc: Christophe O'BRIEN <Christophe.OBRIEN@IAA.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Robert Kennedy <rkennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Evan Connolly <econnolly@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Dear Mr O'Brien,

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- Environmental Impact Assessment Report (EIAR)
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If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Environmental Scientist

MKO

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Business Park, Dublin, D12 XN9W



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Emma Prior

From: IWT Info <info@iwt.ie>
Sent: Monday 29 September 2025 12:23
To: Emma Prior
Subject: Re: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Dear Emma,

Thank you for contacting us. We do not have the staff capacity to respond to this consultation at the moment but we will endeavour to respond if possible.

Kind regards,
Fabiola Vieira

On Fri, 5 Sept 2025 at 18:56, Emma Prior <eprior@mkoireland.ie> wrote:

Dear Ms. Vieira,

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Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,

Emma.

Emma Prior

Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin

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LinkedIn: irishwildlifetrust

Facebook: IrishWildlifeTrust

Instagram: @irishwildlifetrust

Bluesky: @irishwildlifetrust.bsky.social

X/(Twitter): @irishwildlife



Emma Prior

From: Sustainable Energy Authority of Ireland <info@seai.ie>
Sent: Wednesday 10 September 2025 13:11
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Emma,

Thank you for contacting SEAI.

I acknowledge receipt of your email and confirm that I have forwarded it to the RD&D department on your behalf.

If you have any further queries, please do not hesitate to contact us.

Yours sincerely,

Kate

----- Original Message -----

From: Emma Prior <eprior@mkoireland.ie>;
Received: Fri Sep 05 2025 19:04:27 GMT+0100 (Irish Standard Time)
To: Jim Ryan <info@seai.ie>; Reception . <info@seai.ie>; Reception <info@seai.ie>;
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; tblackwell@mkoireland.ie;
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Emma.

Emma Prior
Graduate Environmental Scientist
MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

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Emma Prior

From: Andy Fox <Andy.Fox@seai.ie>
Sent: Monday 15 September 2025 09:21
To: Emma Prior
Cc: Dearbhla Stapleton; Sustainable Energy Authority of Ireland
Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Dear Emma,

I have been sent on your email below regarding Meenbog Wind Farm. Just to note, SEAI are not Statutory Consultees for Onshore Wind projects and as such have no input into Onshore Wind Planning Applications, we are however for Offshore Wind.

Regards

Andy

Andy Fox

Single Point of Contact Development Manager
Sustainable Energy Authority of Ireland
3 Park Place, Hatch Street Upper, Dublin 2

Direct line: +353 1 808 2048

Mobile: 0873697502

Website: www.seai.ie

SPC Website: [Renewable Energy Consenting | Single Point of Contact | SEAI](#)

----- Original Message -----

From: Emma Prior <eprior@mkoireland.ie>;

Received: Fri Sep 05 2025 19:04:27 GMT+0100 (Irish Standard Time)

To: Jim Ryan <info@seai.ie>; Reception . <info@seai.ie>; Reception <info@seai.ie>;

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; tblackwell@mkoireland.ie;

Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Kind regards,

Emma.

Emma Prior

Graduate Environmental Scientist
MKO

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Offices in Galway and Dublin

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Emma Prior

From: INFO <Information@tii.ie>
Sent: Wednesday 17 September 2025 15:23
To: Emma Prior
Subject: TII Ref: TII25-133123 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

You don't often get email from information@tii.ie. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Ms. Prior.

Thank you for your correspondence of 5 September 2025 regarding the above. Transport Infrastructure Ireland's (TII's) position in relation to your enquiry is as follows.

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

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

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

In relation to your EIAR and rEIAR Scoping referral, TII notes that proposals appear to indicate a site access to the N15, national road, via a direct private access at a location on the network that is subject to a 100kph speed limit. In such circumstances, it is critical that the developer/applicant be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply.

Therefore, there are policy and road safety considerations that would need to be resolved in any subsequent application as direct access or intensification of direct access to a national road conflicts with official policy on access to national roads. Alternative arrangements to the local road network should be utilised and not direct access to the national road, contrary to the provisions of official policy. It is noted with concern that the EIAR and rEIAR correspondence received does not appear to consider or address this significant and critical policy conflict.

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

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

- TII notes that the subject site has proposed access to the N15, national road. Access to the road network shall be developed in accordance with official policy and road safety considerations. As outlined above, access directly to a national road outside a reduced 50 – 60kph speed limit location should be avoided in accordance with the provisions of official policy. Alternative arrangements should be identified to ensure adherence to the provisions of official policy and in the interests of road user safety.
- Consultations should be had with the relevant Local Authority/National Roads Design Office, with regard to the locations of existing and future national road schemes.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, including the potential haul route.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Coimisiún Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts.
- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).
- The EIAR and rEIAR should have regard to TII's Environmental Assessment and Construction Guidelines, including the Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (National Road Authority (NRA), 2014).
- The EIAR and rEIAR should consider the 'European Communities (Environmental Noise) Regulations, 2018, (S.I. no. 549 of 2018)', and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (NRA, 2014)').
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads.

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

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

- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR and eEIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are a feature of the development, e.g., turbine

or substation components, separate structure approvals/permits and other licences may be required in connection with the proposed haul route. All national road structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed. Any requirements for 'Exceptional Abnormal Loads' should also be addressed in accordance with TII Publications.

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

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

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

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

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

- Where grid connection and cable routing form part of any development proposal, proposals should be developed to safeguard proposed road schemes, as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc. Consultation should be undertaken with Donegal County Council to ascertain any relevant national road schemes in the area.

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

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

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

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

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

Consistent with CAP24, for all renewable energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives for grid connection takes place,

including alternatives to public road, where appropriate. In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance, upgrades and safety works to existing national roads.

The Scheme promoter should also refer to Department of Transport Circular RW 07 of 2025 and the 'Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets)' which can be accessed at (<https://www.gov.ie/en/publication/ece06-electricity-transmission-infrastructure-development-roads-sector-engagement-framework-interim-guidance/>).

Having regard to the foregoing, in TII's opinion, grid connection routing, where it is proposed to utilise the road network must therefore demonstrate that the route proposed represents the 'optimal solution'.

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

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

No details of grid connection routing appear to be included in the subject EIAR Scoping Report. Having regard to the foregoing, in TII's opinion, the grid connection routing, where it is proposed to utilise the road network, must demonstrate that the route proposed represents the 'optimal solution'. In addition, there is a finite road space available to accommodate all utilities in the road network and TII recommends that a co-ordinated approach to grid connection routing in this area is achieved to avoid risk to the effective delivery of renewable energy projects in the area.

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

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

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

I hope that this information is of assistance to you.

Yours sincerely,

Suzanne Cahill
Senior Regulatory & Administration Executive

From: Emma Prior
Sent: Friday 5 September 2025 19:08
To: Landuse Planning
Cc: Robert Kennedy ; Thomas Blackwell

Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Dear Mr. Mills,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,

Emma.

Emma Prior

Graduate Environmental Scientist

MKO

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735 611



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Fangfei Zhang

From: Emmett Hegarty(C) <emmett.hegarty@water.ie>
Sent: Monday 6 October 2025 22:34
To: Emma Prior
Subject: UE response for Meenbog Windfarm, County Donegal. UE Ref: PN25000029588
Attachments: UÉ_Response_PN25000029588.pdf

You don't often get email from emmett.hegarty@water.ie. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good Morning Emma

Please find attached Uisce Éireann's observations on the scoping document relating to the retention and completion of Meenbog Windfarm, County Donegal. UE Ref: PN25000029588

If there are any questions or issues, please do not hesitate to let me know.

Emmett Hegarty

Development Management Planning

Uisce Éireann

Teach na hAbhann Duibhe, Mala, Co. Chorcaí, P51 K3CX

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emmett.hegarty@water.ie

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

Go raibh maith agat as d'aird a thabhairt.

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Thank you for your attention.

For the attention of Emma Prior
MKO
Tuam Road,
Galway,
H91 VW84

03rd October 2025

By Email: eprior@mkoireland.ie

Re: EIA Scoping Request – Proposed retention and completion of Meenbog Wind Farm, Co. Donegal

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Baile Átha Cliath 1
D01 WA07
Éire

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Dear Emma Prior

Uisce Éireann has received notification of your Environmental Impact Assessment (EIA) scoping request to Planree Ltd.'s forthcoming application to retain and complete Meenbog Wind Farm in County Donegal.

Please see attached, Uisce Éireann's scoping opinion in relation to your proposals and Uisce Éireann's public infrastructure & assets.

On receipt of the planning referral, Uisce Éireann will review the finalised Environmental Impact Assessment Report (EIAR) as part of our planning assessment. Uisce Éireann's will then issue a statutory response to the Planning Authority in line with our obligations as a statutory consultee.

Uisce Éireann's Response to EIAR Scoping Request

The proposed Grid Connection route would bring works into proximity of Uisce Éireann network assets serving the local area. A 75 mm uPVC watermain runs parallel to the N15 road from Ardinawark, and follows the proposed route as it deviates from the N15 and approaches Keadew and Barnesmore.

Please note that Uisce Éireann cannot accept any build over of its assets, or any works that would otherwise disrupt its network infrastructure. Where such an impact is anticipated, it will be necessary to enter into a diversions agreement with Uisce Éireann, prior to the commencement of works.

Separate to this, the proposed development does not describe any on-site human welfare facilities that would require a service connection from Uisce Éireann. Should such a connection be required, the applicant will be required to submit a pre connection enquiry to Uisce Éireann.

In addition to the specific items outlined above please note the following aspects of Water Services which should be considered in the scope of your EIAR;

- a) Where the development proposal has the potential to impact an Uisce Éireann Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann's Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of the report.
- b) Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.
- c) Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- e) Impacts of the development on the capacity of water services (*i.e. do existing water services have the capacity to cater for the new development*). This is confirmed by Uisce Éireann in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to Uisce Éireann to determine the feasibility of connection to the Uisce Éireann network.
- f) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.

- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an Uisce Éireann collection network.
- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers.
- i) Any physical impact on Uisce Éireann assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- j) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to datarequests@water.ie
- k) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- l) Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- m) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (*and resultant potential impact on the capacity of the source*) or the potential of the development to influence / present a risk to the quality of the water abstracted by Uisce Éireann for public supply should be identified within the report.
- n) Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a “protected”/ sensitive area, consideration as to whether the integrity of the site / conservation

objectives of the site would be compromised should be identified within the report.

- o) Uisce Éireann does not permit building over of its assets. As an applicant you are required to;
- survey the site to determine the exact location of the assets. Any trial investigations should be carried out with the agreement and in the presence of Uisce Éireann.
 - Provide evidence of separation distances between the existing Uisce Éireann assets and proposed structures, other services, trees, etc. have to be in accordance with the Irish Water Codes of Practice and Standard Details.
- p) Where a diversion of Public Infrastructure may be required subject to layout proposal of the development and separation distances, the applicant is required to submit a Diversions Enquiry to diversions@water.ie
- q) Mitigation measures in relation to any of the above ensuring a zero risk to any Uisce Éireann drinking water sources (Surface and Ground water).

This is not an exhaustive list.

Please note;

- Where connection(s) to the public network is required as part of the development proposal, applicants are advised to complete the Pre-Connection Enquiry process and have received a Confirmation of Feasibility letter from Uisce Éireann ahead of any planning application.
- Uisce Éireann will not accept new surface water discharges to combined sewer networks.
- Where a new connection(s) is sought, the applicant or developer shall enter into water and/or wastewater connection agreement(s) with Uisce Éireann prior to the commencement of this development.
- Where an existing connection is on place, the applicant or developer may be required to enter into a new or revised water and/or wastewater connection

agreement(s) with Uisce Éireann prior to the commencement of this development.

Queries relating to this EIAR scoping request should be directed to planning@water.ie

Signed on behalf of Dermot Phelan
Connections Delivery Manager

Emma Prior

From: webways@waterwaysireland.org
Sent: Monday 8 September 2025 14:15
To: Emma Prior
Subject: Waterways Ireland Enquiry Acknowledgement

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2 Sligo Road
Enniskillen
Co. Fermanagh
BT74 7JY

Query Type Public consultations

Dear Emma Prior,

Go raibh maith agat as teagmháil a dhéanamh le hUiscebhealaí Éireann. Iarrtar ort glacadh leis an teachtaireacht seo mar admháil go bhfuarthas do ríomhphost. Cuirfear do ríomhphost ar aghaidh chuig an bhfoireann seirbhísí chuí chun deileáil leis. Má bhíonn freagairt de dhíth ar do ríomhphost, déanfaidh muid iarracht teacht ar ais chugat chomh luath agus is féidir.

Thank you for contacting Waterways Ireland. Please accept this as an acknowledgement that your email has been received. Your email will be forwarded onto the relevant service area for its attention. We will endeavour to come back to you as quickly as possible.

Waterways Ireland

Submission
Date : 08/09/2025 14:14:31

Your message To whom it may concern, I hope this message finds you well. I am currently in the process of scoping consultees for the Meenbog Wind Farm, located in County Donegal on behalf of Planree Ltd. Could you kindly provide the appropriate email address for your Planning and/or Environmental Department, so that we can ensure they are included in the consultation process? Your assistance would be greatly appreciated! Kind Regards, Emma Prior

Emma Prior

From: DAERA Direct Strabane <daeradirect.strabane@daera-ni.gov.uk>
Sent: Monday 8 September 2025 10:03
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

You don't often get email from daeradirect.strabane@daera-ni.gov.uk. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Emma,

Thank you for your email however it has been forwarded for to the NI Environment agency nieainfo@daera-ni.gov.uk.

Regards

Carol Mayse

Customer Service Branch
18 Urney Road, Strabane, BT82 9BX
Email address: Daeradirect.strabane@daera-ni.gov.uk
☎ **Tel:** 0300 200 7840



Department of
Agriculture, Environment
and Rural Affairs
www.daera-ni.gov.uk

An Roinn
Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe

Department of
Fairmin, Environment
an' Kintra Matthers

*Sustainability at the heart of a
living, working, active landscape
valued by everyone.*

From: Emma Prior <eprior@mkoireland.ie>
Sent: 05 September 2025 19:24
To: DAERA Direct Strabane <daeradirect.strabane@daera-ni.gov.uk>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

FAO Planning and Environmental Department

Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEiAR)
- Environmental Impact Assessment Report (EiAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain

the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior

Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611



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Your Reference: 240505
Our reference: AE1-25-6756

Emma Prior
Graduate Environmental Scientist
MKO

Email: eprior@mkoireland.ie

3 October 2025

Planning Response Team

NIEA Lisburn

17 Antrim Road

Tonagh

Lisburn

BT28 3AL

Telephone: 028 9056 9604

Email: planningresponse.team@daera-ni.gov.uk

Dear Sirs,

EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

I refer to your correspondence of 5 September 2025 regarding the above and request for comments.

We are pleased to provide comments and advice on the key environmental considerations for the Environment, Marine & Fisheries Group within DAERA.

For your convenience we have provided our comments under the following topic heading:

- Marine and Fisheries
- Regulation Unit
- Water Management Unit
- Natural Environment Division

If you wish to discuss anything raised in our response, please do not hesitate to contact the Planning Response Team using the contact details above.

Yours sincerely,

Planning Response Team



EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Inland Fisheries

The Loughs Agency is the lead body for provision of advice regarding impacts to salmonid and inland fisheries interests within the catchments of Lough Foyle and Carlingford Lough. Consequently, said agency should be consulted in relation to this application. DAERA Inland Fisheries will provide fisheries advice for those areas outside of the catchments of Foyle and Carlingford Loughs.

Marine Licensing

Activities taking place below the mean high water springs mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009.

Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the Mean High Water Spring Tide (MHWST). It is the applicant's responsibility to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

If any parts of this proposal are on, in or over the licensable area, contact must be made with the Marine Licensing Team, DAERA Marine and Fisheries Division, Clare House, 303 Airport Road West, Sydenham Intake, Belfast, BT3 9ED, Tel: 028 90569247, Email: MarineLicensingTeam@daera-ni.gov.uk. Further guidance on the application process and associated forms are available on the DAERA website at [Marine Licensing | Department of Agriculture, Environment and Rural Affairs](#)

It is an offence under the Marine and Coastal Access Act 2009 to carry out a licensable marine activity except in accordance with a marine licence granted by the

DAERA Marine and Fisheries Division. Conviction of such an offence may incur a fine of up to £50,000 and/or two years imprisonment.

DAERA MFD Fish Health Inspectorate

This proposal is directly upstream of Corgary Trout Farm AFFNI 7. Any disturbance to the strata can cause high levels of suspended solids and effect the fish health of this unit. There has been a previous case in this area.

Stringent mitigation of suspended solids and stabilising land is required.

Regulation Unit

Planning Reference: EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Section Reference: AE1-25-6756

Considerations

Regulation Unit, Land and Groundwater Team (LGW) has considered the proposal and on the basis of the information provided refers to standing advice.

Explanatory note

Standing Advice

This standing advice identifies the potential impacts on the water environment that should be considered at the pre-application stage for windfarm applications.

Key environmental considerations

The foundations of wind turbines have the potential to impact on the groundwater environment for example groundwater flow paths, groundwater receptors (aquifers) or secondary receptors (including private water supplies). An assessment of the potential impact facilitates the Regulation Unit, Land and Groundwater Team to form an opinion on the application. Groundwater receptors should be identified and the risk of potential impact assessed and, where required, mitigation measures should be identified. These steps should be assessed through both a desktop and field-based Water Feature Survey.

Further information is provided within “Environmental information required” and “Baseline environmental information”.

Environmental information required

Please see our guidance available on the DAERA website on ‘Water feature surveys’ and ‘Wind farms and groundwater impacts’ available at:

<https://www.daera-ni.gov.uk/publications/best-practice-guidance-documents>

It is recommended that the applicant seeks the professional advice of a hydrogeologist. Hydrogeologists (not hydrologists) can be identified through internet search, Yellow Pages or the Ends Directory (www.endsdirectory.com)

In addition to the guidance listed above Regulation Unit (Land and Groundwater Team) would direct the attention of the applicant/ agent to the planning advice which is available on the DAERA website under the Topic: **Environmental Advice for Planning** (<https://www.daera-ni.gov.uk/topics/environmental-advice-planning>) with particular reference to the following pages:

Regulation Unit

<https://www.daera-ni.gov.uk/articles/development-may-have-effect-water-environment-including-groundwater-and-fisheries>

<https://www.daera-ni.gov.uk/articles/wind-energy-installations>

Baseline environmental information

Groundwater baseline information which will feed into a water feature survey can be obtained from our online NIEA Catchment Data Map Viewer and our WMU Water Information Request Viewer at <https://www.daera-ni.gov.uk/articles/daera-map-viewers>

Information on private water supplies sourced from groundwater might be obtained from:

- Northern Ireland Environment Agency groundwater monitoring sites: Information on the sites can be obtained by either the WMU Water Information Request Viewer or by contacting waterinfo@daera-ni.gov.uk
- Abstraction & Impoundment Licensing: Information on the licensed sites can be obtained by either the WMU Water Information Request Viewer or by contacting waterinfo@daera-ni.gov.uk
- Drinking Water Inspectorate: Information on private water supplies can be obtained by contacting dwi@daera-ni.gov.uk
- Environmental Health section of the local council

Some layers displayed on the map viewers are also available as a digital dataset, which can be downloaded and used within your own project. Follow the guidance on the web page at <https://www.daera-ni.gov.uk/articles/wmu-digital-dataset-downloads> or at <https://www.opendatani.gov.uk/>.

Water Management Unit

Planning: EIA Scoping Request for Meenbog Wind Farm

Section Reference: WMU/PC/ 38111-1

Date of Response: 15/08/2025

Water Management Unit notes the location of this proposal.

Baseline

In relation to Northern Ireland Baseline Information and Data Sources, DAERA have two map viewers in relation to the aquatic environment that may be of use, Water Information Request Web Viewer and NIEA Catchment Data Map Viewer, both of which can be found at <https://www.daera-ni.gov.uk/articles/daera-map-viewers>

Several useful information sources are available that highlight the current state of the environment in Northern Ireland at a regional level which could be referenced, including the Northern Ireland Environmental Statistics Report, the latest of which currently is dated May 2025.

Northern Ireland Environmental Statistics Reports: <https://www.daera-ni.gov.uk/articles/northern-ireland-environmental-statistics-report>

DAERA issued a consultation document on Significant Water Management Issues to inform the development of the third cycle River Basin Management Plan (2021-2027). This gives further consideration of the pressures and their sources on water quality in Northern Ireland.

Further details on this issue can be found at [Planning for the third cycle River Basin Management Plan 2021-2027 - Consultation on Significant Water Management Issues December 2019 | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](https://www.daera-ni.gov.uk/articles/planning-for-the-third-cycle-river-basin-management-plan-2021-2027-consultation-on-significant-water-management-issues-december-2019)

River Basin Management Plans are the key tools for implementing the Water Framework Directive and to achieving its objectives. If the potential for impacts to the aquatic environment in Northern Ireland are identified, then the NI River Basin Management Plans must be considered during the process. It is important that cross border river basins are given special attention as ecological functionality cross jurisdictional boundaries.

DAERA has published the River Basin Management Plan for the 3rd cycle period which runs from 2021-2027. The plan provides an update on the health of Northern Ireland's water environment (the status of water bodies) and sets out our targets (objectives) and actions (programme of measures) on how we want to improve our water environment in the next six years. The plan covers the North Western, Neagh Bann and North Eastern river basin districts (RBD) and includes detailed status updates on each RBD.

The River Basin Management Plan for the 3rd cycle and supporting documents can be found at: [Third River Basin Management Plan for Northern Ireland | Department of Agriculture, Environment and Rural Affairs](https://www.daera-ni.gov.uk/articles/third-river-basin-management-plan-for-northern-ireland)

There are several key pieces of environmental legislation relating to the Water Environment and its protection in Northern Ireland.

A list of Northern Ireland's environmental legislation relating to the aquatic environment including links to each individual piece of legislation is available at [Water | NetRegs | Environmental guidance for your business in Northern Ireland & Scotland](#)

Key environmental considerations

Refer to:

- DAERA Standing Advice Pre-Application Discussion Advice:

All DAERA Standing advice referred to in this response unless otherwise stated can be found at the following link [Standing Advice | Department of Agriculture, Environment and Rural Affairs](#)

Environmental information required.

Impacts that should be considered include, (but may not be limited to), those relating to water quality, water quantity, hydromorphology, and in addition any impact on NI/RoI migratory/mobile species such as salmon. Assessment should consider all potential impacts both direct and indirect.

At the pre-application stage of a development there is limited information about the circumstances, scope, and nature of the project and therefore Water Management Unit can only provide 'general' advice.

The following Standing Advice in relation to the aquatic environment will be particularly relevant to this application: (Note depending on the specifics of this proposal other DAERA Standing Advice will also be appropriate).

- DAERA Standing Advice Commercial or Industrial Developments
- DAERA Standing Advice Culverting
- DAERA Standing Advice Pollution Prevention Guidance
- DAERA Standing Advice Discharges to the Water Environment
- DAERA Standing Advice Abstractions and Impoundments.

Further guidance

Water Management Unit would recommend that any future application clearly demonstrate the following.

1. Clear details of any proposed works in, near or liable to affect a waterway (as defined below) including any proposed culverting, realignment, and crossings.

2. How will foul sewage be disposed of from the proposed development both during construction and if applicable during the operational phase.
3. Clear details of how surface water will be disposed of from the proposed development during both the construction and operational phases.
4. Water Management Unit recommends the application demonstrates compliance with all the relevant precepts contained in DAERA Standing Advice Pollution Prevention Guidance. In addition, the application should demonstrate compliance with all the relevant precepts contained in documents referenced within this Standing Advice, such as GPP's. Water Management Unit notes the scoping document references PPG documents. These are out of date. Only the most up to date best practice should be utilised during these works.
5. The identification of any statutory environmental permissions relating to the water environment that will be required, / applied for, as part of this proposal. Water Management Unit recommends early identification of this and subsequent early engagement with the relevant statutory body.

