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Ballyfeeny Green Energy Project







Request for Further Information (RFI) Response Report

Roscommon County Council Ref No. 2560446

Date: June 2026

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Introduction

This Report has been prepared in response to the Request for Further Information (RFI) issued by Roscommon County Council (RCC) regarding the planning application for the Ballyfeeny Green Energy Project. The response has been compiled by Rowan on behalf of Ballyfeeny Green Energy Ltd.

The proposed Project comprises six wind turbines, all associated infrastructure including Turbine Foundations, Turbine Hardstands, Access Tracks, Wind Farm Internal Cabling, Relay Tower, Onsite Substation, Installation of approximately 5.8km of permanent underground electrical cabling for the grid connection, including cabling within the public road corridor, extending from the proposed on-site 38kV Substation at Ballyfeeny to the junction of the R371 and the Sliabh Bawn Substation Road and all associated infrastructure. The proposed Project is located within Ballyfeeny and adjacent townlands, County Roscommon.

The planning application for the proposed development was submitted to Roscommon County Council on the 15th of September 2025, and the RFI was received on 23 December 2025. A response to the RFI is to be made within 6 months of the date of the request.

The applicant has not proposed any changes to the proposed Project, nor have there been any changes to the statements of significance concluded in the EIAR and NIS.

Purpose and Structure of this Report

This purpose of the Report is to provide a point-by-point response to each of the requests for further information (RFI) from the Planning Authority.

The Report mirrors the structure of the RFI, with each of the requests set out in the document for clarity and ease of reference. The response to each request is then provided below the request text in dark blue colour font.

The document is supported by several other documents and drawings that form part of the overall RFI response. This is detailed below, which shows the full set of documents that make up the RFI response and these documents are referenced in **bold** through this Report.

The additional supporting documentation appended to this Report are:

- **RFI Appendix 1.1** - Planning Drawings:
    - Updated Drawings from original planning documentation:

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- 23604-304 - Grid Route Site Layout Map 4 of 8
- 23604-352 - SE2 & SE3 - Site Entrance No. 2 & 3 Sight Lines
- 23604-353 - SE4, SE5 & SE6 - Site Entrance No. 4, 5 & 6 Sight Lines
- 23604-402 - Drainage Details 3 of 5
- 23604-406 - Drainage Measures at Turbine Base Construction
- 23604-560 - Typical 38kv Cable Trench Details Through Public Road
- 23604-561 - 38kV Single Circuit Joint Bay & Communications Chamber Details
- 23604-562 - Typical Horizontal Directional Drilling Details
- 23604-563 - 38kV Service/Culvert Under Crossing Detail
- 23604-564 - 38kV Service/Culvert Above Crossing Detail

- Additional Drawings provided for clarification in response to the RFI:

  - 23604-280 - Wheelwash & Concrete Washout Area Site Layout
  - 23604-600 - Enabling Works - Tree and Hedge Removal with Advance Drainage Key Plan
  - 23604-601 - Enabling Works - Tree and Hedge Removal with Advance Drainage 1 of 8
  - 23604-602 - Enabling Works - Tree and Hedge Removal with Advance Drainage 2 of 8
  - 23604-603 - Enabling Works - Tree and Hedge Removal with Advance Drainage 3 of 8
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  - 23604-605 - Enabling Works - Tree and Hedge Removal with Advance Drainage 5 of 8
  - 23604-601 - Enabling Works - Tree and Hedge Removal with Advance Drainage 6 of 8
  - 23604-607 - Enabling Works - Tree and Hedge Removal with Advance Drainage 7 of 8
  - 23604-608 - Enabling Works - Tree and Hedge Removal with Advance Drainage 8 of 8

- **RFI Appendix 1.2** - Roads & Transportation Meeting Summary and Outcomes
- **RFI Appendix 12.1** – Response to RFI Item 12
- **RFI Appendix 13.2** – Appendix 6.5 Ornithology Revision 01
- **RFI Appendix 16.1** – Additional Photomontages

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- **RFI Appendix 30.1** – Landowner Folios

Statement of Authority

This RFI Response Report has been prepared by Rowan Engineering Consultants Ltd., (Rowan), with specialist inputs from competent experts, where relevant. **Table 1-1** lists the competent experts involved in the preparation of the response to this RFI.

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Table 1-1: Competent experts involved in the preparation of this RFI response document

Item	Company Name	Expert	Credentials and Experience
1 – 5 & 25	Mable Consulting Engineers Ltd.	Barry McGinn and Eoin Roche	Mr. Barry McGinn is a Chartered Engineer with over 29 years' experience in the design, construction and project management of civil and structural engineering projects including; Wind Farms, Solar Farms, Battery Storage, Electrical Substations, Flood Alleviation, and multiple other development types. Barry is a member of Engineers Ireland and holds a BSc (Eng) in Structural Engineering, BEng (Ord) in Civil Engineering and Post Graduate Diplomas in Planning and Environmental Law, Construction Law & Contract Administration and Project Management. Mr. Eoin Roche is a Project Engineer with over 6 years of experience in the design and construction of civil and structural engineering works, as well as renewable energy infrastructure projects. His portfolio includes Wind Farms, Solar Farms, Battery Energy Storage Systems (BESS), Synchronous Compensators and Electrical Substations. Eoin holds a Bachelor of Engineering (Hons) in Structural Engineering and a Postgraduate Diploma (Distinction) in Sustainable Energy and the Environment.
6 - 9	DM Environmental Consulting Ltd.	Denise Meade	Denise has over 23 years' experience working on both public and private sector developments. Her experience lies in the environmental co-ordination of large infrastructure projects across a range of industries including renewable energy, roads, water and wastewater. She has managed all aspects of planning