Proposal Specific Guidance

The risks from certain activities to the aquatic environment are greater than others and all proposed mitigation must be proportionate and commensurate to that risk. The risks can be further increased due to the location of the site.

Water Management Unit consider the definition of a waterway to be that as defined under the NI Water Order 1999:

"Waterway" includes any river, stream, watercourse, inland water (whether natural or artificial) or tidal waters and any channel or passage of whatever kind (whether natural or artificial) through which water flows.

In this Order any reference to a waterway includes a reference to the channel or bed of a waterway which is for the time being dry.

The location and length of any proposed culverting, realignment, and crossings of a waterway as defined above, (including those needed to access the area of works), should be clearly identified.

Water Management Unit recommends the applicant refer and adhere to all the relevant precepts contained in DAERA Standing Advice Culverting.

Clear details of how foul sewage will be disposed of from the proposed development during the construction and if applicable during the operational phase should be provided.

Clear details should be provided of how surface water will be disposed of from the proposed development during the construction and operational phases. It should be noted Water

Management Unit favour (where appropriate) the use of Sustainable Urban Drainage Systems. Water Management Unit recommends the applicant refer and adhere to all the relevant precepts contained in DAERA Standing Advice Sustainable Drainage Systems.

Water Management Unit recommends the applicant refer and adhere to, and the application demonstrate compliance with all the relevant precepts contained in DAERA Standing Advice Pollution Prevention Guidance. In addition, all the relevant precepts contained in documents referenced within this Standing Advice including, but not limited to:

1. Understanding your environmental responsibilities – good environmental practices: GPP 1
2. Above ground oil storage tanks: GPP 2
3. Use and design of oil separators in surface water drainage systems: GPP 3
4. Treatment and disposal of wastewater where there is no connection to the public foul sewer: GPP 4
5. Works and maintenance in or near water: GPP 5
6. Working at construction and demolition sites: GPP 6
7. Dewatering underground ducts and chambers: GPP 20
8. Pollution incident response planning: GPP 21
9. Dealing with spills: GPP 22
10. Safe Storage of Drums and Intermediate Bulk Containers (IBCs): GPP 26
11. Installation, Decommissioning and Removal of Underground Storage Tanks: GPP 27
12. Control of Pollution (Oil Storage) Regulations (Northern Ireland) 2010
13. CIRIA guidance documentation C532 'Control of water pollution from construction sites: guidance for consultants and contractors

Guidance for Pollution Prevention (GPP) documents are available at

<https://www.netregs.org.uk/environmental-topics/guidance-for-pollution-prevention-gpp-documents/>

A guidance document for the Control of Pollution (Oil Storage) Regulations (Northern Ireland) 2010 providing background information on the Regulations can be found at:

[Control of Pollution \(Oil Storage\) Regulations \(Northern Ireland\) 2010 guidance | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](https://www.daera-ni.gov.uk/control-of-pollution-oil-storage-regulations-northern-ireland-2010-guidance)

CIRIA Guidance can be obtained at:

https://www.ciria.org/ci/Civil_infrastructure/CIRIA_guidance.aspx.

The identification of any statutory environmental permissions relating to the water environment that will be required / applied for as part of this proposal. Water Management Unit recommends early identification of this and subsequent early engagement with the relevant statutory body.

Water Management Unit would like to point out that they are not the competent authority to comment on any peat stability issues. If peat instability were likely at the site, Water Management Unit would have concern regarding potential impacts on surface waters. If peat stability may be an issue at this site the applicant should address this and Water

Management Unit recommends the Planning Authority should consult the relevant competent authority for any considerations, they might have.

Effective mitigation measures must be in place to protect the water environment and surrounding water bodies from any discharge into them that may damage ecological status and to ensure that the Water Framework Directive (WFD) objectives for water bodies are not compromised nor the WFD objectives in other downstream water bodies in the same and other catchments.

The applicant should be informed that it is an offence under the Water (Northern Ireland) Order 1999 to discharge or deposit, whether knowingly or otherwise, any poisonous, noxious, or polluting matter so that it enters a waterway or water in any underground strata. Conviction of such an offence may incur a fine of up to £20,000 and / or three months imprisonment.

The applicant should ensure that measures are in place to prevent pollution of surface or groundwater as a result of the activities on site, both during construction and thereafter.

Natural Environment Division

Date of NED Response: 1 October 2025

Considerations

NIEA Natural Environment Division (NED) acknowledges receipt of a consultation for an Environmental Impact Assessment scoping request for the regularisation of several alterations to the original Planning Permission for the 19 turbine Meenbog Wind Farm in County Donegal. These alterations are required following a peat slide which occurred on 12 November 2020.

NED has considered the Environmental Impact Assessment Scoping Document: Meenbog Wind Farm Substitute Consent 02/09/2025.

The proposal is subject to the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended) (known as the Habitats Regulations).

Designated Sites

The application site is hydrologically connected to the River Derg, which is part of the River Foyle and Tributaries Special Area of Conservation (SAC) and Area of Special Scientific Interest (ASSI), and is adjacent to Killeter Forest Bogs and Lakes ASSI and Croagh Bog ASSI (hereafter referred to as the designated sites) which are of international and national importance and are protected by Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended) and The Environment (Northern Ireland) Order 2002 in Northern Ireland.

- River Foyle and Tributaries SAC is designated for watercourses of plain to montane levels with the *Ranunculus fluitantis* and *Callitriche-Batrachion* vegetation, Atlantic Salmon (*Salmo salar*) and Otter (*Lutra lutra*).
- Killeter Forest Bogs and Lakes ASSI is designated for intact blanket bogs and oligotrophic lakes.
- Croagh ASSI is designated for its extent of intact blanket bogs and for the Argent and Sable Moth *Rheumaptera hastata*.

There are salmon records within the development site and the closest record within River Foyle and Tributaries ASSI/SAC is 3.6km downstream. The habitats within the River Foyle system that could potentially be affected by the development are salmon nursery, holding and spawning habitats. The development could cause permanent loss or fragmentation to habitats. Excess sediment can smother spawning habitats, reducing habitat quality and reduction in food species.

NED consider that the development has the potential to pose significant risks to the River Foyle and Tributaries SAC/ASSI:

- Degradation of the adjacent aquatic environment from contaminated runoff resulting during construction and operational works.
- Degradation of the aquatic environment through an increase in suspended solids and contaminated surface water run-off (e.g. silt laden run-off, spoil/cement slurries/plant fuel/oil, wastewater, chemical contaminants)
- Peat failure/slide resulting in significant sediment mobilisation, resulting in sedimentation of downstream water bodies.
- Sediment released into the watercourse from construction work can be detrimental to salmon, resulting in the gills being smothered, or their passage upstream impeded. Sediment can

Natural Environment Division

smother gravels by infilling of interstitial spaces, leading to reduced oxygen flow across the spawning bed.

- Construction related pollution incidents can result in a reduction of prey for otters due to adverse impacts on fisheries. Additionally, otters may be directly impacted through destruction of holts or disturbance during construction works.

NED recommend that any future consultation should include:

1. An outline Construction Environmental Management Plan (oCEMP) which should identify potential risks to the aquatic environment, potential pollution pathways, and mitigation measures to negate such risks. It should include;
 - Construction Method Statement(s), including details of construction and excavation
 - Pollution Prevention Plan, including details of a suitable buffer of 10m between the location of refuelling, storage of oil/fuel/substrate/construction materials/machinery, concrete mixing and washing areas and any watercourses/surface drain on site
 - Site Drainage Plan, including details of Sustainable Drainage Systems (SuDS), foul waste disposal, surface water disposal/treatment and silt management measures
 - Spoil Management Plan, including location of spoil storage areas outwith the 10m buffer zone
 - Environmental Emergency Plan, including details of emergency spill procedures and regular inspections of machinery onsite
 - Water Quality Monitoring Plan
 - Mitigation measures to be put in place to protect otter and salmon communities
 - Details of the appointment of an Ecological Clerk of Works (ECoW), detailing their roles and responsibilities.

This list is not exhaustive but should merely be used as a guideline for considerations to be made.

2. Details of the proposed works that are within/adjacent/hydrologically connected to any designated sites. This should include any proposed mitigation measures to protect the site from any potentially adverse impacts from the proposal. All Ecological Surveys and Habitat Surveys for these areas should also be submitted.
3. A Habitats Regulations Assessment should be conducted to determine if the proposal has the potential to impact nearby European designated sites.

Further Guidance

Please note that NIEA have developed a range of standing advice and a biodiversity checklist that would assist with the consideration of potential impacts of planning proposals on natural heritage interests:

NIEA Standing Advice can be found at: [DAERA-Standing-Advice](#)

NED survey specifications and other planning related advice can be found at: <https://www.daera-ni.gov.uk/articles/site-survey>

Natural Environment Division

The DAERA website <https://www.daera-ni.gov.uk/> includes:

- Details of all regional, national and international designated sites in Northern Ireland
- Northern Ireland Biodiversity Strategy
- Northern Ireland Habitat and Species Action Plans
- Areas of Outstanding Natural Beauty
- Landscape Character Areas
- Environmental Legislation

Information on the flora, fauna and geology of Northern Ireland can be obtained from the Habitas website: <http://www.habitas.org.uk/>

Site specific environmental data (e.g. species records) can be obtained from the Centre for Environmental Data and Recording (CEDaR). These can be accessed by contacting CEDaR, National Museums NI, 153 Bangor Road, Cultra, Holywood, BT18 0EU. Website: <http://www.nmni.com/cedar>

NED promotes the submission of biodiversity data to CEDaR, and recommends that species records generated as part of the EIA process are submitted to CEDaR by going to: <https://www.nmni.com/CEDaR/CEDaR-submitting-records.aspx>

Emma Prior

From: DoH WebMaster <webmaster@health-ni.gov.uk>
Sent: Tuesday 9 September 2025 15:34
To: Emma Prior
Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: Department of Health NI - Scoping Document - F - 2025.09.05 - 240505.pdf

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Emma

DEARA may be better placed to help with your enquiry [Home | Department of Agriculture, Environment and Rural Affairs](#)

DoH Webmaster

From: Emma Prior <eprior@mkoireland.ie>
Sent: 05 September 2025 19:27
To: DoH WebMaster <webmaster@health-ni.gov.uk>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

FAO Planning and Environmental Department

Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior

Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

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Fangfei Zhang

From: DFI Regional Planning <Planning@infrastructure-ni.gov.uk>
Sent: Friday 28 November 2025 15:19
To: Emma Prior
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: Department of Infrastructure NI - Scoping Document - F - 2025.09.05 - 240505.pdf
Follow Up Flag: Follow up
Flag Status: Completed

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Dear Emma

Thank you for your email of 5 September and apologies for the delay in issuing a response.

Under Regulation 30 of the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017, the Department can enter into consultations with another EEA state regarding the potential significant effects of a proposed project on the environment in Northern Ireland and the measures envisaged to reduce or eliminate such effects. Given the proximity of the development to the border with Northern Ireland, potential transboundary effects should be considered as part of the environmental impact assessment.

Kind regards

Dfi Planning
Regional Planning Policy & Casework



From: Emma Prior <eprior@mkoireland.ie>
Sent: 05 September 2025 19:29
To: DFI Public Mailbox Enquiries <Info@infrastructure-ni.gov.uk>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

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Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior

Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12
XN9W



Offices in Galway and Dublin

mkoireland.ie | +353 (0)91

735 611

McCarthy Keville O’Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

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Emma Prior

From: NIE Customer Contact <CustomerContact@nienetworks.co.uk>
Sent: Monday 8 September 2025 07:26
To: Emma Prior
Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: NIE Networks - Scoping Document - F - 2025.09.05 - 240505.pdf

You don't often get email from customercontact@nienetworks.co.uk. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good Morning Emma

Thank you for contacting NIE Networks. We are the network operator for Northern Ireland and do not cover Donegal. You will need to contact ESB as they own the network in the Republic of Ireland.

Kind Regards

Denise

Social Media Advisor

Customer & Operations Directorate
NIE Networks



T: +44 (0)3457 643 643 |

[website](#) | [facebook](#) | [twitter](#) | [youtube](#) | [instagram](#) | [linkedin](#)

Northern Ireland Electricity Networks Limited Registered Office: 120 Malone Road, Belfast, BT9 5HT. Registered in N.Ireland NI 26041

From: Emma Prior <eprior@mkoireland.ie>
Sent: 05 September 2025 19:41
To: NIE Customer Contact <CustomerContact@nienetworks.co.uk>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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FAO Planning and Environmental Department

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Emma.

Emma Prior
Graduate Environmental Scientist

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Business Park, Dublin, D12 XN9W



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Emma Prior

From: waterline <waterline@niwater.com>
Sent: Thursday 11 September 2025 15:46
To: Emma Prior
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

You don't often get email from waterline@niwater.com. [Learn why this is important](#)

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Dear Ms Prior,

CMS Reference: 9080925/33557

Re: EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Thank you for your email received on the 05 September 2025, regarding the above.

Please be advised that this matter has been referred to the appropriate department, and you will receive a direct response in due course.

Please note, if you need to contact us in the future, or need to inform us of a matter requiring immediate attention, you can now contact us via Webchat or on our Social Media channels which are available, 8am-11pm, 7 days a week.

[Get Social - Northern Ireland Water \(niwater.com\)](#)

You can also contact us by telephone on 03457 44 00 88, which is also available 24/7.

Yours Sincerely,

SHANNON DAVIS

Customer Service Centre

Should you need to contact us in the future, our contact details can be found on our website:

www.niwater.com/contact-us/

[Customer Care Register](#) - We offer a range of free additional services if you have a disability, are an older consumer, have a serious medical condition or need extra help for any other reason. Click [here](#) for more info about our Customer Care Register.

To find out more about our free Text Alert service, click on the link below to visit our website:

www.niwater.com/register-for-keeping-you-informed/

Details of our Complaints Procedure can be found online: www.niwater.com/complaints

Save time...
...do it online!

Help yourself to our Self Service Portal:

digitalservices.niwater.com

From: Emma Prior <eprior@mkoireland.ie>

Sent: 05 September 2025 19:42

To: waterline <waterline@niwater.com>

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>

Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
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MKO
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Business Park, Dublin, D12 XN9W

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Emma Prior

From: RSPB NIreland <rspb.nireland@rspb.org.uk>
Sent: Friday 24 October 2025 16:31
To: Emma Prior
Cc: Robert Kennedy; Thomas Blackwell
Subject: Re: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: Meenbog WF alterations RSPB response with appendices Oct 25.pdf

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Emma,

Thank you getting in touch and apologies for the delay in my reply. Please find our response attached.

Kind regards,
Conservation Officer (Planning)



RSPB Northern Ireland Headquarters

Belvoir Park Forest
Belfast
BT8 7QT

rspb.org.uk



Protecting habitats, saving species and helping to end the nature and climate emergency.

Nature is in crisis. Together we can save it.

The Royal Society for the Protection of Birds (RSPB) is a registered charity:
England and Wales no. 207076, Scotland no. SC037654.

From: Emma Prior <eprior@mkoireland.ie>

Sent: 05 September 2025 19:47

To: RSPB Nireland <rspb.nireland@rspb.org.uk>

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>

Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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mkoireland.ie | +353 (0)91 735 611



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MKO
Tuam Road
Galway
H91 VW84



24th October 2025

To whom it may concern,

Re: EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

The RSPB is Europe's largest voluntary nature conservation organisation and is supported by over 1 million members in the UK, around 12,500 of which reside in Northern Ireland (NI). As such we thank you for sending the above named consultation through to us for comment.

Due to limited capacity and high workload, we would refer back to our responses submitted in relation to the original application and our correspondence dated 01.03.2024. These are attached to this response for your convenience.

Please do not hesitate to contact the Conservation Officer with any related queries.

Yours faithfully

Conservation Officer

RSPB Northern Ireland

RSPB Northern Ireland
Headquarters
Belvoir Park Forest
Belfast
BT8 7QT

Tel: 028 9049 1547
Facebook: RSPBNI
Twitter: @rsbni
Instagram: rspb_ni
rspb.org.uk



The RSPB is part of BirdLife International, a Partnership of conservation organisations working to give nature a home around the world.

Planning Office
Derry City and Strabane District Council
98 Strand Road
Derry
BT48 7NN



1st March 2024

To whom it may concern,

Application Reference: LA11/2024/0100/DETEIA

Proposal: Meenbog Wind Farm

Location: Meenbog (and surrounding townlands), Co. Donegal

The RSPB is Europe's largest voluntary nature conservation organisation and is supported by over 1 million members in the UK, around 11,000 of which reside in Northern Ireland (NI). As such we thank you for sending the above named consultation through to us for comment.

Due to limited capacity and high workload, we would refer back to our responses submitted in relation to the original application. These responses are attached with the 2017 scoping response (LA11/2016/1055/TBA) in Appendix A and the 2018 response to the full application (LA11/2017/1134/TBA) in Appendix B. We would advise the applicant to pay particular attention to our comments in Appendix A which relate to peat.

Please do not hesitate to contact the Conservation Officer with any related queries.

Yours faithfully

Conservation Officer

RSPB Northern Ireland

RSPB Northern Ireland
Headquarters
Belvoir Park Forest
Belfast
BT8 7QT

Tel: 028 9049 1547
Facebook: RSPBNI
Twitter: @rsbni
Instagram: rspb_ni
rspb.org.uk



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Appendix A

DfI Strategic Planning Division
Clarence Court
10-18 Adelaide Street
Belfast
BT2 8GB

27 January 2017

Dear Sir/Madam

RE: intent to submit an Environmental Statement (ES) for a proposed wind farm at Carrickaduff, Meenbog and adjacent townlands, Co Donegal (LA11/2016/1055/TBA)

The RSPB is Europe's largest voluntary nature conservation organisation and is supported by over 1 million members, 13 000 of which reside in Northern Ireland (NI). As such we thank you for sending the above named consultation through to us for comment. Please find below our recommendations as to what we expect the Environmental Statement (ES) should contain as well as advice on data collection and surveys.

Please note that we do not manage any site specific data for the proposed site because of the location in the Republic. The content of this response is normally for a site in Northern Ireland. We recommend you contact Birdwatch Ireland (BWI) regarding the ornithological impacts of this proposal as they may possess more site specific data. We also recommend the agent contacts both the Northern Ireland Environment Agency (NIEA)¹ and the Northern Ireland Raptor Study Group (NIRSG)² for an up to date history of breeding raptors in the area. Of special interest may be peregrine falcon and merlin, both Annex 1 listed species under the EU Birds Directive 2009 (codified version)³. There may be species of conservation concern present including curlew, snipe, red grouse and meadow pipit, all of which are of a high or medium conservation concern (breeding populations) across Ireland⁴. We would expect these species to be carefully considered from the site location and design stage.

The Department for Infrastructure (DfI) can be contacted for any available data gathered from any other local wind farm developments⁵. RSPB data can be requested using the link below⁶ where

¹ [NIEA](#)

² [NIRSG](#)

³ [Birds Directive](#)

⁴ Colhoun, K. & Cummins, S. (2013): Birds of Conservation Concern in Ireland 2014-2019 *Irish Birds* 9:523-544

⁵ [Homepage | Planning NI](#)

⁶ [The RSPB: Mapping and GIS: Data requests](#)

access to other data sources can also be found such as the National Biodiversity Network Gateway (NBN)⁷ and the British Trust for Ornithology (BTO)⁸ through our website.

We would expect the ES to provide sufficient information to allow an assessment of the impacts of the proposed development on the environment, in accordance with The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2012⁹. Specific matters to be dealt with are listed below.

Sections one and two detail the survey work and analysis the RSPB feels are necessary to satisfy the requirements of the EIA Regulations, while section three considers the mitigation and enhancement options which could be provided.

1. Survey/desktop study recommendations

Site Designations

We advise that NIEA are contacted regarding nature conservation designations¹⁰ and to view the relevant Area Plans with regard to both statutory and non-statutory designations.

With regards to the location of Natura 2000 sites and connectivity between them and the proposed site, we recommend consultation with NIEA to ensure The Conservation (Natural Habitats, etc) NI Regulations 1995¹¹ are complied with.

Habitats

A full habitat survey should be carried out as part of the ES, at least to JNCC Phase 1 level. The identification of priority biodiversity habitats¹² is particularly important. In particular, active blanket bog is a priority habitat listed under Annex I of Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive). Blanket bog is composed of peat, which is a significant store of carbon as well having an important carbon sequestration role when it is in its active state. The principle aim of wind farm development is to reduce carbon dioxide emissions and combat global warming¹³. Serious consideration must therefore be given to whether the reduction in CO₂ emissions arising from wind farm developments justifies the potential reduction in the carbon storing properties of peatland. Analysis must also take into consideration any additional carbon arising from the projects, such as the manufacture, transport, construction and ongoing maintenance of the turbines and concrete bases¹⁴.

⁷ [National Biodiversity Network Gateway](#)

⁸ Such as The British Trust for Ornithology (BTO); [BTO](#)

⁹ [Planning Regulations](#)

¹⁰ [Protected Areas](#)

¹¹ [The Conservation Regulations](#)

¹² [Priority habitats](#)

¹³ Nayak, D.R. *et al* (2010): *Calculating Carbon Savings from Windfarms on Scottish Peatlands – A New Approach*

¹⁴ Scottish Government (2011): *Calculating Potential Carbon Losses & Savings from Wind Farms on Scottish Peatlands: Technical Note*

Methodologies

The RSPB is of the opinion that in order to satisfy Schedule 4 of the EIA Regulations, i.e. to describe the likely significant effects of the development proposal on the environment, the scoping report should give an indication of the survey methodologies that will be employed during the EIA process. These methodologies will vary according to the species concerned, and the RSPB reserves the right to make further comments once the developer has set out suggested methodologies for each species. We can give further advice on this matter, if required. The scoping document should therefore affirm that the EIA will include a full bird survey carried out at appropriate times of the year, employing stated methodologies and using a reputable ecological contractor. The surveys should cover not only the development site but also areas near the site that may be affected, either directly or indirectly, by the development.

It is vitally important that approved methodologies are employed, to ensure that the EIA glean all the information necessary in order that an informed view as to the existing nature conservation interest of the site can be reached. In the absence of this, uncertainties will be built into the EIA, which will mean that objections may be lodged to the application on the grounds of an inadequate EIA, and that those who wish to lodge objections may cite the precautionary principle. The need to re-survey the development site and vicinity may hold back the decision over the development proposal by as much as a year.

The following survey methods are therefore recommended for this site for *at least* one full year of survey. Depending on the outcomes of these surveys, another year may be required and should be planned for within the project timeline:

- A modified Common Bird Census (CBC) or a Brown & Shepherd (B&S) survey including non-wader observations, over the development site plus 500metre (m) buffer. These can both be done using transects to ensure even coverage, over three visits in specified date windows between mid-March to mid-July.
- Winter surveys using a B&S type survey (i.e. timed visits to specified area), repeated once per month between Oct - March inclusive, and again over the development site plus 500m buffer.
- Vantage point (VP) surveys conforming to Scottish Natural Heritage (SNH) guidelines¹⁵ and targeting raptors i.e. buzzards, that may be using the site/buffer should be considered. We recommend any surveyor (s) involved has experience of VP work and application of collision risk methodology.
- VP surveys conforming to SNH guidelines and targeting migratory waterfowl should be considered¹⁶. We recommend any surveyor (s) involved has experience of VP work for swans/geese.

¹⁵ <http://www.snh.gov.uk/docs/C278917.pdf>

¹⁶ Irish Whooper Swan Study Group (IWSSG); grahammcelwaine@btinternet.com

A transect CBC style survey will pick up records of most breeding waders. However, the B&S methodology can be used to identify breeding waders, where there is suitable habitat (i.e. in upland areas). All reports, field maps and field forms should be retained, even after a development proposal has gained consent, and should be viewed as being in the public domain.

The most up to date guidance available from SNH on surveys, monitoring and assessing the effects of windfarms can be found at the following locations:

- <http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/>
- <http://www.snh.gov.uk/docs/C278917.pdf>
- <http://www.snh.gov.uk/docs/C205417.pdf>
- <http://www.snh.gov.uk/docs/C205416.pdf>

The Scottish Government has developed a carbon calculator to help developers measure emissions savings associated with developments on peatlands using a full life cycle analysis approach. Details can be found below:

- <http://www.scotland.gov.uk/Topics/Business-Industry/Energy/Energy-sources/19185/17852-1/CSavings>

NIEA advocate Planning Policy Statement 18 Renewable Energy (PPS18)¹⁷ and have also developed the following advice note on active peat to help guide potential developments on peatland sites:

- <https://www.daera-ni.gov.uk/sites/default/files/publications/doe/natural-guidance-NIEA-natural-heritage-development-management-team-advice-note-2012.pdf>

In addition, the following peer reviewed papers discuss breeding bird distribution and foraging raptor activity on existing windfarms and report on both spatial and temporal disturbance levels to certain upland species:

- Pearce-Higgins, J. W et al. (2009): The distribution of breeding birds around upland windfarms: Effects of windfarms on upland breeding birds. *Journal of Applied Ecology* 2009, 46, 1323-1331
- Pearce-Higgins, J.W et al. (2012): Greater impacts of wind farms on bird populations during construction than subsequent operation: results of a multi-site and multi-species analysis. *Journal of Applied Ecology* 2012, 49, 386-394

We expect these papers to be used to help quantify the potential level of disturbance and loss of species post-construction from proposed sites and therefore aid the choice of suitable sites and

¹⁷ [PPS18](#)

areas of land, on or off-site, for successful habitat management. It is particularly relevant if breeding waders¹⁸ are on or near to a proposed site and/or foraging hen harriers or buzzards are present.

The cumulative impacts of this proposal with any nearby windfarms or other plans or projects, should also be assessed.

2. Analysis

The ES must provide an assessment of the possible impacts of the development on the interests described by the surveys. These possible impacts should include *inter alia* direct impacts, effects due to disturbance and indirect impacts.

The direct, physical impacts on the development should be addressed, including:

- collision risk,
- direct land-take by structures including masts, buildings, roads, tracks, fences and drainage ditches,
- disruption of hydrology, in terms of saturation on the down-slope sides of roads, tracks and drying-out on the up-slope sides,
- the creation of sumps through built development, with consequent saturation and desiccation effects, and
- works associated with the construction of the development, including vegetation and soil/peat removal and storage, borrow pits, temporary compounds etc.

Disturbance effects could arise in each phase of the development – construction, operation and decommissioning. Possible causes of disturbance are noise, vibration, dust, and the physical presence of construction equipment, perhaps providing predator vantage points, and the presence of personnel associated with construction and site security. The RSPB's concern centres on whether disturbance factors would result in birds being forced to relocate to sub-optimal habitats.

Indirect impacts may include:

- agricultural intensification arising from the increased accessibility of the development site and surrounding areas to stock due to construction of roads and tracks, and
- increased public disturbance due to the presence of those who wish the view the turbines from close up, and by virtue of increased accessibility.

3. Mitigation, enhancement and monitoring

Once sufficient information is available to conclude whether the development will have impacts on the site, adverse or otherwise, the ES should outline mitigation measures as appropriate.

¹⁸ Such as snipe and curlew

The broad headings under which the RSPB would be keen to discuss mitigation (without prejudice) would be:

- institution of agricultural management and access regimes which favour important bird species through habitat management and possibly habitat creation,
- time-related restrictions on construction in relation to nesting periods,
- precise location and orientation of built development within the development site, and
- removal of some tracks/roads after construction.

The RSPB advocates *no loss of biodiversity* to development, through appropriate mitigation and compensation where necessary. Finally, we would encourage suggestions on enhancing the biodiversity of the development site and its vicinity and would welcome the opportunity to discuss such concepts with the developer.

Both mitigation and enhancement may happen on or off-site. This can be facilitated through the local community or local landowners and can benefit local biodiversity whilst also providing services such as carbon storage or improved water quality¹⁹.

Monitoring should take place for all relevant species found on site (informed by the surveys). The “Before After Control Impact” approach should be used to add rigour to the process. The RSPB is of the opinion that survey and monitoring results should be published, in order to enhance understanding of the relationships between windfarms and biodiversity.

We reserve the right to make further representations in relation to this matter and if you require further information in relation to issues raised in this letter, please do not hesitate to contact the Assistant Conservation Officer.

Yours sincerely

Assistant Conservation Officer
RSPB Northern Ireland

¹⁹ [Futurescapes](#)

Appendix B

DfI Strategic Planning Division
Clarence Court
10-18 Adelaide Street
Belfast
BT2 8GB

05 February 2018

To whom it may concern,

RE: Application for a 19 turbine wind farm in the townlands of Meenbog, Croaghonagh and Cashelnavean, Co. Donegal (LA11/2017/1134/TBA)

The RSPB is Europe's largest voluntary nature conservation organisation and is supported by over 1 million members, 13 000 of which reside in Northern Ireland (NI). As such we thank you for sending the Environmental Statement (ES) for the above named consultation through to us for comment.

As the proposed development lies in the Republic, we recommend that the applicant consult our sister organisation Birdwatch Ireland (BWI) on the ornithological features of the area and the potential impacts of the proposal on these features as they may possess more site specific data.

We note the low number of hen harrier flights recorded across the site and the subsequent low collision risk for the species. However, without prejudice and should approval be granted, we recommend that the habitat of the proposed areas of tree felling in the vicinity of the turbine locations be managed according to the recommendations in the Scottish Natural Heritage (SNH) guidance "*Wind farm proposals on afforested sites – advice on reducing suitability for hen harrier, merlin and short-eared owl*"¹ to limit the suitability of the wind farm site for hen harrier and thus reduce the risk of collision.

Without prejudice and should approval be granted, we recommend the measures proposed within the ES² and the recommendation below be placed as planning conditions on any decision notice.

¹ Accessed on 01/02/18 at <https://www.nature.scot/sites/default/files/2017-09/Guidance%20note%20-%20Wind%20farm%20proposals%20on%20afforested%20sites%20advice%20on%20reducing%20suitability%20for%20hen%20harrier%20C%20merlin%20and%20short-eared%20owl.pdf>

² Section 7.6 Meenbog Wind Farm Environmental Impact Assessment Report.

Northern Ireland HQ
Belvoir Park Forest
Belvoir Drive
Belfast
BT8 7QT

Tel 02890 491547
Fax 02890 491669

rspb.org.uk

- Unavoidable vegetation clearance from within the site footprint shall occur outside of the bird breeding season which lasts from 01 March to 31 August to avoid disturbance to nesting birds.
- An independent and suitably qualified ornithologist shall be present on site if construction works are required from March to August of any year and operate a stop works authority should disturbance to breeding birds be detected. They should submit surveys to the Planning Authority as agreed to prior of any works commencing on site to avoid disturbance to breeding birds.
- Prior to the commencement of construction a final Hen Harrier Habitat Enhancement Plan shall be submitted and agreed in writing with the Planning Authority incorporating the measures detailed in Appendix 7.7 of the Environmental Statement. This plan should also include a comprehensive monitoring programme for the lifetime of the development.
- Prior to the commencement of construction a final Post-Construction Bird Monitoring Programme shall be submitted and agreed in writing with the Planning Authority incorporating the measures detailed in Appendix 7.8 of the Environmental Statement.

Please do not hesitate to contact the Conservation Officer with any related queries.

Yours sincerely

Conservation Officer
RSPB Northern Ireland

Northern Ireland HQ
Belvoir Park Forest
Belvoir Drive
Belfast
BT8 7QT

Tel 02890 491547
Fax 02890 491669

rspb.org.uk

Emma Prior

From: Wexford Receptionist <REC_WEX@epa.ie>
Sent: Monday 8 September 2025 10:18
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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A Chara,

Your correspondence on 06/09/2025 has been forwarded for attention. Tá do chomhfhreagras 06/09/2025 seolta ar aghaidh le haghaidh aird.

Le gach dea-ghuí

Grace Marshall

Duty Receptionist | Facility Management & Sustainability
Office of Communications and Corporate Services, Wexford
Fáilteoir ar Dualgas | Foireann Seirbhísí Eagraíochtúla
An Oifig Cumarsáide agus Seirbhísí Corparáideacha, Loch Garman



053-9160600 (Direct dial)

info@epa.ie

www.epa.ie



From: Emma Prior <eprior@mkoireland.ie>
Sent: Friday 5 September 2025 19:48
To: Wexford Receptionist <REC_WEX@epa.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

FAO Planning and Environmental Department

Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)

- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611



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Fangfei Zhang

From: salesenquiries (Customer Solutions) <salesenquiries@esbtelecoms.ie>
Sent: Wednesday 25 March 2026 15:51
To: Emma Prior; ESB Networks Customer Service (ESB Networks); salesenquiries (Customer Solutions); Corporate Communications (Strategy Innovation and Transformation)
Cc: Robert Kennedy; Thomas Blackwell; Karen O'Neill; Keelin Bourke
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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Hi Emma,

Sent to the relevant teams to review and respond directly should the need arise.

Thanks

Sylvester Cullen | Sales & Marketing Manager | ESB Telecoms Ltd | Mobile: +353 852956751 |
www.esb.ie/esbtelecoms

At ESB, we are committed to working flexibly, while also respecting our right to disconnect. While it suits me to email now, I do not expect a response or action outside your working hours.



From: Emma Prior <eprior@mkoireland.ie>
Sent: Wednesday 25 March 2026 15:21
To: ESB Networks Customer Service (ESB Networks) <esbnetworks@esb.ie>; salesenquiries (Customer Solutions) <salesenquiries@esbtelecoms.ie>; Corporate Communications (Strategy Innovation and Transformation) <corporatecommunications@esb.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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Please note that a minor amendment has been made to the site boundary, to account for the inclusion of habitat restoration land. The lands proposed for restoration measures will comprise two blocks of forestry, both located within the townland of Tievecloghoge. It is being proposed that the forestry within these blocks be felled and converted to peatland and scrub habitats. An updated map of the final planning application site boundary is attached.

We would welcome any comments that you might have in relation to the updated site boundary, alongside any other comments you may have relating to the original scoping document. If you could return comments or suggestions before April 1st, 2026, it would be much appreciated.

Kind regards,
Emma.

Emma Prior
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611



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From: Emma Prior
Sent: Tuesday 23 September 2025 15:09
To: esbnetworks@esb.ie
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

FAO Planning and Environmental Department

Dear Sir/Madam,

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If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Environmental Scientist

MKO

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Business Park, Dublin, D12 XN9W

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An timpeallacht? - Smaoinigh air sula bpriontáileann tú an r-phost seo.

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* * * * *

Tá an t-eolas sa ríomhphost seo agus in aon chomhad a ghabhann leis rúnda agus ceaptha le haghaidh úsáide an té nó an aonáin ar seoladh chuige iad agus na húsáide sin amháin.

Is tuairimí nó dearcthaí an údair amháin aon tuairimí nó dearcthaí ann, agus ní gá gurb ionann iad agus tuairimí nó dearcthaí ESB.

Má bhfuair tú an ríomhphost seo trí earráid, ar mhiste leat é sin a chur in iúl don seoltóir.

Scanann ESB ríomhphoist agus ceangaltáin le haghaidh víreas, ach ní ráthaíonn sé go bhfuil ceachtar díobh saor ó víreas agus ní glacann dliteanas ar bith as aon damáiste de dhroim víreas.

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* ** *** ** * ** *** ** * ** *** ** *

Fangfei Zhang

From: Environmental Co-ordination (Inbox) <Environmental_Co-ordination@agriculture.gov.ie>
Sent: Tuesday 31 March 2026 12:04
To: Emma Prior
Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment
Attachments: Meenbog windfarm Donegal March 2026.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

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Good afternoon,

Please see comments/observations attached from our Felling Division.

Regards,
Environmental Co-ordination Unit

From: Emma Prior <eprior@mkoireland.ie>
Sent: Wednesday 25 March 2026 15:16
To: Environmental Co-ordination (Inbox) <Environmental_Co-ordination@agriculture.gov.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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Emma.

Emma Prior
Environmental Scientist

MKO

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Business Park, Dublin, D12 XN9W

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611



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From: Emma Prior
Sent: Friday 5 September 2025 16:55
To: environmentalco-ordination@agriculture.gov.ie
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Kind regards,
Emma.

Emma Prior
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Business Park, Dublin, D12 XN9W



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Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid. D'fhéadfadh an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphost seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scríos gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.



MKO
Tuam Road
Galway
H91 VW84

31st March 2026

**Re: EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal.
Near the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower,
Cullionboy, Cashelnavean, Tawnawully and Friarsbush, Ballybofey, stranorlar and Donegal Town.**

Dear Sir/Madam,

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

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

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

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

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

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

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



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

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

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

and

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

Pp

Neil O'Brien
Higher Executive Officer
Felling Section



Emma Prior

From: Breandán Ó Baoill <bobaoill@donegalairport.ie>
Sent: Wednesday 25 March 2026 15:31
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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Dera Emma,

Thanks for the updated information on the Meenbog Wind Farm.

We don't have any comments to add.

Kind regards,

Breandán

| Breandán Ó Baoill | SATCO/ANS Safety Manager | Air Traffic Control | Donegal Airport |
| Carrickfinn, Kincasslagh, Co Donegal, F94 X2RH, Ireland |
| Tel: +353-74-9548284 Mob: +353-87-2938230 |



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From: Emma Prior <eprior@mkoireland.ie>
Sent: Wednesday 25 March 2026 15:18
To: Info Donegal <info@donegalairport.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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We would welcome any comments that you might have in relation to the updated site boundary, alongside any other comments you may have relating to the original scoping document. If you could return comments or suggestions before April 1st, 2026, it would be much appreciated.

Kind regards,
Emma.

Emma Prior
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

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From: Emma Prior
Sent: Friday 5 September 2025 17:14
To: info@donegalairport.ie
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

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The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

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Emma Prior

From: JOSEPH GALLAGHER <j.gallagher@donegalcoco.ie>
Sent: Thursday 2 April 2026 15:01
To: Emma Prior
Cc: Keelin Bourke
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Ms. Prior,

Thank you for your message. The County Donegal Heritage Office is part of the Culture Division and does not have the capacity to comment on individual planning applications. Any planning applications should be referred to the Planning Department of Donegal County Council for appropriate review and comment. Any proposals should be considered in light of the available heritage datasets and the statutory protections afforded aspects of the natural, archaeological, built, cultural or geological heritage. The statutory authorities should be contacted in relation to developments that may affect the natural, archaeological, built, cultural or geological heritage. The Donegal County Development Plan also sets out further measures to protect and conserve these heritage assets.

This correspondence should not be taken to constitute consultation with Donegal County Council on this proposed development. Thank you for your attention in this matter.

Kind regards,

Dr. Joseph Gallagher, FRGS
Heritage Officer, County Donegal Heritage Office,
Culture Division, Donegal County Council,
MacIntyre House, Letterkenny Road, Lifford, County Donegal

Telephone: (074) 917 2576

E-mail: heritage@donegalcoco.ie

Website: www.donegalcoco.ie/heritage



**Comhairle Contae
Dhún na nGall**
Donegal County Council



Ceangal

Clár den Chomhairle Oidhreachta
A Heritage Council programme

The Local Authority Heritage Officer Programme is a partnership with The Heritage Council

From: Emma Prior <eprior@mkoireland.ie>

Sent: 02 April 2026 14:53

To: JOSEPH GALLAGHER <j.gallagher@donegalcoco.ie>; JOSEPH GALLAGHER <j.gallagher@donegalcoco.ie>

Cc: Keelin Bourke <kbourke@mkoireland.ie>

Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

You don't often get email from eprior@mkoireland.ie. [Learn why this is important](#)

CAUTION: This email originated from outside of Donegal County Council. Do not click links or open attachments unless you recognise the sender and are sure that the content is safe.

Dear Mr. Gallagher,

I am following up on the below scoping request regarding a planning application for Meenbog Wind Farm, in County Donegal, on behalf of Planree Ltd.

Please note that a minor amendment has been made to the site boundary, to account for the inclusion of habitat restoration land. The lands proposed for restoration measures will comprise two blocks of forestry, both located within the townland of Tievecloghoge. It is being proposed that the forestry within these blocks be felled and converted to peatland and scrub habitats. An updated map of the final planning application site boundary is attached.

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Kind regards,
Emma.

Emma Prior
Environmental Scientist

MKO

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Business Park, Dublin, D12 XN9W

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From: Emma Prior

Sent: Friday 5 September 2025 17:29

To: j.gallagher@donegalcoco.ie; heritage@donegalcoco.ie

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>

Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Mr. Gallagher,

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Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

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[Clásal Séanta Ríomhphoist](#)

[Member of Cyber Ireland | Ireland's Cyber Security Cluster](#)

Emma Prior

From: Lagan, Fay (EXT) <Fay.Lagan@Eirgrid.com>
Sent: Wednesday 25 March 2026 15:34
To: Emma Prior; STATUTORY NOTIFICATIONS
Cc: Robert Kennedy; Thomas Blackwell; Karen O'Neill; Keelin Bourke
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment
Attachments: 20260205 Interim HV Guidance Version 2 - Final.pdf

You don't often get email from fay.lagan@eirgrid.com. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Thanks for the email. As you may be aware EirGrid has agreed an Engagement Protocol for UGC cables in public roads. While the Protocol is intended for EirGrid projects only, the Roads Sector and County Council may or may not refer to it in their consultation with you. A link is provided below for information only. We do not yet know how the recent Accelerated Infrastructure report (Action 21) will be implemented so the Engagement Protocol will remain in place for now.

<https://cms.eirgrid.ie/sites/default/files/publications/Electricity-Transmission-Infrastructure-Development-Roads-Sector-Engagement-Framework.pdf>

Attached to this email is a guidance document issued by the RMO to County Councils. It was issued to EirGrid for information and has had no input from us nor ESB.

Also, please be aware of EirGrid Powering Up the North West programme, which includes the Clogher-Srananagh project. [Powering Up The Northwest | Projects | EirGrid](#)

Best Regards,
Fay.

Fay Lagan | Aonad Pleanála agus Comhshaoil
EirGrid | Planning and Environment Unit
M: + 353 (0)86 169 3949

From: Emma Prior <eprior@mkoireland.ie>
Sent: Wednesday 25 March 2026 15:19
To: Info - EirGrid <Info@Eirgrid.com>; STATUTORY NOTIFICATIONS <StatutoryNotifications@Eirgrid.com>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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From: Emma Prior
Sent: Friday 5 September 2025 17:32
To: info@eirgrid.com
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
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EirGrid plc - Transmission System Operator, Ireland.
The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4, D04 FW28.

Oibrítheoir Eangach Leictreachais na hÉireann.
160 Bóthar Shíol Bhroin, Droichead na Dothra, Baile Átha Cliath 4, D04 FW28.

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Chief Executive:

Cathal Marley

Directors:

Brendan Tuohy CHAIR,

Tom Coughlan, James Nyhan, Rosa M. Sanz García (Spain), Ivan Schuster, Pauline Walsh, Deirdre Merriman, Aidan Guinan, Brian Donohoe

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Séanadh:

Tá faisnéis (agus/nó ceangaltáin) a d'fhéadfadh a bheith faoi phribhléid nó faoi rún sa teachtaireacht leictreonach seo. Tá an t-ábhar uile beartaithe a bheith d'úsáid an duine aonair nó an aonáin chuig a ndírítear é amháin. Sa chás nach tú an faighteoir beartaithe, bíodh fios agat go bhfuil cosc ar aon nochtadh, cóipeáil, dáileadh nó úsáid d'ábhair na teachtaireachta seo. Is iad tuairimí nó barúlacha an údair amháin na tuairimí nó na barúlacha a léirítear sa teachtaireacht seo, agus b'fhéidir nach ionann iad agus tuairimí nó barúlacha EirGrid. Má shíleann tú go bhfuair tú an ríomhphost seo trí earráid, cuir é seo in iúl don seoltóir láithreach le do thoil. Cé go scanann EirGrid ríomhphoist agus ceangaltáin, ní thugann siad ráthaíocht go mbíonn ceachtar acu saor ó víreas ná ní ghlacann siad aon dliteanas as aon damáiste a dhéantar de thoradh víreas.



An Roinn Iompair
Department of Transport

Interim Guidance to Road Authorities regarding the proposed placement of Medium or High Voltage electricity assets, including ducts, cables, and associated infrastructure under public roads

Version 2 Effective from XX/XX/2026

Document Control Sheet

Document Title	Status
Interim Guidance to Road Authorities regarding the proposed placement of Medium or High Voltage electricity assets, including ducts, cables, and associated infrastructure under public roads	Approved

Revision History

Version	Remarks	Prepared by	Approved by	Date
1.0	Issued under Circular RW 07 of 2025	Roads sector	DOT	14/3/2025
2.0	Revisions following feedback from stakeholders	Roads sector	DOT	4/2/2026

This document supersedes the 'Interim Guidance' issued to Road Authorities under 'Department of Transport Circular RW07 2025', 14th March 2025 and is applicable to projects from date of issue.

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1. Purpose and Scope

The purpose of this document is to provide interim guidance to Road Authorities in their role licensing road openings or making submissions to Planning Authorities regarding how the proposed placement of Medium or High Voltage infrastructure (i.e. infrastructure associated with cables used to transmit or distribute electrical energy at voltages greater than 1kV), interact with the public road network. Low Voltage Cables (1kV and less) should be dealt with using established licensing processes.

The primary function of the national, regional and local road network is the safe transportation of people, goods and services to all areas of the country. The maintenance and protection of the road network is the responsibility of the road authority. The installation of all utilities in the road network requires management and oversight by the road authority, to ensure the consistent application of standards, the protection of the network, and safe future road maintenance and improvement, whilst also facilitating and providing for future developments, as appropriate.

The 'Interim Guidance' has been developed to assist in the delivery of the grid infrastructure rollout by the energy sector while also seeking to mitigate impact and ensure the continued proper management of the road network. It is produced by the Roads and Transportation stakeholders including the Department of Transport (DoT), Transport Infrastructure Ireland and Road Authorities, and the Department acknowledges collaboration and input from all sectors.

The 'Interim Guidance' relates to rural roads only. Rural roads are defined as any public road with a speed limit greater than or equal to 60km/h. Urban Roads with a speed limit of less than 60km/h are to be addressed through existing established procedures, in consultation with the Road Authority.

The 'Interim Guidance' is issued *pro tem* until the development of any procedures for the planning, regulation, construction and management of Medium, or High Voltage cables under public roads.

The 'Interim Guidance' shall be read in conjunction with the DoT's Guidelines for Managing Openings in Public Roads (Purple Book) and TII's publication CC- PAV-04007- Requirements for the Reinstatement of Openings in National Roads.

Where the requirements of the 'Interim Guidance' cannot be complied with due to specific site circumstances, for example a concentration of existing utilities/ services beneath the public road or due to the approved consent for the installation of other utilities/ services, a site-specific solution will be required from the developer and/or ESNB having regard to the maintenance of existing or approved infrastructure for the

approval of the Road Authority.

The placement of ducts, cables and other items associated with Medium or High Voltage electrical assets and the roadworks required to carry this out is a complex area that is regulated under a number of pieces of legislation (including the Planning and Development Acts and Regulations, Roads Acts and various Electricity Acts), policy (Climate Action Plan), guidelines and decisions of the Commission for Regulation of Utilities (CRU), which together provide processes to authorise road openings and placement of this infrastructure.

This document does not:

- a) impose any obligation on any entity referred to in the text; or
- b) require any entity referred to in the text to act or not act in certain manner; or
- c) make any statement that gives or intends to give rise to a legitimate expectation to any party, whether referred to in the text or not, that the applicable entity referred to in the text will act or not act in a certain manner. The placement of cables in road is subject to the appropriate legislation and to the consent of, and conditions set by of the relevant authority.

Although every effort has been made to ensure the completeness and accuracy of its contents, users are advised to use the document carefully and no liability shall attach to the Minister for Transport for any errors or omissions in the document.