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Item	Company Name	Expert	Credentials and Experience
			applications, with a focus on the technical review and delivery of EIARs. She is a Chartered Environmentalist (CEnv) and Chartered Water and Environmental Manager (C.WEM) and hold an MSc in Applied Environmental Science and AdvDip in Planning & Environmental Law.
10 – 11, 17 – 19 & 24	Inis Environmental Consultants Ltd.	Dr. Alex Copland and Conor Daly	Dr. Alex Copland BSc PhD MIEnvSc MCIEEM (Technical Director, INIS) has over 30 years of professional experience working in both statutory and private companies, in third-level research institutions and with environmental NGOs. He is a full member of the Institute of Environmental Sciences (IES) and the Chartered Institute of Ecology and Environmental Management (CIEEM). He is proficient in experimental design and data analysis and has managed several large-scale, multi-disciplinary ecological projects, managing staff and resources to meet budgetary constraints and the successful delivery of projects on time. These have included research and targeted management work for species of conservation concern, ecological assessments (including fieldwork and reporting) for large-scale infrastructure projects (including Strategic Infrastructure Developments) and delivering successful planning outcomes, the design and delivery of practical conservation actions with a range of stakeholders and end-users, education and interpretation on the interface between people and the environment and the development of coordinated, strategic plans for birds and biodiversity. In relation to windfarms, Alex has overseen the delivery of technical (ecology) inputs into eight wind farm EIAR chapters in Ireland, totalling nearly 100 turbines and a generation capacity

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Item	Company Name	Expert	Credentials and Experience
			exceeding 350 MW. He has written numerous scientific papers, developed and contributed to evidence-based position papers, visions and strategies on birds and habitats in Ireland. He also sits on the Editorial Panel of the scientific journal, Irish Birds, which publishes original ornithological research relevant to Ireland's avifauna, and CIEEM'S Irish Policy Group. Conor Daly MSc BSc (Hons.) ACIEEM (Ecologist, INIS): Conor is the Report Team lead with INIS and reviewed the biodiversity chapter and the accompanying technical appendices. Conor has experience writing PEA, AA Screening, NIS and EIA reports since 2021 for small urban developments across Ireland involving sensitive receptors such as Lesser Horseshoe Bat, active Badger setts and riverine habitats. He has also contributed to the drafting, finalising and issuing of EcIA, EIA and NIS reports over 3 years on renewable energy projects, including: • 22 turbine, 92.4 MW windfarm in Co. Tipperary; • 11 turbine, c.62 MW windfarm in Co. Clare; • 8 turbine, 30.4 MW windfarm in Co. Waterford; • 11 turbine, c.66 MW windfarm in Co. Kilkenny; • 6 turbine, 25.2 MW windfarm in Co. Clare; and • 4 turbine, 18.0 MW windfarm in Co. Donegal
14	Macroworks Ltd.	Peter Connell	Peter Connell, GIS and LVIA Consultant (BA, MPhil, MSc) of Macro Works Ltd., a specialist landscape and visual assessment company with over 20 years'

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Item	Company Name	Expert	Credentials and Experience
			experience in the appraisal of visual effects from a variety of energy, infrastructure and commercial developments, including landscape and visual impact assessments, and glint and glare assessments. Peter has previously prepared shadow flicker impact models and assessments for inclusion in Environmental Impact Assessment Reports.
15 & 29	Rowan Engineering Consultants Ltd.	Jesscia Boyd	Jessica is a Senior Environmental Consultant, having joined Rowan Engineering Consultants Ltd., in February 2024 with over 7 years' experience in Environmental Impact Assessment, in relation to Pharmaceutical, Aggregate Industry and Onshore Wind Developments. Additionally, Jessica's experience includes Environment and Planning preparation for Onshore Wind, Solar and Battery Energy Storage Systems across Ireland. Jessica holds a BSc in Environmental Management and MSc in Spatial Planning: Cities, Water & Climate Change.
16	Macro works Ltd.	Cian Doughan	Cian Doughan, Associate Director (BSc. Landscape Architecture and Member of the Irish Landscape Institute (MILI)) of Macro Works Ltd, with eight years of experience working on numerous wind farm applications (including 10+ SID Wind Farm application) and other renewable energy infrastructure.
20 - 23	Enfonic	Gary Duffy	Gary Duffy, BEng, MIOA (Principal Consultant**)** is the managing director of Enfonic with over 25 years' experience as an acoustic engineer and consultant. He has extensive knowledge in the field of noise measurement, prediction, and impact assessment. He co-wrote the EPA's original guidance

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Item	Company Name	Expert	Credentials and Experience
			note on noise and represented the Institute of Acoustics (IOA) on the technical advisory committee of the Department of the Environment's revision of Part E (Sound Insulation) of the Building Regulations. He is a founder member of the Irish branch of the Institute of Acoustics and a sitting member of the current committee. His expertise in wind turbine noise analysis, modelling and assessment is recognised industry-wide, and he has delivered training courses on the subject to many of the country's acoustic consultants. As principal consultant, he ensures the acoustic and wider environmental technical aspects of our assessments are rigorously applied to our assessments. Moreover, he ensures that the information and insights in our reports are provided as concisely and as understandable as possible.'
26 - 28	JBA Consulting	Conor O'Neill	Conor O'Neill BA (Mod) MSc Adv Dip has 5 years of environmental consultancy experience. He has been involved in all aspects of EIAR, from Screening and Scoping to EIAR co-ordination and chapter authoring for numerous projects, along with other developments including transport infrastructure, renewable energy, residential, and commercial.