2. Other Relevant Documents

Climate Action Plan¹

The Climate Action Plan 2024, prepared under the Climate Action and Low Carbon Development Act 2015 as amended, sets a course for Ireland's emission targets by 2030 and reach net-zero no later than 2050. These national targets align with Ireland's obligations under EU and international treaties, most notably the Paris Agreement (2015) and the European Green Deal (2020). To accelerate renewable electricity generation which is to reach a target of 80% of electricity demand from renewable source by 2030, the Government has set the objective that:

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

Local Authorities, the Department of Transport (DoT) and Transport Infrastructure

¹ Climate Action Plan 2024

Ireland (TII) are committed to this objective.

Electricity Transmission Infrastructure Development - Roads Sector Engagement Framework²

This document, developed by the HV Forum in collaboration with DCEE, Eirgrid, ESBN, DoT, TII, RMO, LAs, and issued in May 2025 is applicable to all proposed Eirgrid/ ESBN high voltage transmission projects. It establishes clear and consistent engagement, consultation, and agreement protocols, between EirGrid, ESBN, and Road Authorities, for all EirGrid/ ESBN high voltage transmission network projects that have the potential to impact public roads.

Guidelines for Managing Openings in Public Roads (latest edition 2017)

This document sets out national standards for utility companies and roads authorities on excavating, backfilling, and reinstating road surfaces, ensuring consistency, safety, and minimizing disruption for all road users outside of National Roads. It standardises licensing, charging, materials, and procedures for roadworks, making processes transparent and efficient.

CC- PAV-04007- Requirements for the Reinstatement of Openings in National Roads

This publication sets out TII's specific requirements for excavating, backfilling, and reinstating openings (trenches) on Ireland's National Road Network.

3. Licence Notification and Application Process

3.1 Consent of the Road Authority

Applicants who wish to open a public road must have necessary powers to place MV/HV cables in the Public Road before they obtain consent to open the road. The following persons or bodies have powers to place MV/HV cables in the Public Road:

1. ESBN/ESB
2. EirGrid
3. Any person or body with site specific consent from the CRU under S.48 of the 1999 Electricity Regulation Act.
4. Any person or body with the agreement of every landowner who owns the substratum of the public road.

To open the road a person or body shall have the consent of the Road Authority and (in

² Interim Guidance & Engagement Framework

the case of a Motorway or Protected Road) the consent of the National Roads Authority (TII) under S. 53 of the 1993 Roads Act as amended.

Where an application for consent is made by persons or bodies 1-4 above this should be accompanied by evidence of their status as appropriate.

3.2 Planning Consent

Persons placing MV/HV cables in the Public Road must also have one the following:

- a) Consent of An Coimisiún Pleanála (ACP)
- b) Consent of the Planning Authority
- c) Demonstration of Exemption from planning consent

3.3 Who is the licence applicant and Licence Holder?

The asset owner unless they have an agreement to act on behalf of the asset owner.³

The following processes are as set out in the Guidelines for Managing Openings in Public Roads, Section 4, Road Opening Licences and Procedures.

3.4 Pre-Application Engagement for T1 Notification(s) or Planning Application

An applicant should have a level of certainty as to whether a particular licence will be granted and what conditions could apply to it. The preferred approach as far as possible should be that the Road Authority's requirements are known in advance of any submission to An Coimisiún Pleanála, ACP, the Planning Authority or application for a road opening licence.

The engagement with the road authority should discuss and agree the route for the MV/HV Cable(s) to identify/agree the routing 'optimal solution' along with other potential requirements for traffic management, times of work, reinstatement, positioning of chambers/ joint boxes etc.

Should the optimal solution utilise the road network wherever possible, joint box structures, link boxes and C2 chambers are to be located off the carriageway in verges, open spaces, or adjacent sites. Wherever possible at least single lane traffic should be maintained, including provision of temporary passing bays as required.

Whilst each project will be assessed on its own merits, save for exceptional circumstances, high/medium voltage underground cables should not be sited on or attached to existing roads structures, masonry bridges/ culverts and the like. Such

³ Such application may utilise the Applicant Manager feature of MRL Road Licensing software

structures require more complex maintenance intervention and upgrading that would be compromised by the proximate presence of live high/ medium voltage systems.

A Road Authority should have regard to section 5 and 6 below in developing interactions and responses for planning processes and road opening licencing.

Where this engagement has occurred and there is agreement in principle, the information can be provided by the developer of network or generation assets to third parties (the DSO, TSO, ACP, CRU etc.) to indicate the Road Authority's requirements for a future road opening licence or planning application. It will also assist in the development of subsequent supporting activity including geotechnical investigations.

It should be noted that this engagement gives no authorisation to open the road, nor does it reserve a route or create an easement. The Pre-Application Engagement, including the agreement in principle, does not protect any route. The time from Pre-Application Engagement to construction may be lengthy and other licences may be applied for by other energy sector applicants or other utilities along the route during that time. Where a new Pre-Application Engagement is sought on a road that has already a Road Opening Licence or a previous Pre-Application Engagement from a different developer, the applicant is required to consult with the previous developer/ licence holder as appropriate to coordinate the route and road space.

3.5 Road Opening Licence Applications (T1 Notifications & T2 Licences)⁴

3.5.1 T1 Notification and Permitting

For all HV and MV road opening applications the following process applies:

When the necessary powers are in place, as described at 3.1, an applicant shall issue a T1 notification for all HV / MV Cables installations in the Road.

- a) The road Authority should proactively engage with all electrical asset owners or developers through the T1 notification process.
- b) It should only grant a licence (T2, T2', T3) to an applicant who has the necessary powers to place MV/HV cables in a road, as described at 3.1.
- c) It should not grant a licence that significantly compromises the road structure, routine maintenance, or planned improvements of the road. Examples of this include obstruction of planned future drainage, creation of instability in embankments, obstructing the maintenance of bridges, restricting planned horizontal / vertical alignment of the road effecting the electrical properties of

⁴ See also 4.2.1 of the Guidelines for Managing Openings in Public Road

the MV/HV cable or impacting current and future planned road crossings for services.

- d) The applicant may make site specific proposals to address items raised at item 'c' above.
- e) Agreement following a T1 notification is normally valid for one year, however this can be extended by further agreement. Where necessary a second T1 may be required.

3.5.2 T2 Licence Applications (following the T1 Process)

The applicant shall apply for the appropriate road opening licences to facilitate construction of the electrical cable and associated infrastructure (as “child T2s” of a T1).

- It should be expected that multiple T2s can be required to manage, and sequence works, particularly where cable lengths run more than a few kms or in significantly different traffic environments.
- The extent of works carried out under a T2 should be manageable for both the licence holder and the Road Authority and should normally allow for inspection in one site visit. Typically, this will be limited to 2km lengths unless agreed otherwise by the Road Authority.
- Sectional completions for all work elements are necessary before commencing subsequent or adjacent sections.
- Licensing charges should be applied in accordance with the national process set out in the Purple Book Guidelines including invoicing and payment of:
 - Application charges at application stage
 - Reinstatement deposit prior to licence granting
 - Specific charges prior to licence granting
 - Long Term Impact Charges at T5 stage
 - Refund of deposits upon satisfactory inspection of the works at licence closeout

3.5.3 Opening the road for geotechnical/ site investigations:

A Road Authority may also grant T1 or T2 licences as appropriate to facilitate geotechnical and site investigation works. The licencing consent process for excavation of the public road is sufficient for these works only.

3.6 The Planning Process

Certain HV/MV cabling and associated infrastructure in the public road are required to obtain consent through the planning process. It is essential that the Road Authority makes its submission to the Planning Authority or An Coimisiún Pleanála (ACP) as appropriate during this process. The submission should:

- a) Be consistent with the conditions of any agreement in principle reached at Pre-Application Engagement for T1 Notification (see 3.4)
- b) Have regard to minimum requirements for a T1 (and Child T2s) (see Table 3.7 below).
- c) Require adherence to the processes set out in the Guidelines for Managing Openings in Public Roads, published by the Department of Transport and administered by the Road Authority and the Road Management Office.

3.7 Minimum Requirements for a T1 (and child T2s)

When permitting a road opening, a Road Authority must be able to control the following aspects of the roadworks:

- the periods during which and the times at which roadworks shall or shall not be carried out;
- the period within which roadworks shall be completed;
- the manner in which roadworks shall or shall not be carried out;
- requirements and standards in relation to the temporary or permanent reinstatement; and
- requirements in relation to the control of traffic in the vicinity of roadworks.

Additionally, it should not permit anything that shall significantly compromise the road structure, routine maintenance or planned improvements of the road (see 3.5.1).

The areas in the following Table 3.7 shall be considered in the T1 process / Pre-Application Engagement before T1 Notification(s) or Planning Application to set minimum interim requirements necessary under a T1 and any subsequent T2(s). These interim requirements will be updated through ongoing engagement with the Electrical Sector.

Table 3.7 Minimum Requirements and Considerations for Pre Engagement and T1 License Applications

Area	Condition	Reason
Depth and Alignment	10kV and 20kV cables in the public road network: The depth of cover to the top of duct containing the conductor should be a minimum of 750mm. This applies in all road classes and in verges, footpaths, cycleways, and carriageways. 1. Where a communication duct is provided the minimum depth to that duct shall be in accordance with the Guidelines for Managing Openings in Public Roads (600mm / 750mm as appropriate). Adequate access for compaction and spacing of ducts should be maintained. 2. The duct surround material should be ESNB approved sand surround or as per Guidelines for Managing Openings in Public Roads and agreed with the road authority. 33kV cables in the public road network: 1. 33kV are typically collector networks for generation sites. It is understood that these will remain an asset of the developer (the generation site) and will not be taken in charge by the network operators. These installations are to be treated as HV installations and are therefore to meet the requirements for HV Cables, as set out below. High Voltage Cables (i.e. greater than 35kV) 1. The depth of cover to the top of duct containing the conductor should be a minimum of 950mm. This applies in all road classes and in verge and all locations within the 'road'. 2. Where a communication duct is provided the minimum depth to that duct shall be in accordance with the Guidelines for Managing Openings in Public Roads (600mm / 750mm as appropriate). Adequate access for compaction and spacing of ducts should be	To ensure adequate depth of compacted suitable backfill material above the cable along its entire length and to provide due consideration to road drainage, other utilities, and future pavement maintenance.

Area	Condition	Reason
	maintained. 3. The duct surround material may be ESN approved sand surround or as per Guidelines for Managing Openings in Public Roads and agreed with the road authority. 4. Should a Cement Bound Granular Material (CBGM) or similar be used as an alternative to an ESN approved sand surround for the communications duct(s), a minimum depth of cover to the top of the communications duct of 950mm should also be maintained. Relevant to all MV and HV cable installations: 1. Trench width, backfilling and reinstatement of excavations to be in accordance with the DOT's Guidelines for Managing Openings in Public Roads and in the case of National Roads, TII's publication CC-PAV-04007 "Requirements for the reinstatement of Openings in National Roads". A minimum trench width of 450mm applies in all circumstances. 2. Should a local authority receive an application for the installation electricity cables in public roads, which includes a specification that is inconsistent with the above standards (e.g. surround material), they should bring this to the attention of the Road Management Office (contact@rmo.ie). 3. Additional ground improvement measures may be required, derived from the site investigations carried out. 4. The depth of cover to MV and HV cables and telecommunications ducts should be as set out above unless agreed otherwise in specific circumstances. 5. The alignment of the MV and HV cables and communications ducts must be agreed with the Road Authority at the earliest possible opportunity.	

Area	Condition	Reason
Ground Conditions	Ground conditions along the route of the cable to be comprehensively assessed through detailed site investigations. This should occur pre-licence application and may be the subject of a separate licence application. Where a Local Authority has a particular concern regarding ground water movement additional investigations or drainage measures may be required.	To verify that the identified reinstatements are fit for purpose and ensure integrity of road base.
Reinstatement	Backfilling and reinstatement of excavations to be in accordance with the DOT's Guidelines for Managing Openings in Public Roads and in the case of National Roads, TII's publication CC-PAV-04007 "Requirements for the reinstatement of Openings in National Roads". Additional ground improvement measures may be required, derived from the site investigations carried out.	To minimise future interventions of the road and maintain structural integrity of the host road.
MV and HV Electrical Infrastructure on or under Road (joint boxes, chamber lids etc)	Where joint box structures are proposed to be constructed in carriageways it shall be demonstrated that no off-carriageway alternative is practical. Link boxes and C2 chambers should be installed off the carriageway. The following are applicable unless alternative options are agreed based on particular needs and conditions: • Depth of cover to any joint box structures should be no less than 600mm unless agreed otherwise. • For joint box structures that interface with national roads, Technical Acceptance shall be carried out in accordance with the requirements of DN-STR-03001 – Technical Acceptance of Road Structures on Motorways and other National Roads. In this case,	To ensure the structural integrity and durability of structures and to mitigate the risk of differential settlement and reflective cracking to road surface.

Area	Condition	Reason
	contact must be made with the TII Structures Section in the early phases of the project. • Technical Acceptance of joint box structures beneath regional and/or local roads and which do not interface with national roads should be carried out in accordance with DOT Circular RW 10/2021. Integral to the Technical Acceptance procedure is the: ○ Technical Acceptance Report (TAR) which records the agreed basis and criteria for the detailed design of the joint box structure; and ○ Certification by the Design/Assessor/Checker confirming that the design, assessment, specification or construction works complies with the TAR. • Joint Box structures within the 'Road' shall conform to standards required by the Roads Authorities and should have a concrete lid unless exceptional circumstances and agreed otherwise.⁵ • Construction shall be in accordance with relevant DoT/TII publications. • All backfill around these structures to be placed and compacted in accordance with the Guidelines for Managing Openings in Public Roads and/or the TII document "Requirements for the Reinstatement of Openings in National Roads CC-PAV-04007" as a minimum. • Responsibility for the maintenance of Link Box / chamber lids remains with the Asset Owner or their successors.	

⁵ Joint boxes located outside the carriageway on regional and local roads do not require a concrete lid unless specifically required by the Road Authority in certain situations.

Area	Condition	Reason
Roads Structures	Whilst each project will be assessed on its own merits, save for exceptional circumstances, high/medium voltage underground cables should not be sited on or attached to existing roads structures, masonry bridges / culverts and the like. Such structures require more complex maintenance intervention and upgrading that would be compromised by the proximate presence of live high/ medium voltage systems. Where the Licence Holder discovers or damages uncharted services or drainage infrastructure including culverts, the Road Authority must be consulted, and agreement reached in advance of proceeding.	To preserve the structural integrity and durability of existing road structures.
Roads Drainage	Cable location and alignment should be designed/installed/constructed in such a manner to not obstruct or interfere with road drainage systems and road existing drainage pathways. Consideration to be given to future necessary expansion for climate adaptation, where envisaged as necessary by the Road Authority.	To ensure that the drainage systems in the host road are not compromised.
Records & Safety File	The licence holder shall provide as built details of all electrical infrastructure constructed in a format agreed with the Road Authority. Consideration should be given to ISO 19650 The Licence Holder shall provide a copy of the Safety File for the project.	To ensure the Road Authority can carry out its functions under the 1993 Roads Act.
Management procedures	Prior to licence issuing, the licence holder shall agree procedures for the construction, operation and maintenance of the electrical infrastructure including emergency procedures (including contacts) during the operational lifetime of the asset.	In the interest of health and safety and in the interest of protecting the road and the electrical infrastructure.

Area	Condition	Reason
Restrictions	Prior to issuing of a licence the applicant shall declare and agree with the Road's Authority any restrictions of future construction work in the vicinity of the electrical infrastructure.	In the interest of health and safety and in the interest of the protecting the road and the electrical infrastructure.
Existing Services	Cable location and alignment to be designed in such a manner to not obstruct or interfere with existing utilities, without prior agreement from the existing utility owners. The Applicant shall consult with each utility with existing services in the road prior to the submission of a T2 licence application.	To ensure that the utilities in the host road are not compromised.
Abnormal Load Requirements	A detailed submission of loads and proposed routes to be used for transportation of abnormal loads and exceptional abnormal loads along with details of the load is to be submitted to Road Authority for agreement in advance of planning consent or granting of a licence. The applicant may be required to undertake an assessment to determine the loading that a given structure can carry using standards including AM-STR-06048 and AM-STR-06026. See Circular RW18 / 2024 & S.I. No 366 of 2008 & S.I. No 5 of 2003	To preserve the structural integrity and durability of pre-existing road structures, pavements and existing utilities.
Construction Programme	A draft construction programme setting out timelines for: • construction of the ducting • construction of joint chambers • transport of cabling • pulling of cabling • jointing of cabling Should be submitted for the approval of the Road Authority.	To minimise disruption to road users. To coordinate other roadworks.

Area	Condition	Reason
Traffic Management	All traffic management to be in accordance with the Chapter 8 of the Traffic Signs Manual. The number of Traffic Management setups and programme to be pre-approved by the Road Authority and taking due consideration of traffic volumes, and to minimise the number and sequencing of Traffic Management set-ups along the host road. This should include a detailed traffic study of all roads and junctions including diversion routes impacted by the proposed works.	To minimise disruption to road users.
Communications	The Applicant shall have regard to the construction of any other infrastructure and coordinate with that person the timing of their works and the future maintenance of their infrastructure.	To minimise disruption to road users. To coordinate other roadworks.
Ownership	The applicant shall provide the Road Authority with contact details of the owner of the infrastructure annually throughout its life or when any changes in ownership occur. All electrical installations on the public road should be registered on Dial Before you Dig. This should include ownership and emergency contact details, and these details should be upgraded whenever changes occur.	In the interest of health and safety and in the interest of protecting the road and the electrical infrastructure.
Future infrastructure development	a. The applicant shall not install infrastructure (including structures, cables, or wires) along an existing Public Road where it is known that this Public Road is to be abandoned. b. The provision of infrastructure (including structures, cables, or wires) along the alignment of a future Public Road shall be coordinated with the construction of that road.	To minimise economic cost and cost to the exchequer.

Area	Condition	Reason
Security	The applicant shall provide the Road Authority with a cash security to ensure the satisfactory reinstatement of the public road.	To ensure the satisfactory reinstatement of the public road and that the works do not create a hazard or potential hazard or interfere with the maintenance of the public road.
Certification, coordination and Inspection	The applicant shall agree arrangements with the Road Authority for certification and inspection of the works that may include direct inspection / coordination by the Road Authority. The Road Authority may include specific charges for same.	To ensure the satisfactory reinstatement of the public road and that the works do not create a hazard or potential hazard or interfere with the maintenance of the public road.

4. Checklist

No.	Item	Note
1.	Ensure that the Applicant Organisation is correct	Where electric cables are planned in the public road, the Applicant for Planning Permission or a Road Opening licence shall be: 1. ESNB/ESB 2. EirGrid 3. Any person or body with site specific consent from the CRU under S.48 of the 1999 Electricity Regulation Act. 4. Any person or body with the agreement of every landowner who owns the substratum of the public road. Engagement with contractors is not recommended unless they have an agreement to act on behalf of the cable owner.
2.	Requirement for Planning Permission	The applicant should be required to provide evidence that either: - Planning permission exists for the development or - The development is exempted from planning
3.	Ensure Pre-Planning / Pre- Licensing Engagement has occurred	The applicant should engage with the Road Authority in advance of submission of a planning application or T1 notification.
4.	Ensure that certain minimum information is provided by the applicant.	At T1 stage and Planning permission stage the following information is typically required from the applicant - Summary of scope of the project - Applicant point of contact - Summary and mapping of the works to be included in each T2 - Report on current condition of the road - Report on Geotechnical/ site Investigation highlighting any challenging conditions. - Details of Bridges, culverts, watercourses, bog rampart roads and Special Engineering Difficulties affected and proposed design in those areas. - Reinstatement details including clear communication of full bay/ lane/ road reinstatement. - Details of any locations where roadworks (or temporary traffic management) are proposed outside normal working hours.

No.	Item	Note
		- Details of any alternative techniques including directional drilling.
5.	Consider the effect of the proposed works on existing assets and future development	Primary items for consideration: - the sterilisation effect of cables on the road - restrictions on future horizontal / vertical alignment of the road due to separation distances - Current and future drainage (including climate adaptation) - Current and future road crossings for services or drainage
6.	Consider the effect of ancillary activities.	Consideration at planning and road licensing stage requires the applicant to provide details of: - Site Compounds and storage areas - Transport routes for excavation import/export - Transport routes and weights for abnormal loads including cable reels. - Draft programme and temporary traffic management for cable pulling and cable jointing works.
7.	Point of contact	At every stage of the process, apply conditions to Planning Permissions and Road Opening Licences to ensure that the Road Authority has construction and out of hours / emergency contact details and knows the owner(s) of the cable/duct asset for: - Pre-Construction Stage - Construction Stage - Post construction for the life of the assets.
8.	Road Authority Resources & charges	Ensure that appropriate Road Authority resources are assigned to: - consideration of planning and road opening applications - inspection and co-ordination of works Where dedicated staff resources are required for the construction phase, appropriate specific charges should be applied to licences.

5. Terminology

The following terms are used in this document and in the industry. A brief, non-legal, explanation of these terms is set out below:

- **TAO:** Transmission Asset Owner - Electricity Supply Board (ESB)
- **An Coimisiún Pleanála, ACP:** see
- **DAO:** Distribution Asset Owner (ESB)⁶
- **TSO:** Transmission System Operator (EirGrid)
- **DSO:** Distribution System Operator (ESBN)⁷
- **Generator:** A person who holds a licence to generate electricity, see [Electricity generation | CRU.ie](#)
- **Storage Provider:** A person who provides a service of deferring the final use of electricity to a moment later than when it was generated or converts electrical energy into a form of energy which can be stored, the storage of such energy, and the subsequent reconversion of that energy into electrical energy.
- **Contestability:** Allows a party to construct connection assets that connect them to the transmission or distribution system.⁸
- **Non-contested Connection:** Those aspects of a connection to the electricity network constructed by the DAO or TAO.⁹
- **Direct Line Permission:** Permission to construct an electric line to carry electricity for the purpose of supply, not connected to the transmission system or distribution system when initially constructed.
- **Carriageway:** That portion of a road which is provided primarily for the use of vehicles. It refers to the paved, central part of the highway designed for driving and includes designated lanes such as bus lanes and cycle lanes. The carriageway excludes hard shoulders and hard strips.
- **Road:** From boundary-to-boundary, encompassing the entire area between the physical or legal limits, such as fences, hedges, or walls on either side. This includes the carriageway, footpaths, cyclepaths, hardshoulders, verges, and banks.
- **HV Forum:** A group of public sector stakeholders in the Electricity and Roads Transportation areas who were tasked with developing guidance to support the accommodation of Transmission HV Underground Cables (“HV UGC”) in roads for the Transmission Network.

⁶ Distribution Asset Owner Licence.docx

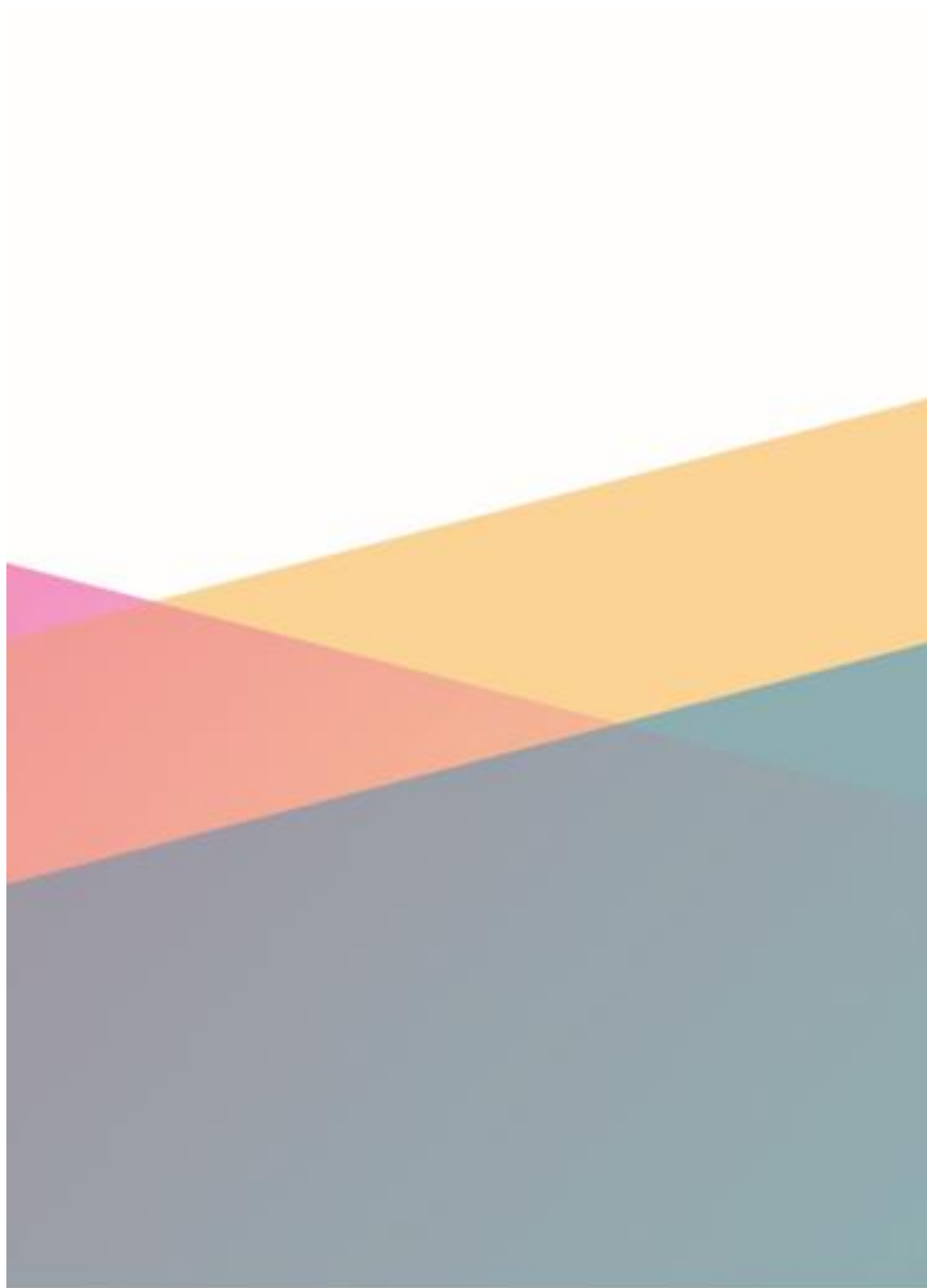
⁷ Information about the DSO

⁸ Contestability Paper 2007

⁹ General Conditions of Connection and Transmission Use

- **LV, MV, and HV Cables:** Defined by IEC (International Electrotechnical Commission) and CENELEC (European Committee for Electrotechnical Standardization) standards as:
 - LV is less than or equal to 1KV (1,000 volts)
 - MV is greater than 1KV and less than or equal to 35KV
 - HV is greater than 35KV
- **A CRU authorisation:** An authorisation granted to a person under S.16 of the 1999 Electricity Regulation Act to construct or reconstruct a generating station.¹⁰
- **T1 Notification:** The T1 is not a licence. It is notification of intent to perform works of high impact due to extent or complexity. The notification is to allow adequate time for consultation, determination, coordination and joint planning between applicant and authority in relation to subsequent licence(s).
- **Child T2 licence(s):** Applied for subsequent to the T1 may be subject to reduced approval and works programme notification periods than normal T2(s).
- **T2 Licence:** An application to carry out works of moderate impact due to the location, extent, amount or duration of the work. A T2 licence requires time for approval and works notification unless preceded by a T1 when these periods may be reduced.
- **T3 Licence:** An application to carry out works of low impact due to the location, extent, amount or duration of the work. A T3 licence requires a short application period and does not require a works programme notification.
- **T4 Notification:** A notification of emergency works (as defined under legislation). Notification must occur at the time or as soon as possible after commencement and works must be carried out during a limited time period. This notification fulfils the requirements of legislation and these guidelines when followed by a T5. Once the emergency is addressed on site, a T2 or T3 licence may be subsequently required to complete works that are not of an emergency nature.
- **T5 Notification:** A notification of completion of works carried out under T2, T3 or T4.

¹⁰ Licences | CRU.ie



Fangfei Zhang

From: DCEE Planning Notifications <PlanningNotifications@dcee.gov.ie>
Sent: Friday 24 April 2026 12:41
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment
Attachments: 26_63 Meenbog Windfarm Co Donegal.pdf

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Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Emma,

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

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

Kind regards,
Luke Thompson

Luke Thompson, Administrative Officer
Planning Advisory Section

An Roinn, Aeráide, Fuinnimh agus Comhshaoil
Department of Climate, Energy and the Environment

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

M +353 (0)87 336 7599
luke.thompson@dcee.gov.ie

From: Emma Prior <eprior@mkoireland.ie>
Sent: Wednesday 25 March 2026 15:19
To: DCEE GSI Planning <GSIPlanning@GSI.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>; Patricia Smullen (DCEE) <Trish.Smullen@gsi.ie>
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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Dear Sir/Madam,

I am following up on the below scoping request regarding a planning application for Meenbog Wind Farm, in County Donegal, on behalf of Planree Ltd.

Please note that a minor amendment has been made to the site boundary, to account for the inclusion of habitat restoration land. The lands proposed for restoration measures will comprise two blocks of forestry, both located within the townland of Tievecloghoge. It is being proposed that the forestry within these blocks be felled and converted to peatland and scrub habitats. An updated map of the final planning application site boundary is attached.

We would welcome any comments that you might have in relation to the updated site boundary, alongside any other comments you may have relating to the original scoping document. If you could return comments or suggestions before April 1st, 2026, it would be much appreciated.

Kind regards,
Emma.

Emma Prior
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

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From: Emma Prior
Sent: Friday 5 September 2025 17:37
To: DECC GSI Planning <gsiplanning@gsi.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Patricia Smullen (DECC) <trish.smullen@gsi.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Ms. Smullen,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior

Graduate Environmental Scientist

MKO

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Business Park, Dublin, D12 XN9W

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Emma Prior
MKO
Tuam Road
Galway, H91 VW84

30 March 2026

Re: EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co Donegal - Minor Amendment
Your Ref: 240505
Our Ref: [c.f. 25/144, 24/18, 21/292]

Dear Emma,

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

With reference to your email received on the 25 March 2026, concerning the EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co Donegal - Minor Amendment, we recommend using our various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. For more detailed information on how to access this data please access 'Data and Maps' [Data & Maps \(gsi.ie\)](#) on our 'Geoscience for planning' webpage. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution).

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

Land and soils <i>Soil</i> - Subsoils (Quaternary Geology) - Tellus Geochemistry - Geotechnical <i>Geology</i> - Bedrock - Geophysics - Bedrock & Quaternary 3D	Water <i>Groundwater</i> - Aquifers GW vulnerability, GWPSs (GWPPs) <i>Surface water</i> - Tellus Geochemistry <i>Estuarine & marine waters</i> - Marine and coastal <i>Flooding</i> - GWClimate - Karst	Climate Change <i>Carbon accounting / Carbon balance</i> - Geothermal - Carbon capture and storage <i>Climate change trends</i> - National coastal change assessment
Cultural Heritage <i>Archaeology</i> - Cherish <i>Underwater Archaeology</i> - Shipwrecks	Material Assets <i>Built Services</i> - Natural resources (Minerals & Aggregates) - Active quarries	The Landscape <i>Landscape Appearance & Character</i> - Physiographic units <i>Historical landscapes</i> - Historic mines
Other Relevant Data		
<i>Natural (Geo) hazards</i> - Landslide Susceptibility Mapping - Groundwater flooding - Coastal vulnerability - Subsidence - Radon	<i>Natural heritage</i> - Geoheritage (County Geological Sites) - Dimension Stone/Stone Built Ireland	



Other Comments

Please note that Geological Survey Ireland have no further comments or observations to make since our last response 24/18.

If we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Dr. Clare Glanville
Senior Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

Trish Smullen
Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

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



Emma Prior
MKO
Tuam Road
Galway, H91 VW84

10 September 2025

Re: EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co Donegal

Your Ref: 240505

Our Ref: 25/144 [c.f. 24/18, 21/292]

Dear Sir/Madam,

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

With reference to your email received on the 05 September 2025, concerning the EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co Donegal, we recommend using our various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. For more detailed information on how to access this data please access 'Data and Maps' [Data & Maps \(gsi.ie\)](#) on our 'Geoscience for planning' webpage. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution).

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

Land and soils <i>Soil</i> - Subsoils (Quaternary Geology) - Tellus Geochemistry - Geotechnical <i>Geology</i> - Bedrock - Geophysics - Bedrock & Quaternary 3D	Water <i>Groundwater</i> - Aquifers GW vulnerability, GWPSs (GWPPs) <i>Surface water</i> - Tellus Geochemistry <i>Estuarine & marine waters</i> - Marine and coastal <i>Flooding</i> - GWClimate - Karst	Climate Change <i>Carbon accounting / Carbon balance</i> - Geothermal - Carbon capture and storage <i>Climate change trends</i> - National coastal change assessment
Cultural Heritage <i>Archaeology</i> - Cherish <i>Underwater Archaeology</i> - Shipwrecks	Material Assets <i>Built Services</i> - Natural resources (Minerals & Aggregates) - Active quarries	The Landscape <i>Landscape Appearance & Character</i> - Physiographic units <i>Historical landscapes</i> - Historic mines
Other Relevant Data		
<i>Natural (Geo) hazards</i> - Landslide Susceptibility Mapping - Groundwater flooding - Coastal vulnerability - Subsidence - Radon	<i>Natural heritage</i> - Geoheritage (County Geological Sites) - Dimension Stone/Stone Built Ireland	



Other Comments

Please note that Geological Survey Ireland have no further comments or observations to make since our last response 24/18.

If we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Dr. Clare Glanville
Senior Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

Trish Smullen
Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

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

Fangfei Zhang

From: Adam Gargan <adam.gargan@hse.ie>
Sent: Friday 10 April 2026 09:59
To: Emma Prior
Cc: Finan Gallagher; Emer McShea; Eve Smith
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment
Attachments: NEHS Response Meenbog Windwarm.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

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Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good morning,

Please see the attached response with regard to Meenbog windfarm, Co. Donegal.

Kind Regards

Adam Gargan
Oifigeach Sláinte Comhshaoil | Environmental Health Officer

Seirbhís Sláinte Comhshaoil, Ospidéal Pobail Dhún na nGall, Drumlonagher, Baile Dhún na nGall, Co Dún na nGall, F94 V670.
Environmental Health Service, Donegal Community Hospital, Drumlonagher, Donegal Town, Co Donegal, F94 V670.

0871660324 | 074 91 23759 | adam.gargan@hse.ie



From: Emma Prior <eprior@mkoireland.ie>
Sent: Wednesday 25 March 2026 15:19
To: Environmental Health <environmental.health@hse.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

I am following up on the below scoping request regarding a planning application for Meenbog Wind Farm, in County Donegal, on behalf of Planree Ltd.

Please note that a minor amendment has been made to the site boundary, to account for the inclusion of habitat restoration land. The lands proposed for restoration measures will comprise two blocks of forestry, both located within the townland of Tievecloghoge. It is being proposed that the forestry within these blocks be felled and converted to peatland and scrub habitats. An updated map of the final planning application site boundary is attached.

We would welcome any comments that you might have in relation to the updated site boundary, alongside any other comments you may have relating to the original scoping document. If you could return comments or suggestions before April 1st, 2026, it would be much appreciated.

Kind regards,

Emma.

Emma Prior

Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin

mkoireland.ie | +353 (0)91 735 611

From: Emma Prior

Sent: Friday 5 September 2025 17:39

To: environmental.health@hse.ie

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>

Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,

Emma.

Emma Prior

Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin

mkoireland.ie | +353 (0)91 735 611

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"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil. Seains gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhíse ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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If this email has been received by you in error we would be grateful if you could immediately notify the ICT Service Desk by telephone at [+353 818 300300](tel:+353818300300) or by email to service.desk@hse.ie and thereafter delete this e-mail from your system"



Seirbhís Sláinte Comhshaoil

Clinic Contae,
Campas Ospidéal Naomh Conal,
Leitir Ceanainn, Co. Dhún na nGall
F92 FW6Y

Environmental Health Service

County Clinic, St Conal's Hospital Campus,
Letterkenny, Co. Donegal
F92 FW6Y

www.hse.ie
finan.gallagher@hse.ie

t 074 91 23759

Date: 10th April 2026

Re: EIA Scoping Application

Report to: MKO, Tuam Road, Galway, H91 VW84 - Emma Prior
<eprior@mkoireland.ie>

Addresses of proposed development: Meenbog Windwarm, Meenbog, Co. Donegal

Dear Sir/Madam,

Our service has no additional comments at this time. Please refer to the previous National Environmental Health Service report submitted on the 3rd October 2025. If you have any queries regarding this report, the initial point of contact is PEHO, details below.

Yours faithfully,

Finán Ó Gallchobhair

Príomhoifigeach Sláinte Comhshaoil | Principal Environmental Health Officer

Seirbhís Sláinte Comhshaoil Clinic Contae, Campas Ospidéal Naomh Conal, Leitir Ceanainn,
Co. Dhún na nGall F92 FW6Y.

Environmental Health Service County Clinic, St Conal's Hospital Campus, Letterkenny, Co
Donegal, F92 FW6Y.

0873772170 | Finan.Gallagher@hse.ie



HSE EIA Scoping

National Environmental Health Service Submission Report

Date: 03/10/2025

Our reference: EHIS 5247

Report to: MKO, Tuam Road, Galway, H91 VW84- Emma Prior
<eprior@mkoireland.ie>

Type of Consultation: EIA Scoping

Proposed development: Meenbog Wind Farm in County Donegal

Details of the application were circulated to the following HSE stakeholders on the 8th of September 2025:

- Emergency Planning
- National Capital Estates Office – Regional AND
- Director of National Health Protection
- REO West & North West

General Introduction

Planree Ltd. ('the Applicant') intends on applying to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000, as amended ('the Act'), for permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection (the "Existing Development") and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal ('the Prospective Development'), together (the "Subject Development"). The Meenbog Wind Farm Site where the construction activities have taken place for the Wind Farm is referred to as the "Wind Farm Site". The grid connection associated with the Meenbog Wind Farm will be referred to as the "Grid Connection Site". The Wind Farm Site and the Grid Connection Site together will be referred to as the 'Site'. The Meenbog Wind Farm Site is located within the townlands of Meenbog and Croaghonagh. The Grid Connection Site associated with Meenbog Wind Farm



is located within the townlands of Cashelnavean, Tawnawully Mountains, Friarsbush, Ardinawark, Keadew Upper, Keadew Lower and Cullionboy.

The Site is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town. It adjoins County Tyrone, specifically the administrative division of Omagh West, Barony of Termonamongan and the townlands of Slievadoo, Meenakeeran, and Sixth Corgary or Second Croagh along the Southeast Site boundary and is located approximately 19km west of Castlederg.

Following the peatslide, a number of deviations from the permitted plans for the Meenbog Windfarm were identified by Donegal County Council (DCC) and set out in a warning letter and subsequent clarifications under Section 152 of the Planning and Development Act, 2000 (as amended).

In October 2023, DCC sought injunctions pursuant to Section 160 of the Planning and Development Act 2000 restraining Planree from further development of the site until the issue of unauthorised development at the site had been regularised.

A High Court judgement delivered on the 10th of April 2024 found that as a result of the deviations from the consented plans the entire development, as constructed to date, was considered unauthorised development. On the 18th of December 2024 the Appeals Court (Donegal County Council v. Planree Ltd [2024] IECA 300 (Court of Appeal, Butler J, 18 December 2024) upheld the High Court ruling and affirmed that the entire wind farm, as constructed to date, requires substitute consent. The applicant is therefore applying for permission under Section 177E of the Act for the Subject Development Existing Development and the Prospective Development. Court documents, estimate that “about 86,240m³ of peat slid – of which about 65,740m³ left the 'scar areas' and entered the Shruhingarve Stream via which it flowed into the Mourne Beg River and on to nearby European Sites, including in Northern Ireland, causing significant environmental damage”.

Work on the construction of the wind farm has been paused pending a decision under Section 177E of the Act.

The following documents should be taken into consideration when preparing the Environmental Impact Assessment Report:

- Guidelines on the information to be contained in EIAR, 2022, www.epa.ie.
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanála_on_carrying_out_eia_-_August_2018.pdf



EU publication: Environmental Impact Assessment of Projects - Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf

Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the National Guidance for EIA and the EIAR accompanying a planning application.

New guidelines can be seen at:

<https://www.epa.ie/publications/monitoring--assessment/assessment/guidelines-on-the-information-to-be-contained-in-environmental-impact-assessment.php>

The applicant should also consider the findings of the High Court judgement issued in the judicial review of the Derryadd Wind Farm. (2021 IEHC 390 [20202 No. 557 JR] P. Sweetman v An Bord Pleanála)

Generally the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:

a) Description of the receiving environment; b) The nature and scale of the impact; c) An assessment of the significance of the impact; d) Proposed mitigation measures; e) Residual impacts.

Directive 2014/52/EU has an enhanced requirement to assess likely significant impacts on Population and Human Health.

It is the experience of the National Environmental Health Service (NEHS) that impacts on human health are often inadequately assessed in EIAs in Ireland. It is recommended that the wider determinants of health and wellbeing are considered in a proportionate manner when considering the EIA. Guidance on wider determinants of health can be found at www.publichealth.ie

In addition to any likely significant negative impacts from the proposed development, any positive likely significant impacts should also be assessed.

The HSE will consider the final EIAR accompanying the planning application and will make comments to the Planning Authority on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact. A site visit was carried out by Environmental Health Officer Adam Gargan on 01/10/2025.

The National Environmental Health Service (EHS) recommends that the following matters are included and assessed in the EIAR.



- Public Consultation • Decommissioning phase of the proposed wind farm • Siting and location of turbines • Noise & Vibration • Shadow Flicker • Air Quality • Surface and Groundwater Quality • Geological Impacts • Ancillary facilities • Cumulative impacts

The Donegal County Development Plan is the principal land use planning strategy document for County Donegal and sets out a vision for the sustainable future development of the County together with objectives and policies designed to achieve this vision. Chapter 11 of the Donegal County Development Plan 2024-2030 (DCDP) policies and objectives relates to landscape.

The protection of sensitive landscapes from unsuitable developments is seen as one of the Council's most important roles. The DCDP describes the designation of landscapes of the highest quality which are characterised by wilderness, and which have little or no man-made structures, including high quality coastal or upland areas. These areas are known as Areas of Especially High Scenic Amenity (EHSAs). These are mapped on Map 11.1 of the DCDP. The proposed turbine locations fall within the Landscape Classification Areas identified as 'Areas of Moderate Scenic Amenity' and 'Areas of High Scenic Amenity'.

Public Consultation

It is recommended that early and meaningful public consultation with the local community is undertaken to ensure all potentially significant impacts of the proposed windfarm development have been adequately addressed. All parties affected by the proposed development, including those who may benefit financially from the project, must be fully informed of what the proposal entails especially with regard to potential impacts on surrounding areas.

Sensitive receptors and other stakeholders should be identified to ensure all necessary and appropriate mitigation measures are put in place to reduce the likelihood of any complaints about the proposed wind farm development in the future.

The Environmental Impact Assessment Report (EIAR) should clearly demonstrate the link between public consultations and how those consultations have influenced the decision-making process in the EIA. To assist with the consultation and planning process it is recommended that the applicant develops a dedicated website for the proposed windfarm development.

All correspondence, maps, project updates and documentation including the EIAR should be uploaded to the website. The EIAR should state the period of planning permission sought, the length of time construction is estimated to take and if it is anticipated that the windfarm development will be decommissioned and removed or will continue to operate (following any further planning consent) at the end of this period of planning permission (should permission be granted).



Decommissioning

The EIAR should detail the eventual fate of the wind turbines and associated material i.e. will the material be recycled or how will it be disposed of. Information should also be provided regarding the proposed methodology to be used for the disposal of the materials forming the foundations of the wind turbines. The EIAR should indicate the proposed future use of the development site at the end of the planning permission period.

Siting, Location and details of Turbines

The EIAR should include a map and a description of the proposed location of each of the proposed wind turbines.

The National Environmental Health Service expects that details (height and model) of the turbines to be installed will be available at the time planning permission is sought and will be included in the EIAR. Details of the foundations for the wind turbine including depth, quantity and material to be used should be included in the EIAR.

Assessment of Consideration of Alternatives

The EIAR should consider an assessment of alternatives. The NEHS recommends that alternative renewable energy options to on- shore wind farms should be assessed as part of the EIAR.

Noise and Vibration:

The potential impacts for noise and vibration from the proposed development on all noise sensitive locations must be clearly identified in the EIAR.

The EIAR must also consider the appropriateness and effectiveness of all proposed mitigation measures to minimise noise and vibration. A baseline noise monitoring survey should be undertaken to establish the existing background noise levels. Noise from any existing turbines in the area should not be included as part of the back ground levels. In addition, an assessment of the predicted noise impacts during the construction phase and the operational phase of the proposed windfarm development must be undertaken which details the change in the noise environment resulting from the proposed development.

The Draft Revised Wind Energy Development Guidelines were published in December 2019. Whilst these have yet to be adopted, any proposed wind farm development should have consideration of the draft Guidelines.

https://www.housing.gov.ie/sites/default/files/publicconsultation/files/draft_revised_wind_energy_development_guidelines_december_2019.pdf

Shadow Flicker



It is recommended that a shadow flicker assessment is undertaken to identify any dwellings and sensitive receptors which may be impacted by shadow flicker. The assessment must include all proposed mitigation measures. Dwellings should include all occupied properties and any existing or proposed properties for which planning consent has been granted for construction or refurbishment. It is recommended that turbine selection will be based on the most advanced available technology that permits shut down during times when residents are exposed to shadow flicker. As a result no dwelling should be exposed to shadow flicker. Air quality due to the nature of the proposed construction works generation of airborne dust has the potential to have significant impacts on sensitive receptors.

A Construction Environmental Management Plan (CEMP) should be included in the EIAR which details dust control and mitigation measures.

Measures should include: • Sweeping of hard road surfaces • Provision of a water bowser on site, regular spraying of haul roads • Wheel washing facilities at site exit • Restrict speed on site • Provide covers to all delivery trucks to minimise dust generation • Inspect and clean public roads in the vicinity if necessary • Material stockpiling provided with adequate protection from the wind • Dust monitoring at the site boundary • Truck inspection and maintenance plan • Details of a road maintenance agreement between the wind farm operator and the local roads authority to clarify responsibility for the upkeep and repair of access roads during the construction phase of the project.

Surface and Ground Water Quality

The proposed development has the potential to have a significant impact on the quality of both surface and ground water. All drinking water sources, both surface and ground water, must be identified. Public and Group Water Scheme sources and supplies should be identified in addition to any private wells supplying potable water to houses in the vicinity of the proposed development. Measures to ensure that all sources and supplies are protected should be described.

The National Environmental Health Service recommends that a walk over survey of the site is undertaken in addition to a desktop analysis of Geological Survey of Ireland data in order to identify the location of private wells used for drinking water purposes. Any potential significant impacts to drinking water sources should be assessed. Details of bedrock, overburden, vulnerability, groundwater flows, aquifers and catchment areas should be considered when assessing potential impacts and any proposed mitigation measures.

Any impacts on surface water as a result of the construction of the underground cables should be identified and addressed in the EIAR.

Geotechnical and Peat Stability Assessment.



Notes from the Inspector's Report ABP-314062-22 Date of Site Inspection 25th July 2023.