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Roads and Transportation

1. RFI Item 1

The Planning Authority has concerns in relation to the long-term effect that the proposed works will have on the public road network and as such, further details in relation to the proposed grid connection infrastructure proposals are required in accordance with the items detailed below.

1. Response to RFI Item 1

It is noted that following receipt of the RFI, a meeting was held with Roscommon County Council Roads Division (RCCRD) on 22nd January 2026 to discuss RFI Items 1 to 5 (Road-related items). Outcomes from this meeting are appended in **RFI Appendix 1.2 – Roads and Transportation Meeting Summary and Outcomes**.

1.1 RFI Item 1.1

It is a requirement of the local roads authority, that where it is not possible to locate the cabling outside of the public road that the preferred position for the cabling shall be as near as possible to the centre of the lane outside of the wheel track. Grid connection plans and particulars are required to reflect this requirement.

1.1.1 Response to RFI Item 1.1

During the meeting, RCCRD confirmed that it is a requirement for the grid connection to be located as near as possible to the centre of the lane outside of the wheel track. This approach will reduce the extent of wheel tracking along the grid route and thus reduce the risk of road surface wheel rutting. A detail has been added to updated **Planning Drawing 23604-560 included in RFI Appendix 1.1 – Planning Drawings** to confirm that the grid connection is to be constructed in the centre of the carriageway lane, in accordance with Roscommon County Council's requirements.

1.2 RFI Item 1.2

A ground investigation survey is required to be completed by the applicant to establish the existing condition of the road and to inform the most appropriate form of reinstatement, the details of which

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are required to be agreed with Roscommon County Council Roads Department prior to compliance with this notice

1.2.1 Response to RFI Item 1.2

As agreed with RCCRD, Ground Investigation (GI) Surveying (such as Slit Trenches and / or Trial Holes) will be undertaken in advance of construction works to establish the existing condition of the road. The GI survey results will be submitted to Roscommon County Council as part of the preparation of the details required to obtain the Road Opening Licence.

The findings of this survey will inform the most appropriate of reinstatement works, which will be agreed with RCCRD prior to commencement of development.

A note outlining the above has been incorporated into updated **Planning Drawings 23604-560** to **564**. These drawings are included in **RFI Appendix 1.1 – Planning Drawings**.

1.3 RFI Item 1.3

Ground Penetrating Radar (GPR) survey of all services is required to be carried out to identify clashes with high pressure watermains, MD fibre optic cables etc with letters of consent from Éireann, EIR, NBI etc where clashes require proposed 38KV power cable ducting to be beneath these existing services and still achieve the minimum depth as per the 'Interim Guidance' from DoT and RMO.

1.3.1 Response to RFI Item 1.3

As agreed with RCCRD, Ground Penetration Radar (GPR) Surveying will be undertaken in advance of construction works to assess the make-up of the road structure and to identify the exact location of underground services and constraints. The GPR survey results will be submitted to Roscommon County Council as part of the preparation of the details required to obtain the Road Opening Licence.

Where it is necessary for the proposed 38kV power cable ducting to pass beneath existing services, letters of consent will be obtained from the relevant utility providers in advance of construction.

The 38kV power cable ducting will be designed to achieve the minimum depth requirements as per the Department of Transport (DoT) and Roads Management Office (RMO) publication -

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'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'.

Where it is not possible to achieve the minimum cover depth, for example at a service crossing, and where alternative solutions such as undercrossing are not feasible; the minimum cover depth may be reduced to approximately 700mm subject to agreement with Roscommon County Council on a case-by-case basis.

A note clarifying the above has been incorporated into the revised **Planning Drawings 23604-560** to **564**. These drawings are included in **RFI Appendix 1.1 – Planning Drawings**.

1.4 RFI Item 1.4

A GIS survey of all installed ducting, joint pits and any underground ancillary equipment or pits along the cable ducting route on Regional/National routes is required to be carried out. The GIS survey shall be to ITM coordinates.

1.4.1 Response to RFI Item 1.4

As agreed with RCCRD, an "As-Built" GIS survey, to ITM Coordinates, of all installed ducting, joint pits, and underground ancillary equipment or pits along the grid route will be carried out, to Roscommon County Council's requirements, as the grid works are installed, and will be provided to Roscommon County Council on completion.

A note outlining the above has been incorporated into updated **Planning Drawings 23604-560** to **564**. These drawings are included in **RFI Appendix 1.1 – Planning Drawings**.

1.5 RFI Item 1.5

It is a requirement that all ducting laid in the public road shall be placed at a minimum depth of 0.950m below finished road surface level in accordance with 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. Grid connection plans and particulars are required to reflect this requirement.

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1.5.1 Response to RFI Item 1.5

Ducting laid in the public road will have a minimum cover depth of 950mm below finished road surface level in accordance with the DoT and RMO publication - *'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'*.

Where it is not possible to achieve the minimum cover depth, for example at a service crossing, and where alternative solutions such as undercrossing are not feasible, the minimum cover depth may be reduced to approximately 700mm, subject to agreement with Roscommon County Council on a case-by-case basis.

Notes clarifying the above have been incorporated into the revised **Planning Drawings 23604-560** to **564**; these drawings are submitted as part of this response and are included within **RFI Appendix 1.1 – Planning Drawings**.

1.6 RFI Item 1.6

Detailed design drawings over the full extent of the proposed grid connection route are required and shall clearly demonstrate how the proposed works will impact existing services in the public road. In this context, please also provide detailed cross section drawings showing trench depths required so as not to affect existing services.

1.6.1 Response to RFI Item 1.6

Following discussions with RCCRD, a note providing further clarity in relation the cross section details together with trench depths in regard to the grid connection has been incorporated into revised **Planning Drawings 23604-560** to **564**. These drawings are included in **RFI Appendix 1.1 – Planning Drawings**.

Design drawings over the full extent of the proposed grid connection will be prepared in advance of construction works. These drawings will include detailed cross sections showing trench depths and will clearly demonstrate how the proposed works will avoid adverse impacts on existing services in the public road. In accordance with best practice, the drawings requested will be provided prior to construction.

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1.7 RFI Item 1.7

Proposed joint bays are to be considered as having a structural element and should be treated as such. Top of Joint Bay levels are required to be a minimum depth of 300mm below the road surface. Grid connection plans and particulars are required to reflect this requirement. Structural designs are in addition, required to take into account waterproofing requirements for a buried concrete structure in accordance with TII specifications.

1.7.1 Response to RFI Item 1.7

Joints bays have been designed as structural elements and that where possible these will be located off the public road. Joint bays have a cover slab, noted as 250mm below the road surface in **Planning Drawing 23604-561** submitted with the planning application in September 2025.

Planning Drawing 23604-561 has been updated. The 250mm dimension has been revised to reflect the 300mm requirement as requested in the RFI. This drawing is included in **RFI Appendix 1.1 – Planning Drawings**.

A note has also been added to **Planning Drawing 23604-561** to confirm that the structural design for the joint bays will incorporate waterproofing requirement as per Transport Infrastructure Ireland (TII) publication '*Specification for Road Works Series 2000 - Waterproofing for Concrete Structures'.*

1.8 RFI Item 1.8

Roscommon County Council will require the applicant to carry out full carriageway reinstatement of all bituminous bound material layers on all public roads where cabling is within the carriageway. In this context, full details of the wearing course and permanent reinstatement are required to be depicted on a separate set of appropriately scaled and annotated drawings. The applicant is required to consult with Roscommon County Council's Road Design Department in advance of submitting proposals in this regard.

1.8.1 Response to RFI Item 1.8

As discussed with RCCRD, full carriageway reinstatement will be carried out of all bituminous bound material layers on public roads where the grid route cabling is within the carriageway. Full details of the wearing course and permanent reinstatement will be detailed on a separate set of

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appropriately scaled and annotated drawings and submitted for agreement to Roscommon County Council prior to construction as part of the Road Opening Licence application.

As part of the specification of the full carriageway reinstatement a combination of intrusive and non-intrusive road investigation survey will be carried out to establish existing pavement construction and condition at the time of the works. The type of surveys carried out will include; slit trenches, trial holes, coring, GPR, Falling Weight Deflectometer (FWD) and Visual Condition Survey.

Carriageway reinstatement will be carried out in accordance with Department of Transport, Tourism and Sport publication *'Guidelines for Managing Openings in Public Roads - Guidelines for the Opening, Backfilling and Reinstatement of Openings in Public Roads',* the DoT and RMO Interim Guidance, Transport Infrastructure Ireland (TII) Specifications, and the requirements of the Roscommon County Council.

Notes outlining the above have been incorporated into updated **Planning Drawings 23604-560** to **564**. These drawings are included in **RFI Appendix 1.1 – Planning Drawings**.

1.9 RFI Item 1.9

The applicant is advised that in the event that the proposed grid connection infrastructure is required to be relocated to accommodate future road development or improvements along the route, the full costs and responsibility of such relocation shall be borne by the developer. The applicant is also advised that the institution of a substantial developer performance bond will be required prior to commencement of any development proposed hereunder as security against any costs Roscommon County Council may incur as a result of necessary maintenance and repair works along the route arising from the proposed development.

1.9.1 Response to RFI Item 1.9

A virtual meeting was held with the Roscommon National Roads Regional Office (RNRRO) on 31st March 2026 and is discussed in further detail within Item 2 of this RFI. During this meeting, the comment in relation to bonds was noted. Ballyfeeny Green Energy Limited are satisfied to accept a condition on any grant of planning permission, to put an appropriate bond in place to cover the costs associated with any maintenance and repair works along the route. Details and outcomes of the meeting are included in **RFI Appendix 1.2 – Roads and Transportation Meeting Summary and Outcomes**.