" The alterations to internal access roads and turbine access roads/hardstanding areas involved groundworks/excavation, deposition of heavy stone material and alterations to the site surface water drainage network. The alterations to the access route to T7 and hardstanding at T9 were in response to a peat slide event (the event and subsequent engagement between the applicant, Planning Authority and the EPA is outlined in detail at Section 7 of the Planning Report submitted with the application). These works have the potential to affect the groundwater regime on this peatland site and have the ability to affect the quality and content of surface water discharges from the site. • The borrow pits involved deep excavation and removal of materials, in a number of instances with the excavated pit reused as a peat store. I observed substantial standing water in each of the borrow pits on my visit to the site. I consider the works have the potential to affect the groundwater regime on this peatland site and have the ability to affect the quality and content of surface water discharges from the site".

A detailed assessment of the current ground stability of the site for the proposed windfarm development and all proposed mitigation measures should be detailed in the EIAR. The assessment should include the impact construction work may have on the future stability of ground conditions, taking into consideration extreme weather events, site drainage and the potential for soil erosion. Information should be provided on the make and model of the turbines and on construction details for the turbine foundations, including the depth and volume of concrete required. An accurate assessment of the potential impacts of the foundations on water quality and peat stability cannot be undertaken without this information. Reference is made to a peat slide which occurred near Ballybofey in Co. Donegal on 13th November 2020 which may have been linked to construction activity at this particular Meenbog Wind Farm.

Potential impacts on water supply associated with contamination following a peat slide include sedimentation and alteration of pH levels. The Environmental Health Service recommends that a detailed Peat Stability/Geotechnical Assessment should be undertaken to assess the suitability of the soil for the proposed development.

The EIAR should include provision for a peat stability monitoring programme to identify early signs of potential bog slides ('pre-failure indicators' see the Scottish Government's 'Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Developments 2017)

<https://www.gov.scot/binaries/content/documents/govscot/publications/advice-andguidance/2017/04/peat-landslide-hazard-risk-assessments-best-practice->



guide-proposedelectricity/documents/00517176-pdf/00517176-pdf/govscot%3Adocument/00517176.pdf

Ancillary Facilities

The EIAR should include details of the location of all site office, construction compound, fuel storage depot, sanitary accommodation and canteen, First Aid facilities, disposal of wastewater and the provision of a potable water supply to the site canteen.

Cumulative Impacts

All existing or proposed wind farm developments in the vicinity should be clearly identified in the EIAR. The impact on sensitive receptors of the proposed development combined with any other wind farm/renewable energy developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed windfarm development.

Eve Smith

Oifigeach Sláinte Comhshaoil | Environmental Health Officer
Environment/Climate Change, Network Support Unit (NSU)

Adam Gargan

Oifigeach Sláinte Comhshaoil | Environmental Health Officer

*** All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to: Finan Gallagher, Principal Environmental Health Officer, HSE West, County Clinic, St. Conal's Campus, Letterkenny Co. Donegal F92 FW6Y**

Emma Prior

From: Eoghan Cross <Eoghan.Cross@fisheriesireland.ie>
Sent: Wednesday 25 March 2026 16:36
To: Emma Prior
Cc: Robert Kennedy; Thomas Blackwell; Karen O'Neill; kbourke@mkoireland.i
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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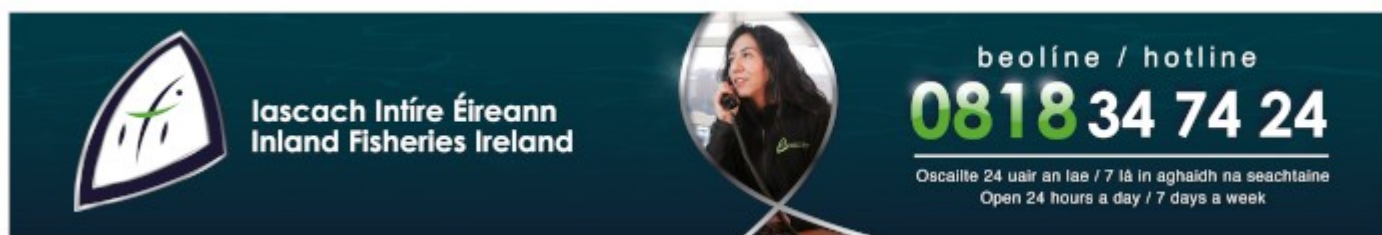
Good afternoon Emma,

The proposed habitat restoration areas are within the Foyle catchment. Loughs Agency is the prescribed body which should be consulted for relevant projects in the Foyle and Carlingford catchments. Please refer to the letter which was emailed to you on 24th October 2025 for Inland Fisheries Ireland's observations on the EIA scoping document in relation to the Grid Connection Site which is partially within the Eske catchment, and thus IFI's jurisdiction.

Best wishes,
Eoghan Cross

Eoghan Cross
Fisheries Environmental Officer

✉ Eoghan.Cross@fisheriesireland.ie • ☎ +353 (0) 71 9851435 • 🌐 www.fisheriesireland.ie • 🏠 F94 WV76



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To read our Privacy Policy and Email Disclaimer Notice, Please visit www.fisheriesireland.ie

From: Ballyshannon Info <ballyshannon@fisheriesireland.ie>
Sent: Wednesday 25 March 2026 16:15
To: Eoghan Cross <Eoghan.Cross@fisheriesireland.ie>
Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

Hi Eoghan

One for your area.

Thanks.

Angela

From: info <info@fisheriesireland.ie>

Sent: Wednesday 25 March 2026 16:08

To: Ballyshannon Info <ballyshannon@fisheriesireland.ie>

Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

Good afternoon All

Below email received to Citywest info

Kind regards

Yvonne

From: Emma Prior <eprior@mkoireland.ie>

Sent: Wednesday 25 March 2026 15:19

To: info <info@fisheriesireland.ie>

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>

Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

Dear Sir/Madam,

I am following up on the below scoping request regarding a planning application for Meenbog Wind Farm, in County Donegal, on behalf of Planree Ltd.

Please note that a minor amendment has been made to the site boundary, to account for the inclusion of habitat restoration land. The lands proposed for restoration measures will comprise two blocks of forestry, both located within the townland of Tievecloghoge. It is being proposed that the forestry within these blocks be felled and converted to peatland and scrub habitats. An updated map of the final planning application site boundary is attached.

We would welcome any comments that you might have in relation to the updated site boundary, alongside any other comments you may have relating to the original scoping document. If you could return comments or suggestions before April 1st, 2026, it would be much appreciated.

Kind regards,
Emma.

Emma Prior
Environmental Scientist

MKO

9C Beckett Way, Park West
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Offices in Galway and Dublin



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From: Emma Prior
Sent: Friday 5 September 2025 17:43
To: info@fisheriesireland.ie
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior

Graduate Environmental Scientist

MKO

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Emma Prior
MKO
9C Beckett Way
Park West Business Park
Dublin
D12 XN9W



Iascach Intíre Éireann
Inland Fisheries Ireland

Sent via email to: eprior@mkoireland.ie

24th October 2025

RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Ms. Prior,

Inland Fisheries Ireland (IFI) is a statutory body established on 1st July 2010. Under Section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) the principal function of IFI is the protection, management, and conservation of the inland fisheries resource.

On review of the development, the following observations are of relevance in relation to the above project:

The Environmental Impact Assessment Scoping Document (dated 2nd September 2025) outlines that the application site consists of the "Wind Farm Site" which is within the Foyle catchment and the "Grid Connection Site" which is within the Lowerymore sub basin within the Eske sub catchment. Loughs Agency is the prescribed body which should be consulted for relevant projects in the Foyle and Carlingford catchments. As the Wind Farm Site is not within Inland Fisheries Ireland's jurisdiction, comments below are exclusively in relation to the Grid Connection Site.

The Eske is considered an important sub catchment within the Ballyshannon fisheries district as it provides valuable habitat and spawning habitat for various species of fish, including:

- Brown trout (*Salmo trutta*),
- Atlantic Salmon (*Salmo salar*), listed in Annex II of the EU Habitats Directive (92/43/EEC), and
- European Eel (*Anguilla anguilla*), which is protected under Evaluation of Council Regulation (EC) No 1100/2007, as well as the Conservation of Eel Fishing Bye-Law No. C.S. 335, 2024.

The overall ecological status of the subject *LOWERYMORE_020* and *LOWERYMORE_030* waterbodies have been determined as "High" in the most recent EPA report. It is imperative that water quality, habitat and species diversity are protected within these waterbodies during any development or construction projects.

Ireland has seen a long-term trend of decline in the number of high-status river sites in recent decades. Of monitored river sites, 17.7% had high status in the 2020-2023 assessment period compared to 31.6% in the 1987-1990. High ecological status rivers are very sensitive to pollution including siltation and must be given robust protection to ensure there is no decline in status and the Water Framework Directive is complied with.

The EIA should assess the potential impacts the proposed development may have including, damage to the aquatic and associated riparian habitat, pollution of water, changes to hydrology, introduction of non-native species and interference with upstream and downstream movement of the aquatic life present. The assessment should include all aspects of the development, such as the construction of wind turbines, turbine foundations, hardstanding areas, any proposed borrow pit,

access tracks, electrical substation, grid connection, facilitating works on the public road network and at private properties to accommodate the delivery of turbine components etc.

IFI has the following comments to make in relation to the “Grid Connection Site” and the associated elements within the Environmental Impact Assessment.

1. The storage, management and conveyance of materials/cement/oils/fuels must not permit any deleterious matter reaching adjacent surface water systems either directly or indirectly.
2. Risks to water quality arising from works adjacent watercourses, the storage of fuels and materials, refuelling, vehicle maintenance and accidental spillages, etc., should be assessed. Subsequently, appropriate mitigation measures and sensitive work methods should be outlined in a Construction Environmental Management Plan, implemented and strictly enforced during the construction and operational phases, to ensure that no negative impact occurs on the adjacent watercourse.
3. A number of watercourses/drains may exist on site which are not marked on the OSI maps and must be subject to the proposed aquatic buffer zone and surveys.
4. A construction and operational phase water quality and habitat monitoring programme must be put in place. The monitoring of all surface flows during construction is essential and remote sensing equipment should be considered as a normal precaution and extended into the post construction phase.
5. The riparian habitat is integral to the functioning of the aquatic environment. The potential impacts of the development on the riparian habitat should be assessed. Adequately sized aquatic buffer zones must be established along all watercourses.
6. Watercourse crossings existing on site or along the proposed delivery routes must be assessed to determine if works will be required to facilitate site access and the potential impacts of such works. The locations and design of any proposed new watercourse crossings should be provided. IFI requests consultation in relation to the design; length, slope and width of any instream structure, temporary or permanent. Clear span structures such as Bailey bridges should be used for temporary crossings. There must be no negative impact on fish passage as a result of the proposed development.
7. No watercourse diversions are to be carried out to facilitate the development including site roads.
8. An assessment of the site transport routes must be carried out to identify any bridge or culvert replacement or improvement works. Including temporary modifications to facilitate turbine delivery to site.
9. All instream works or other works which may impact directly on a watercourse should only be carried out during between the 1st July to 30th of September (so as to avoid impacting on the aquatic habitat during the salmonid spawning season.) It would be important that this is included in the contract for construction.
10. There must be no spread of invasive species as a result of the proposed development. A survey for the presence of invasive species should be carried out and a management plan put in place where found.
11. It is recommended that a suitably qualified person be on site for the duration of works to ensure:
 - All mitigation measures identified are implemented prior to and during the construction phase, as appropriate.
 - Continual assessment to ensure the mitigation measures are effective.

- Cessation of works should surface water treatment be inadequate for suspended solid removal in surface waters.
- Arrangements are established in relation to a contact protocol for the relevant statutory bodies on progress of works.

12. This proposal should be undertaken in accordance with the relevant sections of the following publications:

- "A Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning": <https://www.fisheriesireland.ie/sites/default/files/migrated/docman/IFIUrbanWatercoursesPlanningGuide.pdf>
- "Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters": <https://www.fisheriesireland.ie/sites/default/files/migrated/docman/2016/Guidelines%20Report%202016.pdf>

Yours sincerely,

E Cross

Eoghan Cross
Fisheries Environmental Officer, Ballyshannon District,
North Western River Basin District, Inland Fisheries Ireland.

Emma Prior

From: INFO <Information@tii.ie>
Sent: Tuesday 31 March 2026 13:52
To: Emma Prior
Subject: TII25-133123 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Ms. Prior,

Thank you for your further correspondence of 25 March 2026 regarding the above, the contents of which have been noted. Transport Infrastructure Ireland's (TII) position remains as set out in TII's initial submission on the EIAR Scoping consultation of 17 September 2025.

I hope that this information is of assistance to you.

Yours sincerely,

Andrew Moore
Senior Regulatory & Administration Executive

From: Emma Prior <eprior@mkoireland.ie>
Sent: Wednesday 25 March 2026 15:20
To: Landuse Planning <LandUsePlanning@tii.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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Dear Sir/Madam,

I am following up on the below scoping request regarding a planning application for Meenbog Wind Farm, in County Donegal, on behalf of Planree Ltd.

Please note that a minor amendment has been made to the site boundary, to account for the inclusion of habitat restoration land. The lands proposed for restoration measures will comprise two blocks of forestry, both located within the townland of Tievecloghoge. It is being proposed that the

forestry within these blocks be felled and converted to peatland and scrub habitats. An updated map of the final planning application site boundary is attached.

We would welcome any comments that you might have in relation to the updated site boundary, alongside any other comments you may have relating to the original scoping document. If you could return comments or suggestions before April 1st, 2026, it would be much appreciated.

Kind regards,
Emma.

Emma Prior
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

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From: Emma Prior
Sent: Friday 5 September 2025 18:08
To: landuseplanning@tii.ie
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Mr. Mills,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is

located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

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Próiseálann BÍÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag <https://www.tii.ie/ga/compliance/data-protection-notice/>

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amháin. Más rud é go bhfuair tú an ríomhphost seo trí bhotún, cuir sin in iúil do postmaster@tii.ie, le do thoil, agus scrios an ríomhphost bunaidh agus aon cheangaltáin.

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Emma Prior

From: INFO <Information@tii.ie>
Sent: Wednesday 17 September 2025 15:23
To: Emma Prior
Subject: TII Ref: TII25-133123 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Dear Ms. Prior.

Thank you for your correspondence of 5 September 2025 regarding the above. Transport Infrastructure Ireland's (TII's) position in relation to your enquiry is as follows.

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

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

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

In relation to your EIAR and rEIAR Scoping referral, TII notes that proposals appear to indicate a site access to the N15, national road, via a direct private access at a location on the network that is subject to a 100kph speed limit. In such circumstances, it is critical that the developer/applicant be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply.

Therefore, there are policy and road safety considerations that would need to be resolved in any subsequent application as direct access or intensification of direct access to a national road conflicts with official policy on access to national roads. Alternative arrangements to the local road network should be utilised and not direct access to the national road, contrary to the provisions of official policy. It is noted with concern that the EIAR and rEIAR correspondence received does not appear to consider or address this significant and critical policy conflict.

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

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

- TII notes that the subject site has proposed access to the N15, national road. Access to the road network shall be developed in accordance with official policy and road safety considerations. As outlined above, access directly to a national road outside a reduced 50 – 60kph speed limit location should be avoided in accordance with the provisions of official policy. Alternative arrangements should be identified to ensure adherence to the provisions of official policy and in the interests of road user safety.
- Consultations should be had with the relevant Local Authority/National Roads Design Office, with regard to the locations of existing and future national road schemes.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, including the potential haul route.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Coimisiún Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts.
- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).
- The EIAR and rEIAR should have regard to TII's Environmental Assessment and Construction Guidelines, including the Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (National Road Authority (NRA), 2014).
- The EIAR and rEIAR should consider the 'European Communities (Environmental Noise) Regulations, 2018, (S.I. no. 549 of 2018)', and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (NRA, 2014)').
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads.

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

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

- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR and eEIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are a feature of the development, e.g., turbine

or substation components, separate structure approvals/permits and other licences may be required in connection with the proposed haul route. All national road structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed. Any requirements for 'Exceptional Abnormal Loads' should also be addressed in accordance with TII Publications.

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

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

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

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

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

- Where grid connection and cable routing form part of any development proposal, proposals should be developed to safeguard proposed road schemes, as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc. Consultation should be undertaken with Donegal County Council to ascertain any relevant national road schemes in the area.

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

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

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

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

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

Consistent with CAP24, for all renewable energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives for grid connection takes place,

including alternatives to public road, where appropriate. In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance, upgrades and safety works to existing national roads.

The Scheme promoter should also refer to Department of Transport Circular RW 07 of 2025 and the 'Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets)' which can be accessed at (<https://www.gov.ie/en/publication/ece06-electricity-transmission-infrastructure-development-roads-sector-engagement-framework-interim-guidance/>).

Having regard to the foregoing, in TII's opinion, grid connection routing, where it is proposed to utilise the road network must therefore demonstrate that the route proposed represents the 'optimal solution'.

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

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

No details of grid connection routing appear to be included in the subject EIAR Scoping Report. Having regard to the foregoing, in TII's opinion, the grid connection routing, where it is proposed to utilise the road network, must demonstrate that the route proposed represents the 'optimal solution'. In addition, there is a finite road space available to accommodate all utilities in the road network and TII recommends that a co-ordinated approach to grid connection routing in this area is achieved to avoid risk to the effective delivery of renewable energy projects in the area.

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

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

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

I hope that this information is of assistance to you.

Yours sincerely,

Suzanne Cahill
Senior Regulatory & Administration Executive

From: Emma Prior
Sent: Friday 5 September 2025 19:08
To: Landuse Planning
Cc: Robert Kennedy ; Thomas Blackwell

Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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Dear Mr. Mills,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

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Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,

Emma.

Emma Prior

Graduate Environmental Scientist

MKO

9C Beckett Way, Park West

Business Park, Dublin, D12

XN9W

Offices in Galway and Dublin

mkoireland.ie | +353 (0)91

735 611



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Emma Prior

From: Info @ Waterways Ireland <info@waterwaysireland.org>
Sent: Thursday 2 April 2026 15:41
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

You don't often get email from info@waterwaysireland.org. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Emma

Thank you for your email inviting Waterways Ireland to participate in this scoping exercise. Waterways Ireland has no remit within Donegal and as such will not be participating.

Kind Regards
Nuala Maguire
Marketing and Communications Section
Waterways Ireland – Enniskillen HQ
Tel no: +44 (0)28 6634 6232
Email: nuala.maguire@waterwaysireland.org

From: Emma Prior <eprior@mkoireland.ie>
Sent: 02 April 2026 15:19
To: Info @ Waterways Ireland <info@waterwaysireland.org>
Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

Dear Sir/Madam,

I am following up on the below scoping request regarding a planning application for Meenbog Wind Farm, in County Donegal, on behalf of Planree Ltd.

Please note that a minor amendment has been made to the site boundary, to account for the inclusion of habitat restoration land. The lands proposed for restoration measures will comprise two blocks of forestry, both located within the townland of Tievecloghoge. It is being proposed that the forestry within these blocks be felled and converted to peatland and scrub habitats. An updated map of the final planning application site boundary is attached.

We would welcome any comments that you might have in relation to the updated site boundary, alongside any other comments you may have relating to the original scoping document. If you could return comments or suggestions before April 10th, 2026, it would be much appreciated.

Kind regards,
Emma.

Emma Prior
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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From: Emma Prior
Sent: Friday 5 September 2025 19:17
To: sabine.browne@waterwaysireland.org
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Sir/Madam,

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Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

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Kind regards,
Emma.

Emma Prior

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Emma Prior

From: Michael Edwards <Michael.Edwards@cityofderryairport.com>
Sent: Thursday 26 March 2026 10:00
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

Follow Up Flag: Follow up
Flag Status: Flagged

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Hi Emma

Thank you for your email. I have assessed the proposed development at:

Meenbog Wind Farm,
Co. Donegal

I can confirm that CoDA will have no objection to this.
Best regards

Michael Edwards
ATS Manager
CODA Operations Ltd
Airport Road,
Eglington
BT47 3GY
www.cityofderryairport.com
T: +44 (0)28 71 81 07 84

From: Emma Prior <eprior@mkoireland.ie>
Sent: 25 March 2026 15:20
To: Information Desk <info@cityofderryairport.com>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

FAO Planning and Environmental Department

Dear Sir/Madam,

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Emma.

Emma Prior
Environmental Scientist

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Business Park, Dublin, D12 XN9W

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From: Emma Prior
Sent: Friday 5 September 2025 18:21
To: info@cityofderryairport.com
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

FAO Planning and Environmental Department

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Emma Prior

From: DAERA Planning Response Team <PlanningResponse.Team@daera-ni.gov.uk>
Sent: Friday 27 March 2026 08:57
To: Emma Prior
Cc: Robert Kennedy; Thomas Blackwell; Karen O'Neill; Keelin Bourke
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment
Attachments: PRT - EIA scoping request - Meenbog Wind Farm - Response.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

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Good morning,

Please find attached response that issued to you on 3rd October, we have no further comments.

Kind regards,

Darryn Coey
Central Services Team
Business Support - Planning Response Team
Department of Agriculture, Environment and Rural Affairs (DAERA)
Northern Ireland Environment Agency (NIEA)

NIEA Lisburn | 17 Antrim Road | Tonagh | Lisburn | BT28 3AL

For NIEA Planning Queries:

☎ +4428 90569604

✉ planningresponse.team@daera-ni.gov.uk

Web <https://www.daera-ni.gov.uk/>

NIEA Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
www.daera-ni.gov.uk | Northern Ireland Environment Agency

 An Agency within the Department of
Agriculture, Environment
and Rural Affairs
www.daera-ni.gov.uk

Gníomhaireacht de chuid na Roinne
Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe

An Agency w/in the Department of
Agriculture, Environment
and Rural Affairs
an' Kintra Matthers

From: Emma Prior <eprior@mkoireland.ie>
Sent: 25 March 2026 15:20
To: NIEA General Enquiries <nieainfo@daera-ni.gov.uk>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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Emma Prior
Environmental Scientist

MKO

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Business Park, Dublin, D12 XN9W

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From: Emma Prior
Sent: Friday 5 September 2025 18:24
To: daeradirect.strabane@daera-ni.gov.uk
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

FAO Planning and Environmental Department

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Emma.

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Your Reference: 240505
Our reference: AE1-25-6756

Emma Prior
Graduate Environmental Scientist
MKO

Email: eprior@mkoireland.ie

3 October 2025

Planning Response Team

NIEA Lisburn

17 Antrim Road

Tonagh

Lisburn

BT28 3AL

Telephone: 028 9056 9604

Email: planningresponse.team@daera-ni.gov.uk

Dear Sirs,

EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

I refer to your correspondence of 5 September 2025 regarding the above and request for comments.

We are pleased to provide comments and advice on the key environmental considerations for the Environment, Marine & Fisheries Group within DAERA.

For your convenience we have provided our comments under the following topic heading:

- Marine and Fisheries
- Regulation Unit
- Water Management Unit
- Natural Environment Division

If you wish to discuss anything raised in our response, please do not hesitate to contact the Planning Response Team using the contact details above.

Yours sincerely,

Planning Response Team



EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Inland Fisheries

The Loughs Agency is the lead body for provision of advice regarding impacts to salmonid and inland fisheries interests within the catchments of Lough Foyle and Carlingford Lough. Consequently, said agency should be consulted in relation to this application. DAERA Inland Fisheries will provide fisheries advice for those areas outside of the catchments of Foyle and Carlingford Loughs.

Marine Licensing

Activities taking place below the mean high water springs mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009.

Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the Mean High Water Spring Tide (MHWST). It is the applicant's responsibility to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

If any parts of this proposal are on, in or over the licensable area, contact must be made with the Marine Licensing Team, DAERA Marine and Fisheries Division, Clare House, 303 Airport Road West, Sydenham Intake, Belfast, BT3 9ED, Tel: 028 90569247, Email: MarineLicensingTeam@daera-ni.gov.uk. Further guidance on the application process and associated forms are available on the DAERA website at [Marine Licensing | Department of Agriculture, Environment and Rural Affairs](#)

It is an offence under the Marine and Coastal Access Act 2009 to carry out a licensable marine activity except in accordance with a marine licence granted by the

DAERA Marine and Fisheries Division. Conviction of such an offence may incur a fine of up to £50,000 and/or two years imprisonment.