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2. RFI Item 2

It is noted that EIAR Section 12.6.2 and Table 12-9 refer to the requirement for 60 abnormal length loads in 20 separate convoy events, however, the Statement of Significance of Effects refers to the requirement for 54 abnormal length loads in 18 separate convoy events. In this context, please clarify the number of abnormal length turbine delivery events with the findings of significance of effects set out in EIAR Section 12.6.2, updated to reflect same where applicable. In addition, please confirm if any of the abnormal loads referenced meet the criteria of 'Exceptional Abnormal Load' (EAL – Department of Transport Circular RW18 of 2024). Where the foregoing is the case, structural assessment of all structures to be crossed will be required in accordance with TII Publications AM STR-06048 to verify that they can sustain an 'EAL' load safely.

2.1.1 Response to RFI Item 2

The number of abnormal loads associated with the proposed Project is set out in the Traffic Management Plan provided with the planning application in September 2025 (**EIAR, Volume 3, Appendix 2.1.2 – Traffic Management Plan (TMP)**. There will be 67 abnormal load deliveries, and the breakdown of this figure is as follows:

- 1 no. abnormal load 38 kV transformer delivery (refer to **EIAR, Volume 3, Appendix 2.1.2 – TMP - Section 6.7.2, Table 6-5**); and
- 66 no. abnormal load wind turbine component deliveries (refer to **EIAR, Volume 3, Appendix 2.1.2 – TMP, Section 6.9, Table 6-9**).

No abnormal loads meet the criteria for an Exceptional Abnormal Load (EAL), as defined in the Department of Transport Circular RW18/2024. As there are no EALs, it is not proposed to carry out structural assessments of structures to be crossed.

Table 12-9 of **EIAR, Volume 2**, **Chapter 12 -Traffic & Transport** was informed by **EIAR**, **Volume 3**, **Appendix 2.1.2 – TMP**. The abnormal loads and convoy events detailed in **EIAR, Volume 2 - Chapter 12 – Traffic & Transport** are noted as typographical errors.

Table 12-9 omitted a turbine component from delivery which lead to a shortfall in the number of abnormal load deliveries. **Table 12-9** from **EIAR**, **Volume 2**, **Chapter 12 -Traffic & Transport** is corrected as follows:

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Table 12-9: Turbine Delivery (Number of Deliveries from TMP)

Turbine Component	Number Per Wind Turbine	Number of Wind Turbines	Weight - typical (tonne)	Number of Deliveries
Drive Train	1	6	71	6
Main Bearing Unit	1	6	30	6
Nacelle	1	6	76.8	6
Rotor Hub	1	6	51.6	6
Rotor Blade	3	6	31.8	18
Tower Section 1	1	6	70.4	6
Tower Section 2	1	6	78.3	6
Tower Section 3	1	6	76.9	6
Tower Section 4	1	6	78	6
Total Approximate Deliveries / Loads for Wind Turbine Installation Works				66

The full corrected statement for **Section 12.6.2** is:

In total, there are 67 abnormal loads required during the turbine components and substation construction phase, of which 1 load will be required for the 38 kV Transformer substation and 66 loads for turbine components. The standard approach is to carry out the movement by road during overnight periods when road traffic is lowest. As these vehicles travel at low speed, these will be staged convoy movements which will be completed in accordance with a schedule agreed with An Garda Síochána under the terms of the licence conditions.

Turbine Delivery: It has been set out in **Section 12.6.2, Table 12-9** that the Ballyfeeny wind farm Project will require 67 abnormal length vehicle turbine component deliveries, with an assumed convoy of 3 abnormal length vehicles at a time, resulting in 23 separate convoy events along the TDR, which are proposed to occur during the Construction Phase.

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It is noted that the updated details on abnormal loads and convoy events did not result in a material change to the impact assessment or to the significance of residual effects in the EIAR. No new or additional mitigation measures were required. The assessment continues to conclude no likely significant adverse, direct or indirect effects during the construction phase. The residual effects are considered to be Short-term, Adverse and Not Significant, which is Not Significant in EIA terms.

3. RFI Item 3

Visibility splays of 3x70m have been depicted at facility entrances SE2 and SE3 at their junction with Local Road L-6018, and at facility entrances SE4, SE5 and SE6 at their junction with local road L-60498, whereas Section 12.24 of the Roscommon County Development Plan 2022-2028 Volume 1 prescribes a standard of 90 metre sightlines to an object point (y) on the nearside edge of the public road from the observation point (x) behind the proposed entrance. Please submit revised editions of Drawing No. 352 and 353 to reflect this standard or, alternatively, submit a safety audit to justify any shortfall from the standards set out in RCDP Section 12.24.

3.1.1 Response to RFI Item 3

The visibility splays at site entrances SE2, SE3, SE4 and SE5 have been revised to demonstrate it is possible to comply with the requirements of Section 12.24 of the *Roscommon County Development Plan 2022–2028*. **Planning Drawings 23604-352** & **353** have been updated to reflect the revised visibility splays. These drawings are included in **RFI Appendix 1.1 – Planning Drawings**.

It should be noted for SE4 and SE5, these are located on an unbound public road that is typically used by agricultural and commercial vehicles for access to private lands and commercial forestry. The Applicant considers the requirement of 90m sightlines overly onerous at SE4 and SE5, considering the condition and typical use of the public road. At site entrance SE5, the public road turns through 90 degrees at a distance of 79.3m to the south of the entrance and at this location, the sightline is reduced to take account of the road layout.