DAERA MFD Fish Health Inspectorate

This proposal is directly upstream of Corgary Trout Farm AFFNI 7. Any disturbance to the strata can cause high levels of suspended solids and effect the fish health of this unit. There has been a previous case in this area.

Stringent mitigation of suspended solids and stabilising land is required.

Regulation Unit

Planning Reference: EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Section Reference: AE1-25-6756

Considerations

Regulation Unit, Land and Groundwater Team (LGW) has considered the proposal and on the basis of the information provided refers to standing advice.

Explanatory note

Standing Advice

This standing advice identifies the potential impacts on the water environment that should be considered at the pre-application stage for windfarm applications.

Key environmental considerations

The foundations of wind turbines have the potential to impact on the groundwater environment for example groundwater flow paths, groundwater receptors (aquifers) or secondary receptors (including private water supplies). An assessment of the potential impact facilitates the Regulation Unit, Land and Groundwater Team to form an opinion on the application. Groundwater receptors should be identified and the risk of potential impact assessed and, where required, mitigation measures should be identified. These steps should be assessed through both a desktop and field-based Water Feature Survey.

Further information is provided within “Environmental information required” and “Baseline environmental information”.

Environmental information required

Please see our guidance available on the DAERA website on ‘Water feature surveys’ and ‘Wind farms and groundwater impacts’ available at:

<https://www.daera-ni.gov.uk/publications/best-practice-guidance-documents>

It is recommended that the applicant seeks the professional advice of a hydrogeologist. Hydrogeologists (not hydrologists) can be identified through internet search, Yellow Pages or the Ends Directory (www.endsdirectory.com)

In addition to the guidance listed above Regulation Unit (Land and Groundwater Team) would direct the attention of the applicant/ agent to the planning advice which is available on the DAERA website under the Topic: **Environmental Advice for Planning** (<https://www.daera-ni.gov.uk/topics/environmental-advice-planning>) with particular reference to the following pages:

Regulation Unit

<https://www.daera-ni.gov.uk/articles/development-may-have-effect-water-environment-including-groundwater-and-fisheries>

<https://www.daera-ni.gov.uk/articles/wind-energy-installations>

Baseline environmental information

Groundwater baseline information which will feed into a water feature survey can be obtained from our online NIEA Catchment Data Map Viewer and our WMU Water Information Request Viewer at <https://www.daera-ni.gov.uk/articles/daera-map-viewers>

Information on private water supplies sourced from groundwater might be obtained from:

- Northern Ireland Environment Agency groundwater monitoring sites: Information on the sites can be obtained by either the WMU Water Information Request Viewer or by contacting waterinfo@daera-ni.gov.uk
- Abstraction & Impoundment Licensing: Information on the licensed sites can be obtained by either the WMU Water Information Request Viewer or by contacting waterinfo@daera-ni.gov.uk
- Drinking Water Inspectorate: Information on private water supplies can be obtained by contacting dwi@daera-ni.gov.uk
- Environmental Health section of the local council

Some layers displayed on the map viewers are also available as a digital dataset, which can be downloaded and used within your own project. Follow the guidance on the web page at <https://www.daera-ni.gov.uk/articles/wmu-digital-dataset-downloads> or at <https://www.opendatani.gov.uk/>.

Water Management Unit

Planning: EIA Scoping Request for Meenbog Wind Farm

Section Reference: WMU/PC/ 38111-1

Date of Response: 15/08/2025

Water Management Unit notes the location of this proposal.

Baseline

In relation to Northern Ireland Baseline Information and Data Sources, DAERA have two map viewers in relation to the aquatic environment that may be of use, Water Information Request Web Viewer and NIEA Catchment Data Map Viewer, both of which can be found at <https://www.daera-ni.gov.uk/articles/daera-map-viewers>

Several useful information sources are available that highlight the current state of the environment in Northern Ireland at a regional level which could be referenced, including the Northern Ireland Environmental Statistics Report, the latest of which currently is dated May 2025.

Northern Ireland Environmental Statistics Reports: <https://www.daera-ni.gov.uk/articles/northern-ireland-environmental-statistics-report>

DAERA issued a consultation document on Significant Water Management Issues to inform the development of the third cycle River Basin Management Plan (2021-2027). This gives further consideration of the pressures and their sources on water quality in Northern Ireland.

Further details on this issue can be found at [Planning for the third cycle River Basin Management Plan 2021-2027 - Consultation on Significant Water Management Issues December 2019 | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](https://www.daera-ni.gov.uk/articles/planning-for-the-third-cycle-river-basin-management-plan-2021-2027-consultation-on-significant-water-management-issues-december-2019)

River Basin Management Plans are the key tools for implementing the Water Framework Directive and to achieving its objectives. If the potential for impacts to the aquatic environment in Northern Ireland are identified, then the NI River Basin Management Plans must be considered during the process. It is important that cross border river basins are given special attention as ecological functionality cross jurisdictional boundaries.

DAERA has published the River Basin Management Plan for the 3rd cycle period which runs from 2021-2027. The plan provides an update on the health of Northern Ireland's water environment (the status of water bodies) and sets out our targets (objectives) and actions (programme of measures) on how we want to improve our water environment in the next six years. The plan covers the North Western, Neagh Bann and North Eastern river basin districts (RBD) and includes detailed status updates on each RBD.

The River Basin Management Plan for the 3rd cycle and supporting documents can be found at: [Third River Basin Management Plan for Northern Ireland | Department of Agriculture, Environment and Rural Affairs](https://www.daera-ni.gov.uk/articles/third-river-basin-management-plan-for-northern-ireland)

There are several key pieces of environmental legislation relating to the Water Environment and its protection in Northern Ireland.

A list of Northern Ireland's environmental legislation relating to the aquatic environment including links to each individual piece of legislation is available at [Water | NetRegs | Environmental guidance for your business in Northern Ireland & Scotland](#)

Key environmental considerations

Refer to:

- DAERA Standing Advice Pre-Application Discussion Advice:

All DAERA Standing advice referred to in this response unless otherwise stated can be found at the following link [Standing Advice | Department of Agriculture, Environment and Rural Affairs](#)

Environmental information required.

Impacts that should be considered include, (but may not be limited to), those relating to water quality, water quantity, hydromorphology, and in addition any impact on NI/RoI migratory/mobile species such as salmon. Assessment should consider all potential impacts both direct and indirect.

At the pre-application stage of a development there is limited information about the circumstances, scope, and nature of the project and therefore Water Management Unit can only provide 'general' advice.

The following Standing Advice in relation to the aquatic environment will be particularly relevant to this application: (Note depending on the specifics of this proposal other DAERA Standing Advice will also be appropriate).

- DAERA Standing Advice Commercial or Industrial Developments
- DAERA Standing Advice Culverting
- DAERA Standing Advice Pollution Prevention Guidance
- DAERA Standing Advice Discharges to the Water Environment
- DAERA Standing Advice Abstractions and Impoundments.

Further guidance

Water Management Unit would recommend that any future application clearly demonstrate the following.

1. Clear details of any proposed works in, near or liable to affect a waterway (as defined below) including any proposed culverting, realignment, and crossings.

2. How will foul sewage be disposed of from the proposed development both during construction and if applicable during the operational phase.
3. Clear details of how surface water will be disposed of from the proposed development during both the construction and operational phases.
4. Water Management Unit recommends the application demonstrates compliance with all the relevant precepts contained in DAERA Standing Advice Pollution Prevention Guidance. In addition, the application should demonstrate compliance with all the relevant precepts contained in documents referenced within this Standing Advice, such as GPP's. Water Management Unit notes the scoping document references PPG documents. These are out of date. Only the most up to date best practice should be utilised during these works.
5. The identification of any statutory environmental permissions relating to the water environment that will be required, / applied for, as part of this proposal. Water Management Unit recommends early identification of this and subsequent early engagement with the relevant statutory body.

Proposal Specific Guidance

The risks from certain activities to the aquatic environment are greater than others and all proposed mitigation must be proportionate and commensurate to that risk. The risks can be further increased due to the location of the site.

Water Management Unit consider the definition of a waterway to be that as defined under the NI Water Order 1999:

"Waterway" includes any river, stream, watercourse, inland water (whether natural or artificial) or tidal waters and any channel or passage of whatever kind (whether natural or artificial) through which water flows.

In this Order any reference to a waterway includes a reference to the channel or bed of a waterway which is for the time being dry.

The location and length of any proposed culverting, realignment, and crossings of a waterway as defined above, (including those needed to access the area of works), should be clearly identified.

Water Management Unit recommends the applicant refer and adhere to all the relevant precepts contained in DAERA Standing Advice Culverting.

Clear details of how foul sewage will be disposed of from the proposed development during the construction and if applicable during the operational phase should be provided.

Clear details should be provided of how surface water will be disposed of from the proposed development during the construction and operational phases. It should be noted Water

Management Unit favour (where appropriate) the use of Sustainable Urban Drainage Systems. Water Management Unit recommends the applicant refer and adhere to all the relevant precepts contained in DAERA Standing Advice Sustainable Drainage Systems.

Water Management Unit recommends the applicant refer and adhere to, and the application demonstrate compliance with all the relevant precepts contained in DAERA Standing Advice Pollution Prevention Guidance. In addition, all the relevant precepts contained in documents referenced within this Standing Advice including, but not limited to:

1. Understanding your environmental responsibilities – good environmental practices: GPP 1
2. Above ground oil storage tanks: GPP 2
3. Use and design of oil separators in surface water drainage systems: GPP 3
4. Treatment and disposal of wastewater where there is no connection to the public foul sewer: GPP 4
5. Works and maintenance in or near water: GPP 5
6. Working at construction and demolition sites: GPP 6
7. Dewatering underground ducts and chambers: GPP 20
8. Pollution incident response planning: GPP 21
9. Dealing with spills: GPP 22
10. Safe Storage of Drums and Intermediate Bulk Containers (IBCs): GPP 26
11. Installation, Decommissioning and Removal of Underground Storage Tanks: GPP 27
12. Control of Pollution (Oil Storage) Regulations (Northern Ireland) 2010
13. CIRIA guidance documentation C532 'Control of water pollution from construction sites: guidance for consultants and contractors

Guidance for Pollution Prevention (GPP) documents are available at

<https://www.netregs.org.uk/environmental-topics/guidance-for-pollution-prevention-gpp-documents/>

A guidance document for the Control of Pollution (Oil Storage) Regulations (Northern Ireland) 2010 providing background information on the Regulations can be found at:

[Control of Pollution \(Oil Storage\) Regulations \(Northern Ireland\) 2010 guidance | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](https://www.daera-ni.gov.uk/control-of-pollution-oil-storage-regulations-northern-ireland-2010-guidance)

CIRIA Guidance can be obtained at:

https://www.ciria.org/ci/Civil_infrastructure/CIRIA_guidance.aspx.

The identification of any statutory environmental permissions relating to the water environment that will be required / applied for as part of this proposal. Water Management Unit recommends early identification of this and subsequent early engagement with the relevant statutory body.

Water Management Unit would like to point out that they are not the competent authority to comment on any peat stability issues. If peat instability were likely at the site, Water Management Unit would have concern regarding potential impacts on surface waters. If peat stability may be an issue at this site the applicant should address this and Water

Management Unit recommends the Planning Authority should consult the relevant competent authority for any considerations, they might have.

Effective mitigation measures must be in place to protect the water environment and surrounding water bodies from any discharge into them that may damage ecological status and to ensure that the Water Framework Directive (WFD) objectives for water bodies are not compromised nor the WFD objectives in other downstream water bodies in the same and other catchments.

The applicant should be informed that it is an offence under the Water (Northern Ireland) Order 1999 to discharge or deposit, whether knowingly or otherwise, any poisonous, noxious, or polluting matter so that it enters a waterway or water in any underground strata. Conviction of such an offence may incur a fine of up to £20,000 and / or three months imprisonment.

The applicant should ensure that measures are in place to prevent pollution of surface or groundwater as a result of the activities on site, both during construction and thereafter.

Natural Environment Division

Date of NED Response: 1 October 2025

Considerations

NIEA Natural Environment Division (NED) acknowledges receipt of a consultation for an Environmental Impact Assessment scoping request for the regularisation of several alterations to the original Planning Permission for the 19 turbine Meenbog Wind Farm in County Donegal. These alterations are required following a peat slide which occurred on 12 November 2020.

NED has considered the Environmental Impact Assessment Scoping Document: Meenbog Wind Farm Substitute Consent 02/09/2025.

The proposal is subject to the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended) (known as the Habitats Regulations).

Designated Sites

The application site is hydrologically connected to the River Derg, which is part of the River Foyle and Tributaries Special Area of Conservation (SAC) and Area of Special Scientific Interest (ASSI), and is adjacent to Killeter Forest Bogs and Lakes ASSI and Croagh Bog ASSI (hereafter referred to as the designated sites) which are of international and national importance and are protected by Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended) and The Environment (Northern Ireland) Order 2002 in Northern Ireland.

- River Foyle and Tributaries SAC is designated for watercourses of plain to montane levels with the *Ranunculus fluitantis* and *Callitriche-Batrachion* vegetation, Atlantic Salmon (*Salmo salar*) and Otter (*Lutra lutra*).
- Killeter Forest Bogs and Lakes ASSI is designated for intact blanket bogs and oligotrophic lakes.
- Croagh ASSI is designated for its extent of intact blanket bogs and for the Argent and Sable Moth *Rheumaptera hastata*.

There are salmon records within the development site and the closest record within River Foyle and Tributaries ASSI/SAC is 3.6km downstream. The habitats within the River Foyle system that could potentially be affected by the development are salmon nursery, holding and spawning habitats. The development could cause permanent loss or fragmentation to habitats. Excess sediment can smother spawning habitats, reducing habitat quality and reduction in food species.

NED consider that the development has the potential to pose significant risks to the River Foyle and Tributaries SAC/ASSI:

- Degradation of the adjacent aquatic environment from contaminated runoff resulting during construction and operational works.
- Degradation of the aquatic environment through an increase in suspended solids and contaminated surface water run-off (e.g. silt laden run-off, spoil/cement slurries/plant fuel/oil, wastewater, chemical contaminants)
- Peat failure/slide resulting in significant sediment mobilisation, resulting in sedimentation of downstream water bodies.
- Sediment released into the watercourse from construction work can be detrimental to salmon, resulting in the gills being smothered, or their passage upstream impeded. Sediment can

Natural Environment Division

smother gravels by infilling of interstitial spaces, leading to reduced oxygen flow across the spawning bed.

- Construction related pollution incidents can result in a reduction of prey for otters due to adverse impacts on fisheries. Additionally, otters may be directly impacted through destruction of holts or disturbance during construction works.

NED recommend that any future consultation should include:

1. An outline Construction Environmental Management Plan (oCEMP) which should identify potential risks to the aquatic environment, potential pollution pathways, and mitigation measures to negate such risks. It should include;
 - Construction Method Statement(s), including details of construction and excavation
 - Pollution Prevention Plan, including details of a suitable buffer of 10m between the location of refuelling, storage of oil/fuel/substrate/construction materials/machinery, concrete mixing and washing areas and any watercourses/surface drain on site
 - Site Drainage Plan, including details of Sustainable Drainage Systems (SuDS), foul waste disposal, surface water disposal/treatment and silt management measures
 - Spoil Management Plan, including location of spoil storage areas outwith the 10m buffer zone
 - Environmental Emergency Plan, including details of emergency spill procedures and regular inspections of machinery onsite
 - Water Quality Monitoring Plan
 - Mitigation measures to be put in place to protect otter and salmon communities
 - Details of the appointment of an Ecological Clerk of Works (ECoW), detailing their roles and responsibilities.

This list is not exhaustive but should merely be used as a guideline for considerations to be made.

2. Details of the proposed works that are within/adjacent/hydrologically connected to any designated sites. This should include any proposed mitigation measures to protect the site from any potentially adverse impacts from the proposal. All Ecological Surveys and Habitat Surveys for these areas should also be submitted.
3. A Habitats Regulations Assessment should be conducted to determine if the proposal has the potential to impact nearby European designated sites.

Further Guidance

Please note that NIEA have developed a range of standing advice and a biodiversity checklist that would assist with the consideration of potential impacts of planning proposals on natural heritage interests:

NIEA Standing Advice can be found at: [DAERA-Standing-Advice](#)

NED survey specifications and other planning related advice can be found at: <https://www.daera-ni.gov.uk/articles/site-survey>

Natural Environment Division

The DAERA website <https://www.daera-ni.gov.uk/> includes:

- Details of all regional, national and international designated sites in Northern Ireland
- Northern Ireland Biodiversity Strategy
- Northern Ireland Habitat and Species Action Plans
- Areas of Outstanding Natural Beauty
- Landscape Character Areas
- Environmental Legislation

Information on the flora, fauna and geology of Northern Ireland can be obtained from the Habitas website: <http://www.habitas.org.uk/>

Site specific environmental data (e.g. species records) can be obtained from the Centre for Environmental Data and Recording (CEDaR). These can be accessed by contacting CEDaR, National Museums NI, 153 Bangor Road, Cultra, Holywood, BT18 0EU. Website: <http://www.nmni.com/cedar>

NED promotes the submission of biodiversity data to CEDaR, and recommends that species records generated as part of the EIA process are submitted to CEDaR by going to: <https://www.nmni.com/CEDaR/CEDaR-submitting-records.aspx>

Emma Prior

From: DFI Regional Planning <Planning@infrastructure-ni.gov.uk>
Sent: Friday 28 November 2025 15:19
To: Emma Prior
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal
Attachments: Department of Infrastructure NI - Scoping Document - F - 2025.09.05 - 240505.pdf
Follow Up Flag: Follow up
Flag Status: Completed

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Dear Emma

Thank you for your email of 5 September and apologies for the delay in issuing a response.

Under Regulation 30 of the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017, the Department can enter into consultations with another EEA state regarding the potential significant effects of a proposed project on the environment in Northern Ireland and the measures envisaged to reduce or eliminate such effects. Given the proximity of the development to the border with Northern Ireland, potential transboundary effects should be considered as part of the environmental impact assessment.

Kind regards

Dfi Planning
Regional Planning Policy & Casework



From: Emma Prior <eprior@mkoireland.ie>
Sent: 05 September 2025 19:29
To: DFI Public Mailbox Enquiries <Info@infrastructure-ni.gov.uk>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

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DfI Rivers Directorate Planning Advisory Unit

Emma Prior
MKO
9c Beckett Way
Park West Business Park
Dublin
D12 XN9W

44 Seagoe Industrial Estate
CRAIGAVON
Co. Armagh
BT63 5QE
Tel: 028 3839 9118

Your Ref:
Our Ref: IN1-23-8158

Date: 26/03/2026

Dear Madam

Re: Informal Environmental Scoping Request for Alterations to Meenbog Windfarm located in Meenbog (and surrounding townlands), Co. Donegal

In response to your email dated 25th March 2026, welcoming any comments that Rivers Directorate might have in relation to the updated site boundary, alongside any other comments Rivers Directorate may have relating to the original scoping document.

DfI Rivers Directorate's comments in its consultation response to Derry City & Strabane District Council, dated 21st March 2024, remain valid.

If you require any additional information or clarification, please feel free to contact me at the above address or via email quoting our reference number.

Yours faithfully

Neil Jenkinson
Planning Advisory Unit

DfI Rivers Directorate Planning Advisory Unit

Danielle Moore
Derry City and Strabane District Council
Local Planning Office
98 Strand Road
Derry
BT48 7NN

44 Seagoe Industrial Estate
CRAIGAVON
Co. Armagh
BT63 5QE
Tel: 028 3839 9118

Your Ref:
LA11/2024/0100/DETEIA
Our Ref: IN1-23-8158

Date: 21/03/2024

Dear Madam,

Re: Informal Environmental Scoping Request for Alterations to Meenbog Windfarm located in Meenbog (and surrounding townlands), Co. Donegal

In response to your consultation dated 8th February 2024, with reason for consultation given as *'This consultation relates to an EIA screening determination request from the applicant. Please advise any matters of environmental concern'*.

DfI Rivers remit is limited to commenting on flood risk and drainage matters in accordance with the SPPS and Revised Planning Policy Statement 15 Planning and Flood Risk (Revised PPS 15).

DfI Rivers requests that if any storm water runoff from the proposed development is discharged into cross border watercourse catchments that the discharge is limited to existing or green field runoff rates.

If you require any additional information or clarification, please contact me at the above address quoting the reference number.

Yours faithfully,
Shaun Stevenson

Planning Advisory Unit

Emma Prior

From: Andree McNee <Andree.McNee@derrystrabane.com>
Sent: Thursday 9 April 2026 17:03
To: Emma Prior
Cc: Proinsias McCaughey
Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment
Attachments: Subject Development Site Boundary - 2026.03.25 - 240505.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

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Good afternoon Emma

Thank you for your e mail below which has been passed to me for response.

I apologise for the delay in responding.

Derry City and Strabane District Council would have no further comments to make on the updated site boundary or the amendments proposed.

We would however advise that you should seek comments from other departments including Northern Ireland Environment Agency (NIEA).

Kind regards

Andree

From: Emma Prior <eprior@mkoireland.ie>
Sent: 25 March 2026 15:20
To: info <info@derrystrabane.com>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

Dear Sir/Madam,

I am following up on the below scoping request regarding a planning application for Meenbog Wind Farm, in County Donegal, on behalf of Planree Ltd.

Please note that a minor amendment has been made to the site boundary, to account for the inclusion of habitat restoration land. The lands proposed for restoration measures will comprise two blocks of forestry, both located within the townland of Tievecloghoge. It is being proposed that the forestry within these blocks be felled and converted to peatland and scrub habitats. An updated map of the final planning application site boundary is attached.

We would welcome any comments that you might have in relation to the updated site boundary, alongside any other comments you may have relating to the original scoping document. If you could return comments or suggestions before April 1st, 2026, it would be much appreciated.

Kind regards,
Emma.

Emma Prior
Environmental Scientist

MKO

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Offices in Galway and Dublin
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From: Emma Prior
Sent: Friday 5 September 2025 18:30
To: info@derrystrabane.com
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

Dear Sir/Madam,

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- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject

Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior

Graduate Environmental Scientist

MKO

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Emma Prior

From: NIE Customer Contact <CustomerContact@nienetworks.co.uk>
Sent: Friday 3 April 2026 08:58
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

Follow Up Flag: Follow up
Flag Status: Flagged

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Good Morning Emma,

Thank you for contacting NIE networks.

I noticed in your enquiry that this query is regarding Co. Donegal, unfortunately we only deal strictly with Northern Ireland so we would be unable to provide assistance with this.

I would advise you to contact ESB networks to help with this.

Kind Regards
Chloe

From: Emma Prior <eprior@mkoireland.ie>
Sent: 02 April 2026 15:14
To: NIE Customer Contact <CustomerContact@nienetworks.co.uk>
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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Dear Sir/Madam,

I am following up on the below scoping request regarding a planning application for Meenbog Wind Farm, in County Donegal, on behalf of Planree Ltd.

Please note that a minor amendment has been made to the site boundary, to account for the inclusion of habitat restoration land. The lands proposed for restoration measures will comprise two blocks of forestry, both located within the townland of Tievecloghoge. It is being proposed that the forestry within these blocks be felled and converted to peatland and scrub habitats. An updated map of the final planning application site boundary is attached.

We would welcome any comments that you might have in relation to the updated site boundary, alongside any other comments you may have relating to the original scoping document. If you could return comments or suggestions before April 10th, 2026, it would be much appreciated.

Kind regards,
Emma.

Emma Prior
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

Offices in Galway and Dublin
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From: Emma Prior
Sent: Friday 5 September 2025 18:41
To: customercontact@nienetworks.co.uk
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

FAO Planning and Environmental Department

Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

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Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject

Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior
Graduate Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

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Emma Prior

From: waterline <waterline@niwater.com>
Sent: Wednesday 1 April 2026 17:05
To: Emma Prior
Subject: 240505 – EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, County Donegal- Minor Amendment

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Ms Prior,

CMS Reference: 9260326/45704

Re: 240505 – EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, County Donegal- Minor Amendment

Thank you for your email received 25 March 2026, regarding the above.

Thank you sincerely for your patience in this written response.

I can confirm that this matter has been reviewed by our Developer Services department, and our dedicated Lands Officers for the area.

It was confirmed that, as this application is not based on a location within Northern Ireland, NI Water would not be able to give advice regarding planning applications which would be the responsibility of third-party utility providers.

I apologise that I cannot provide any more assistance at this time. I hope you find this information helpful, however.

Please note, if you need to contact us in the future, or need to inform us of a matter requiring immediate attention, you can now contact us via Webchat or on our Social Media channels which are available, 8am-11pm, 7 days a week.

[Get Social - Northern Ireland Water \(niwater.com\)](https://niwater.com)

Yours sincerely,

JACK MCCANN
Customer Service Centre

Should you need to contact us in the future, our contact details can be found on our website:

www.niwater.com/contact-us/

Customer Care Register - We offer a range of free additional services if you have a disability, are an older consumer, have a serious medical condition or need extra help for any other reason. Click [here](#) for more info about our Customer Care Register.

To find out more about our free Text Alert service, click on the link below to visit our website:

www.niwater.com/register-for-keeping-you-informed/

Details of our Complaints Procedure can be found online: www.niwater.com/complaints

Save time...

...do it online!

Help yourself to our Self Service Portal:

digitalservices.niwater.com

From: Emma Prior <eprior@mkoireland.ie>

Sent: 25 March 2026 15:20

To: waterline <waterline@niwater.com>

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>

Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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Dear Sir/Madam,

I am following up on the below scoping request regarding a planning application for Meenbog Wind Farm, in County Donegal, on behalf of Planree Ltd.

Please note that a minor amendment has been made to the site boundary, to account for the inclusion of habitat restoration land. The lands proposed for restoration measures will comprise two blocks of forestry, both located within the townland of Tievecloghoge. It is being proposed that the forestry within these blocks be felled and converted to peatland and scrub habitats. An updated map of the final planning application site boundary is attached.

We would welcome any comments that you might have in relation to the updated site boundary, alongside any other comments you may have relating to the original scoping document. If you could return comments or suggestions before April 1st, 2026, it would be much appreciated.

Kind regards,
Emma.

Emma Prior
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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From: Emma Prior
Sent: Friday 5 September 2025 18:42
To: waterline@niwater.com
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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- Environmental Impact Assessment Report (EIAR)
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Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,
Emma.

Emma Prior

Graduate Environmental Scientist

MKO9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

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Emma Prior

From: NIPlanning <NIPlanning@rspb.org.uk>
Sent: Tuesday 31 March 2026 17:09
To: Emma Prior
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Emma

Thank you for contacting the RSPB in respect of this site boundary amendment relating to the inclusion of habitat restoration land.

We continue to have very limited capacity due to a high volume of other priority work and staffing gaps, and as a result are unable to provide further comments on this proposal at the present time.

We would however like to highlight our previous recommendation in respect of this proposal to contact our sister organisation, Birdwatch Ireland (BWI), who may have more local knowledge of the site (including the habitat restoration land).

Please send any future correspondence for the RSPB NI planning team to this inbox.

Kind regards

**NI Planning
RSPB**



RSPB Northern Ireland Headquarters

Belvoir Park Forest
Belfast
BT8 7QT

rspb.org.uk



Protecting habitats, saving species and helping to end the nature and climate emergency.

Nature is in crisis. Together we can save it.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654.

From: RSPB Nireland <rspb.nireland@rspb.org.uk>
Sent: 26 March 2026 08:27
To: NIPlanning <NIPlanning@rspb.org.uk>
Subject: FW: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

From: Emma Prior <eprior@mkoireland.ie>
Sent: 25 March 2026 15:21
To: RSPB Nireland <rspb.nireland@rspb.org.uk>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>; Keelin Bourke <kbourke@mkoireland.ie>
Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

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From: Emma Prior
Sent: Friday 5 September 2025 18:47
To: rspb.nireland@rspb.org.uk
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

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MKO
Tuam Road
Galway
H91 VW84



24th October 2025

To whom it may concern,

Re: EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

The RSPB is Europe's largest voluntary nature conservation organisation and is supported by over 1 million members in the UK, around 12,500 of which reside in Northern Ireland (NI). As such we thank you for sending the above named consultation through to us for comment.

Due to limited capacity and high workload, we would refer back to our responses submitted in relation to the original application and our correspondence dated 01.03.2024. These are attached to this response for your convenience.

Please do not hesitate to contact the Conservation Officer with any related queries.

Yours faithfully

Conservation Officer

RSPB Northern Ireland

RSPB Northern Ireland
Headquarters
Belvoir Park Forest
Belfast
BT8 7QT

Tel: 028 9049 1547
Facebook: RSPBNI
Twitter: @rsbni
Instagram: rspb_ni
rspb.org.uk



The RSPB is part of BirdLife International, a Partnership of conservation organisations working to give nature a home around the world.

Planning Office
Derry City and Strabane District Council
98 Strand Road
Derry
BT48 7NN



1st March 2024

To whom it may concern,

Application Reference: LA11/2024/0100/DETEIA

Proposal: Meenbog Wind Farm

Location: Meenbog (and surrounding townlands), Co. Donegal

The RSPB is Europe's largest voluntary nature conservation organisation and is supported by over 1 million members in the UK, around 11,000 of which reside in Northern Ireland (NI). As such we thank you for sending the above named consultation through to us for comment.

Due to limited capacity and high workload, we would refer back to our responses submitted in relation to the original application. These responses are attached with the 2017 scoping response (LA11/2016/1055/TBA) in Appendix A and the 2018 response to the full application (LA11/2017/1134/TBA) in Appendix B. We would advise the applicant to pay particular attention to our comments in Appendix A which relate to peat.

Please do not hesitate to contact the Conservation Officer with any related queries.

Yours faithfully

Conservation Officer

RSPB Northern Ireland

RSPB Northern Ireland
Headquarters
Belvoir Park Forest
Belfast
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Tel: 028 9049 1547
Facebook: RSPBNI
Twitter: @rsbni
Instagram: rspb_ni
rspb.org.uk



The RSPB is part of BirdLife International, a Partnership of conservation organisations working to give nature a home around the world.

Appendix A

DfI Strategic Planning Division
Clarence Court
10-18 Adelaide Street
Belfast
BT2 8GB

27 January 2017

Dear Sir/Madam

RE: intent to submit an Environmental Statement (ES) for a proposed wind farm at Carrickaduff, Meenbog and adjacent townlands, Co Donegal (LA11/2016/1055/TBA)

The RSPB is Europe's largest voluntary nature conservation organisation and is supported by over 1 million members, 13 000 of which reside in Northern Ireland (NI). As such we thank you for sending the above named consultation through to us for comment. Please find below our recommendations as to what we expect the Environmental Statement (ES) should contain as well as advice on data collection and surveys.

Please note that we do not manage any site specific data for the proposed site because of the location in the Republic. The content of this response is normally for a site in Northern Ireland. We recommend you contact Birdwatch Ireland (BWI) regarding the ornithological impacts of this proposal as they may possess more site specific data. We also recommend the agent contacts both the Northern Ireland Environment Agency (NIEA)¹ and the Northern Ireland Raptor Study Group (NIRSG)² for an up to date history of breeding raptors in the area. Of special interest may be peregrine falcon and merlin, both Annex 1 listed species under the EU Birds Directive 2009 (codified version)³. There may be species of conservation concern present including curlew, snipe, red grouse and meadow pipit, all of which are of a high or medium conservation concern (breeding populations) across Ireland⁴. We would expect these species to be carefully considered from the site location and design stage.

The Department for Infrastructure (DfI) can be contacted for any available data gathered from any other local wind farm developments⁵. RSPB data can be requested using the link below⁶ where

¹ [NIEA](#)

² [NIRSG](#)

³ [Birds Directive](#)

⁴ Colhoun, K. & Cummins, S. (2013): Birds of Conservation Concern in Ireland 2014-2019 *Irish Birds* 9:523-544

⁵ [Homepage | Planning NI](#)

⁶ [The RSPB: Mapping and GIS: Data requests](#)

access to other data sources can also be found such as the National Biodiversity Network Gateway (NBN)⁷ and the British Trust for Ornithology (BTO)⁸ through our website.

We would expect the ES to provide sufficient information to allow an assessment of the impacts of the proposed development on the environment, in accordance with The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2012⁹. Specific matters to be dealt with are listed below.

Sections one and two detail the survey work and analysis the RSPB feels are necessary to satisfy the requirements of the EIA Regulations, while section three considers the mitigation and enhancement options which could be provided.

1. Survey/desktop study recommendations

Site Designations

We advise that NIEA are contacted regarding nature conservation designations¹⁰ and to view the relevant Area Plans with regard to both statutory and non-statutory designations.

With regards to the location of Natura 2000 sites and connectivity between them and the proposed site, we recommend consultation with NIEA to ensure The Conservation (Natural Habitats, etc) NI Regulations 1995¹¹ are complied with.

Habitats

A full habitat survey should be carried out as part of the ES, at least to JNCC Phase 1 level. The identification of priority biodiversity habitats¹² is particularly important. In particular, active blanket bog is a priority habitat listed under Annex I of Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive). Blanket bog is composed of peat, which is a significant store of carbon as well having an important carbon sequestration role when it is in its active state. The principle aim of wind farm development is to reduce carbon dioxide emissions and combat global warming¹³. Serious consideration must therefore be given to whether the reduction in CO₂ emissions arising from wind farm developments justifies the potential reduction in the carbon storing properties of peatland. Analysis must also take into consideration any additional carbon arising from the projects, such as the manufacture, transport, construction and ongoing maintenance of the turbines and concrete bases¹⁴.

⁷ [National Biodiversity Network Gateway](#)

⁸ Such as The British Trust for Ornithology (BTO); [BTO](#)

⁹ [Planning Regulations](#)

¹⁰ [Protected Areas](#)

¹¹ [The Conservation Regulations](#)

¹² [Priority habitats](#)

¹³ Nayak, D.R. *et al* (2010): *Calculating Carbon Savings from Windfarms on Scottish Peatlands – A New Approach*

¹⁴ Scottish Government (2011): *Calculating Potential Carbon Losses & Savings from Wind Farms on Scottish Peatlands: Technical Note*

Methodologies

The RSPB is of the opinion that in order to satisfy Schedule 4 of the EIA Regulations, i.e. to describe the likely significant effects of the development proposal on the environment, the scoping report should give an indication of the survey methodologies that will be employed during the EIA process. These methodologies will vary according to the species concerned, and the RSPB reserves the right to make further comments once the developer has set out suggested methodologies for each species. We can give further advice on this matter, if required. The scoping document should therefore affirm that the EIA will include a full bird survey carried out at appropriate times of the year, employing stated methodologies and using a reputable ecological contractor. The surveys should cover not only the development site but also areas near the site that may be affected, either directly or indirectly, by the development.

It is vitally important that approved methodologies are employed, to ensure that the EIA glean all the information necessary in order that an informed view as to the existing nature conservation interest of the site can be reached. In the absence of this, uncertainties will be built into the EIA, which will mean that objections may be lodged to the application on the grounds of an inadequate EIA, and that those who wish to lodge objections may cite the precautionary principle. The need to re-survey the development site and vicinity may hold back the decision over the development proposal by as much as a year.

The following survey methods are therefore recommended for this site for *at least* one full year of survey. Depending on the outcomes of these surveys, another year may be required and should be planned for within the project timeline:

- A modified Common Bird Census (CBC) or a Brown & Shepherd (B&S) survey including non-wader observations, over the development site plus 500metre (m) buffer. These can both be done using transects to ensure even coverage, over three visits in specified date windows between mid-March to mid-July.
- Winter surveys using a B&S type survey (i.e. timed visits to specified area), repeated once per month between Oct - March inclusive, and again over the development site plus 500m buffer.
- Vantage point (VP) surveys conforming to Scottish Natural Heritage (SNH) guidelines¹⁵ and targeting raptors i.e. buzzards, that may be using the site/buffer should be considered. We recommend any surveyor (s) involved has experience of VP work and application of collision risk methodology.
- VP surveys conforming to SNH guidelines and targeting migratory waterfowl should be considered¹⁶. We recommend any surveyor (s) involved has experience of VP work for swans/geese.

¹⁵ <http://www.snh.gov.uk/docs/C278917.pdf>

¹⁶ Irish Whooper Swan Study Group (IWSSG); grahammcelwaine@btinternet.com

A transect CBC style survey will pick up records of most breeding waders. However, the B&S methodology can be used to identify breeding waders, where there is suitable habitat (i.e. in upland areas). All reports, field maps and field forms should be retained, even after a development proposal has gained consent, and should be viewed as being in the public domain.

The most up to date guidance available from SNH on surveys, monitoring and assessing the effects of windfarms can be found at the following locations:

- <http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/>
- <http://www.snh.gov.uk/docs/C278917.pdf>
- <http://www.snh.gov.uk/docs/C205417.pdf>
- <http://www.snh.gov.uk/docs/C205416.pdf>

The Scottish Government has developed a carbon calculator to help developers measure emissions savings associated with developments on peatlands using a full life cycle analysis approach. Details can be found below:

- <http://www.scotland.gov.uk/Topics/Business-Industry/Energy/Energy-sources/19185/17852-1/CSavings>

NIEA advocate Planning Policy Statement 18 Renewable Energy (PPS18)¹⁷ and have also developed the following advice note on active peat to help guide potential developments on peatland sites:

- <https://www.daera-ni.gov.uk/sites/default/files/publications/doe/natural-guidance-NIEA-natural-heritage-development-management-team-advice-note-2012.pdf>

In addition, the following peer reviewed papers discuss breeding bird distribution and foraging raptor activity on existing windfarms and report on both spatial and temporal disturbance levels to certain upland species:

- Pearce-Higgins, J. W et al. (2009): The distribution of breeding birds around upland windfarms: Effects of windfarms on upland breeding birds. *Journal of Applied Ecology* 2009, 46, 1323-1331
- Pearce-Higgins, J.W et al. (2012): Greater impacts of wind farms on bird populations during construction than subsequent operation: results of a multi-site and multi-species analysis. *Journal of Applied Ecology* 2012, 49, 386-394

We expect these papers to be used to help quantify the potential level of disturbance and loss of species post-construction from proposed sites and therefore aid the choice of suitable sites and

¹⁷ [PPS18](#)

areas of land, on or off-site, for successful habitat management. It is particularly relevant if breeding waders¹⁸ are on or near to a proposed site and/or foraging hen harriers or buzzards are present.

The cumulative impacts of this proposal with any nearby windfarms or other plans or projects, should also be assessed.

2. Analysis

The ES must provide an assessment of the possible impacts of the development on the interests described by the surveys. These possible impacts should include *inter alia* direct impacts, effects due to disturbance and indirect impacts.

The direct, physical impacts on the development should be addressed, including:

- collision risk,
- direct land-take by structures including masts, buildings, roads, tracks, fences and drainage ditches,
- disruption of hydrology, in terms of saturation on the down-slope sides of roads, tracks and drying-out on the up-slope sides,
- the creation of sumps through built development, with consequent saturation and desiccation effects, and
- works associated with the construction of the development, including vegetation and soil/peat removal and storage, borrow pits, temporary compounds etc.

Disturbance effects could arise in each phase of the development – construction, operation and decommissioning. Possible causes of disturbance are noise, vibration, dust, and the physical presence of construction equipment, perhaps providing predator vantage points, and the presence of personnel associated with construction and site security. The RSPB's concern centres on whether disturbance factors would result in birds being forced to relocate to sub-optimal habitats.

Indirect impacts may include:

- agricultural intensification arising from the increased accessibility of the development site and surrounding areas to stock due to construction of roads and tracks, and
- increased public disturbance due to the presence of those who wish the view the turbines from close up, and by virtue of increased accessibility.

3. Mitigation, enhancement and monitoring

Once sufficient information is available to conclude whether the development will have impacts on the site, adverse or otherwise, the ES should outline mitigation measures as appropriate.

¹⁸ Such as snipe and curlew

The broad headings under which the RSPB would be keen to discuss mitigation (without prejudice) would be:

- institution of agricultural management and access regimes which favour important bird species through habitat management and possibly habitat creation,
- time-related restrictions on construction in relation to nesting periods,
- precise location and orientation of built development within the development site, and
- removal of some tracks/roads after construction.

The RSPB advocates *no loss of biodiversity* to development, through appropriate mitigation and compensation where necessary. Finally, we would encourage suggestions on enhancing the biodiversity of the development site and its vicinity and would welcome the opportunity to discuss such concepts with the developer.

Both mitigation and enhancement may happen on or off-site. This can be facilitated through the local community or local landowners and can benefit local biodiversity whilst also providing services such as carbon storage or improved water quality¹⁹.

Monitoring should take place for all relevant species found on site (informed by the surveys). The “Before After Control Impact” approach should be used to add rigour to the process. The RSPB is of the opinion that survey and monitoring results should be published, in order to enhance understanding of the relationships between windfarms and biodiversity.

We reserve the right to make further representations in relation to this matter and if you require further information in relation to issues raised in this letter, please do not hesitate to contact the Assistant Conservation Officer.

Yours sincerely

Assistant Conservation Officer
RSPB Northern Ireland

¹⁹ [Futurescapes](#)

Appendix B

DfI Strategic Planning Division
Clarence Court
10-18 Adelaide Street
Belfast
BT2 8GB

05 February 2018

To whom it may concern,

RE: Application for a 19 turbine wind farm in the townlands of Meenbog, Croaghonagh and Cashelnavean, Co. Donegal (LA11/2017/1134/TBA)

The RSPB is Europe's largest voluntary nature conservation organisation and is supported by over 1 million members, 13 000 of which reside in Northern Ireland (NI). As such we thank you for sending the Environmental Statement (ES) for the above named consultation through to us for comment.

As the proposed development lies in the Republic, we recommend that the applicant consult our sister organisation Birdwatch Ireland (BWI) on the ornithological features of the area and the potential impacts of the proposal on these features as they may possess more site specific data.

We note the low number of hen harrier flights recorded across the site and the subsequent low collision risk for the species. However, without prejudice and should approval be granted, we recommend that the habitat of the proposed areas of tree felling in the vicinity of the turbine locations be managed according to the recommendations in the Scottish Natural Heritage (SNH) guidance "*Wind farm proposals on afforested sites – advice on reducing suitability for hen harrier, merlin and short-eared owl*"¹ to limit the suitability of the wind farm site for hen harrier and thus reduce the risk of collision.

Without prejudice and should approval be granted, we recommend the measures proposed within the ES² and the recommendation below be placed as planning conditions on any decision notice.

¹ Accessed on 01/02/18 at <https://www.nature.scot/sites/default/files/2017-09/Guidance%20note%20-%20Wind%20farm%20proposals%20on%20afforested%20sites%20advice%20on%20reducing%20suitability%20for%20hen%20harrier%20C%20merlin%20and%20short-eared%20owl.pdf>

² Section 7.6 Meenbog Wind Farm Environmental Impact Assessment Report.

Northern Ireland HQ
Belvoir Park Forest
Belvoir Drive
Belfast
BT8 7QT

Tel 02890 491547
Fax 02890 491669

rspb.org.uk

- Unavoidable vegetation clearance from within the site footprint shall occur outside of the bird breeding season which lasts from 01 March to 31 August to avoid disturbance to nesting birds.
- An independent and suitably qualified ornithologist shall be present on site if construction works are required from March to August of any year and operate a stop works authority should disturbance to breeding birds be detected. They should submit surveys to the Planning Authority as agreed to prior of any works commencing on site to avoid disturbance to breeding birds.
- Prior to the commencement of construction a final Hen Harrier Habitat Enhancement Plan shall be submitted and agreed in writing with the Planning Authority incorporating the measures detailed in Appendix 7.7 of the Environmental Statement. This plan should also include a comprehensive monitoring programme for the lifetime of the development.
- Prior to the commencement of construction a final Post-Construction Bird Monitoring Programme shall be submitted and agreed in writing with the Planning Authority incorporating the measures detailed in Appendix 7.8 of the Environmental Statement.

Please do not hesitate to contact the Conservation Officer with any related queries.

Yours sincerely

Conservation Officer
RSPB Northern Ireland

Northern Ireland HQ
Belvoir Park Forest
Belvoir Drive
Belfast
BT8 7QT

Tel 02890 491547
Fax 02890 491669

rspb.org.uk

Emma Prior

From: ESB Networks Customer Service (ESB Networks) <esbnetworks@esb.ie>
Sent: Friday 10 April 2026 09:57
To: Emma Prior
Subject: Re: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment [#1402740]

Follow Up Flag: Follow up
Flag Status: Flagged

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Good Morning Emma,

Thank you for your email.

Can you please confirm if an application has been submitted at this stage for connection. We can certainly follow up once an application is received.

Kind regards,

Jacqui

ESB Networks Customer Care | T: 1800372757 | +353 21 2386555 | www.esbnetworks.ie

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From: eprior@mkoireland.ie

Date: 25/03/2026 03:21 PM

To: corporatecommunications@esb.ie; esbnetworks@esb.ie; salesenquiries@esbtelecoms.ie

Cc: kbourke@mkoireland.ie; koneill@mkoireland.ie; rkennedy@mkoireland.ie; tblackwell@mkoireland.ie

Subject: RE: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal - Minor Amendment

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, Do NOT Click any links or Open any attachments if you were not expecting them.

Dear Sir/Madam,

I am following up on the below scoping request regarding a planning application for Meenbog Wind Farm, in County Donegal, on behalf of Planree Ltd.

Please note that a minor amendment has been made to the site boundary, to account for the inclusion of habitat restoration land. The lands proposed for restoration measures will comprise two blocks of forestry, both located within the townland of Tievecloghoge. It is being proposed that the forestry within these blocks be felled and converted to peatland and scrub habitats. An updated map of the final planning application site boundary is attached.

We would welcome any comments that you might have in relation to the updated site boundary, alongside any other comments you may have relating to the original scoping document. If you could return comments or suggestions before April 1st, 2026, it would be much appreciated.

Kind regards,

Emma.

Emma Prior

Environmental Scientist
MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin

mkoireland.ie | +353 (0)91 735 611

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From: Emma Prior

Sent: Tuesday 23 September 2025 15:09

To: esbnetworks@esb.ie

Subject: 240505 - EIA Scoping Request for Overall Substitute Consent for Meenbog Wind Farm, Co. Donegal

FAO Planning and Environmental Department

Dear Sir/Madam,

On behalf of Planree Ltd., MKO is preparing the following documentation to accompany a planning application for the Meenbog Wind Farm in County Donegal:

- Remedial Environmental Impact Assessment Report (rEIAR)
- Environmental Impact Assessment Report (EIAR)
- Remedial Natura Impact Statement (rNIS)
- Natura Impact Statement (NIS)

Planree Ltd. intends to apply to An Coimisiún Pleanála for substitute consent under Section 177E of the Planning and Development Act, 2000 (as amended). This application seeks permission to retain the partially constructed Meenbog Wind Farm and fully constructed Grid Connection, and for permission for the completion of construction, operation and decommissioning of the Meenbog Wind Farm in County Donegal.

The Subject Development is located in the townlands of Meenbog, Croaghonagh, Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully and Friarsbush, and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 8.3km northeast of Donegal Town.

Please see attached a Cover Letter and Scoping Document providing details of the project. As part of the EIA process, we would welcome any comments that you might have in relation to the Subject Development, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR and EIAR. If you could return any comments or suggestions at your earliest convenience, it would be much appreciated.

If you require any further information, please do not hesitate to contact me.

Kind regards,

Emma.

Emma Prior

Environmental Scientist
MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin

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