It should also be noted, the update in sightline length results in the removal of an additional 23m section of hedgerow at site entrance SE4. It is considered there would be no change to the impact assessment within the EIAR, as this additional loss of hedgerow if required, would be offset by the hedgerow enhancement and new hedgerow planting provisions set out in **EIAR**, **Volume 3**,

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Appendix 6.10 – Species and Habitats Management Plan. As outlined in **EIAR**, **Volume 3 Chapter 6 Biodiversity**, it is considered that there will be a long-term **Significant Positive** residual effect on habitats as a result of the Project.

Site entrance SE6 is a temporary access, used only for a very limited number of abnormal load vehicle movements. For this reason, it is not proposed to provide visibility splays as these would require the temporary removal of long stretches of hedgerow. Instead, it is proposed to operate this temporary entrance under strict traffic management and control procedures. For further detail on this site entrance see the **EIAR, Volume 3, Appendix 2.1 – CEMP, Section 5.7.4.2 Temporary Site Entrance**.

The use of SE6 will be limited to the delivery of abnormal loads associated with Turbine T06, with appropriate temporary traffic management measures implemented to ensure safe operation during these deliveries.

The following traffic management measures will be implemented when using temporary entrance SE6:

- During these deliveries, an “all stop” traffic management system will be implemented on the L60498 in accordance with the Department of Transport, Tourism and Sport publication, *Traffic Signs Manual – Chapter 8: Temporary Traffic Management Operations Guidance for Level 1 Roads (Urban and Low-Speed Roads)*.

Outside of abnormal load movements, SE6 will be secured and closed to all construction traffic. The entrance will be barriered off using Kelly Blocks or similar approved measures; these will only be temporarily removed for the duration of each abnormal load delivery and reinstated immediately thereafter to prevent unauthorised use.

On completion of the final abnormal load delivery to Turbine T06, the entrance will be reinstated with native hedgerow. Notes outlining the above has been incorporated into updated **Planning Drawing 23604-353**. This drawing is included in **RFI Appendix 1.1 – Planning Drawings**.

4. RFI Item 4

Please provide details in plan of the location of the proposed wheel wash and chute outwash facilities indicated on Drawing No. 23604-405.

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4.1.1 Response to RFI Item 4

A new drawing, **RFI Appendix 1.1 – Planning Drawing 23604-280** has been produced to supplement **Planning Drawing 23604-405** submitted with the original planning documentation. **Planning Drawing 23604-280** illustrates, in plan form, the locations of the proposed wheel wash and chute outwash facilities. This drawing is submitted as part of this RFI response and is included in **RFI Appendix 1.1 – Planning Drawings**.

5. RFI Item 5

The proposed development traverses the footprint of the N5 Ballaghaderreen to Scramoge Road Project and will, therefore, impact the project. The Roscommon National Roads Regional Office (RNRRO) has reported that it is a requirement that they are informed of any infrastructure requirements Ballyfeeney Green Energy Limited propose in the vicinity of the N5 Ballaghaderreen to Scramoge Road Project including any impacts, pre, during and post construction of both projects. In this context, engagement with Roscommon National Roads Regional Office (RNRRO) in relation to planned works within the footprint of the N5 Ballaghaderreen to Scramoge Road Project is required, with details of the outcome of this engagement and any associated modifications to the proposals documented in response to this notice.

5.1.1 Response to RFI Item 5

A virtual meeting was held with the RNRRO on 31st March 2026. Details and outcomes of the meeting are included in **RFI Appendix 1.2 – Roads and Transportation Meeting Summary and Outcomes**.

During the meeting, the Project Engineer presented the approach to the Grid Connection Route (GCR) and the Turbine Delivery Route, which are the elements of the proposed Project that directly interact with the N5 Project.

In regard to the GCR, the following was noted:

- The design of the grid route, where it traverses the N5 Project, has been developed to minimise impacts on the N5 Project as far as practicable.
- The design also considers the possibility that the N5 Project could be delayed at this location, ensuring that the proposals remain compatible with the existing road arrangement if required.

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- Relevant planning drawings for the Development and the area of grid interaction were reviewed during the meeting, including:
- **Planning Drawings 23604-300**; Key plan of the Development's grid route.
- **Planning Drawings 23604-304**; Detailed plan of the Development's grid interaction with the N5 Project.
- **Planning Drawings 23604-560 to 564**; Detailed grid drawings
- In relation to traffic management, it is proposed to carry out the works under a single lane closure on the R371, and with no traffic management requirements on the N5, except for information signs relating to the grid works on the R371.

In terms of the Turbine Delivery Route, the following was noted:

- It is proposed to use the N5 Project as part of the Turbine Delivery Route.
- Relevant planning drawings for the proposed Project's Turbine Delivery Route were reviewed during the meeting, including:
    - **Planning Drawings 23604-1000 & 1002** (Key plans of the Development's Turbine Delivery Route)
    - **Planning Drawings 23604-1008** (Detailed swept path analysis (SPA) drawing at the N5/R371 Junction turn-off). The SPA drawing for this junction notes the requirement for hedge removal as well as temporary removal and works to street furniture and the traffic island.

During this discussion, the RNRRO advised the following:

- That as part of the N5 project, a new culvert is to be installed to the drain crossing located approximately 85m north of the N5/R371 Junction. It was suggested that this culvert should be added to the Planning details.
- There will be a bank of 4 TII ducting (2 on 2) most likely on the northern side of the new N5, the direction drilling details should take this into account.
- The new N5 drainage may be up to 2.5m deep and the planning details should note that the new N5 'As Built' drawings are to be obtained from Roscommon County Council and their details incorporated into the horizontal directional drilling (HDD) works by the Project.

As a result of the discussion, it was agreed:

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- That for clarity the N5 project new culvert would be added to the grid plan drawing (**Planning Drawings 23604-304)**.
- The proposed horizontal directional drilling (HDD) at the interaction with the N5 project would pass under this culvert and that details of this would be added to the HDD drawing to provide additional clarify (**Planning Drawings 23604-562**).
- The requirement to coordinate the HDD works with the new TII ducting, the reference to the N5 drainage and reference to the N5 "As Built" drawings would be added to the planning drawings by the Project.

Notes outlining the above have been incorporated into updated **Planning Drawings 23604-304** and **23604-562**. These drawings are included in **RFI Appendix 1.1 – Planning Drawings**. It is noted that the updates made to the above drawings comprise minor amendments and clarifications, to the original submitted drawings in respect of the HDD crossing at this junction.

Assessment of Alternatives

6. RFI Item 6

It is noted that EIAR Section 6 and associated ornithological assessments report the location of an identified protected raptor species nest site within the 750m disturbance distance identified for this species, resulting in potentially significant effects including potential disturbance and displacement effects. It is further noted that the assessment of alternatives set out under EIA Section 3, which refers to baseline avifaunal surveys in the establishment of ornithological buffer zones early in the design phase, does not provide details of assessment of alternatives, including alternative designs which would place proposed construction/operational/decommissioning stage elements of the proposed development which may cause disturbance or displacement effects, outside of this prescribed distance from sensitive receptors. Please provide an updated assessment of alternative designs to reflect the above considerations.

6.1.1 Response to RFI Item 6

EIAR, Volume 2, Chapter 3 – Consideration of Reasonable Alternatives presents a comprehensive assessment of reasonable alternatives, including the 'Do Nothing' alternative and alternative locations, layouts/designs, processes and mitigation measures.

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A range of site constraints were taken into account to confirm the project design, including location of county roads, watercourses and land drains, residential receptors, landowner boundaries, telecommunication links, ecologically sensitive receptors, areas of deep subsoil and peat depositions, archaeological sites and visually sensitive areas. This involved input from a number of specialists incorporating information from the initial surveys and site investigations.

As discussed in **EIAR, Volume 2**, **Chapter 3 – Consideration of Reasonable Alternatives**, **Section 3.7.2**, the baseline avifaunal surveys commenced before the final design process, as two years of baseline data was collected in line with current guidelines. During this process, the potential for disturbance of the Peregrine falcon was identified by the ornithologist.

EIAR, **Volume 2**, **Chapter 6 – Biodiversity** describes the implementation of construction phase mitigation measures for the Peregrine, if the nest is determined to be active. The species-specific buffer published in the NatureScot Guidance (2022) for Peregrine falcon during the breeding season is 500-750m, or 200m during the non-breeding season.

Section 6.7.2 details the implementation of a 750m buffer (the largest buffer requirement indicated in the guidance) from any identified nest to the nearest construction works during the Peregrine nesting season. A 200m buffer in accordance with guidance will be enforced at all other times.

In this regard, the application of the 750m buffer relates to a construction phase best practice embedded mitigation. This is not a threshold relevant to the siting of turbines or the final operational requirements of the site.

The key operational phase consideration for Peregrine is the risk of collision for young inexperienced birds that have initially fledged and are engaging in flight practice. During this phase, **Section 6.7.3** details that a programme of monitoring and daylight curtailment will be implemented, in the years that the nest is confirmed to be active.

For decommissioning, the mitigation measures proposed for the construction phase, coupled with measures from any updated surveys will be implemented. These measures are detailed in **Section 6.7.4**.

It is considered that with the implementation of these mitigation measures for the construction, operation and decommissioning phases, there will be no significant residual effects on Peregrine as outlined in **Table 6-26 Summary of effects**.

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The assessment of reasonable alternatives including alternative designs, which took into account the effects of the Project on the environment, is considered robust and appropriate. The final design minimises environmental impacts to the extent possible whilst maximising the renewable energy generation potential of the site.

The final site design assessed in the Environmental Impact Assessment Report (EIAR) is an appropriate and reasonable design which incorporates the 750m buffer construction phase mitigation for Peregrine. This buffer is an appropriate construction phase mitigation and is in accordance with best practice. This 750m buffer is not required or relevant to the final siting of turbines.

The assessment of alternatives adheres to the requirements of Article 5 of the EIA Directive, Schedule 6 of the Planning and Development Regulations 2001 (as amended), European Commission Guidance Document (EU, 2017) on the preparation of EIAR's and the EPA Guidelines (2022). No further assessment is required.

7. RFI Item 7

EIAR Figure 3-3, 'Alternative Siting – Site A and Potential Constraints' appears to identify three 'Alternative Sites' labelled 'A'. It is not readily apparent following review of Section 3.6 of the EIAR to which of these three sites the assessment in Table 3.3 relates. Where three different sites have been shortlisted, key findings tables should be provided for each of the three alternative sites selected.

7.1.1 Response to RFI Item 7

EIAR, **Volume 2, Chapter 3 – Consideration of Alternatives Figure 3-3 Alternative Siting – Site A and potential constraints** presents key constraint details for Site A which was one of the alternative locations considered. The letter 'A' is detailed at three locations in the figure. This represents one large site connected over three land parcels, with the site running from North to South on the figure. The Applicant confirms that this information is correct and that the key findings for both the proposed site at Ballyfeeny (Site C) and Site A are presented in **Table 3.2 Summary of key findings on the site chosen for the proposed Project**. No further assessment is required.

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8. RFI Item 8

EIAR Section 3.7.1 sets out that the final layout has been arrived at following a number of revisions and amendments, to take account of various considerations including, inter alia, the requirement for buffer zones, turbine proximity to sensitive receptors and proximity to local residences. It is further noted that Section 2.1 of the Planning & Renewable Energy Policy Statement sets out that having due consideration to the Draft Revised WEDG 2019, and in accordance with best industry practice, the proposed wind turbines have a setback distance of 4 times the tip height (640m) subject to a mandatory minimum setback of 500m, and that the 640m setback distance has been maintained for all sensitive receptors, apart from sensitive receptor 35 (a dwelling) located 599m from proposed turbine T02. Whilst it is noted that SPPR2 of the referenced Revised Draft Wind Energy Development Guidelines refers to exceptions where reduced setback requirements have been agreed with relevant landowners, and that a signed letter of consent has been received from an identified party confirming that the stated party is giving approval to the proposed siting of the wind turbine(s) located within a distance 4 times the tip height of the turbine from any dwelling, it is not readily apparent from this analysis why re-siting options which would place proposed Turbine T02 outside of the four times the Design Option 3 Tip height separation setback distance zone, which has been used as part of design development in acknowledgement of the provisions of the Revised Draft Wind Energy Development Guidelines, standards and best industry practice, for all sensitive receptors including sensitive receptor No. 35, have not been considered. Further analysis in relation to this matter is required, including consideration of the rationale behind why it was considered necessary in the examination of alternative siting options to exceed this stated industry best practice standard, requiring the exception measure discussed above.

8.1.1 Response to RFI Item 8

The **EIAR, Volume 2, Chapter 3 – Consideration of Reasonable Alternatives**, describes how the proposed layout for the site was developed as an iterative process incorporating information from a range of site constraints to confirm the final project design. This included turbine proximity to sensitive receptors.

The approach applied in terms of turbine proximity to sensitive receptors is considered both appropriate and reasonable. The Wind Energy Development Guidelines (WEDG) 2006 and the Draft WEDG 2019 state a minimum setback of 500m. Therefore, the proposed Project exceeds

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the minimum for both guidelines. As discussed in **EIAR, Volume 2, Chapter 11 – Landscape and Visual, Section 11.4**, in the case of the 4 times tip height recommendation for visual amenity contained within the Draft WEDG 2019, only one property falls within the setback area of 640m. The Applicant has engaged with this homeowner, who has provided written consent to a reduced setback, which follows the guidance outlined in the Draft WEDG 2019 which states in "*reduced setback situations, the relevant parties must provide written confirmation to the satisfaction of the planning authority that they have agreed to a reduced setback and have no objection to the proposed wind energy development*".

Receptor No. 35 is located 599m from turbine T02 and the stakeholder has consented to the siting of wind turbines at a distance of 500 meters or greater from the receptor, regardless of the tip height of the turbine. This stakeholder consent accords with the requirements of the Draft WEDG 2019.

A range of other site constraints were also taken into account in considering the turbine layout including location of county roads, watercourses and land drains, landowner boundaries, telecommunication links, ecologically sensitive receptors, areas of deep subsoil and peat depositions, archaeological sites and visually sensitive areas. An iterative process commenced to determine an optimum turbine layout which took account of any significant site constraints identified during the initial site surveys and site investigations. The layout designs were then also optimised based on the setback requirements from dwellings (based on the WEDG 2006 and with regard to the Draft WEDG 2019 guidance).

The final design assessed in the Environmental Impact Assessment Report (EIAR) is an appropriate and reasonable design that where possible, minimises environmental impacts whilst maximising the renewable energy generation potential of the site. The design demonstrates compliance with WEDG 2006, regard to the draft WEDG 2019 whilst also achieving the requirements of other key site constraints, technology and infrastructure requirements for the site.

The consideration of turbine proximity to sensitive receptors is considered appropriate. reasonable and in accordance with the guidelines. The assessment in **EIAR**, **Volume 2, Chapter 3 – Consideration of Reasonable Alternatives** adheres to the requirements of Article 5 of the EIA Directive, Schedule 6 of the Planning and Development Regulations 2001 (as amended), European Commission Guidance Document (EU, 2017) on the preparation of EIAR's and the EPA Guidelines (2022). No further assessment is required.

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9. RFI Item 9

Following receipt of a consultation response from TII in relation to this matter, and in addition to the grid connection alternatives assessed under EIAR Section 3.7.6, please update this assessment to provide further consideration of route alternatives for grid connection, including alternatives to grid connection routing in the public road.

9.1.1 Response to RFI Item 9

EIAR, **Volume 2**, **Chapter 3** – **Consideration of Reasonable Alternatives**, **Section 3.7.6** details the assessment of alternative grid connections. A number of initial connection locations and routes were evaluated which comprised underground and possible overhead sections. These options were reviewed with EirGrid and it was confirmed that the Sliabh Bawn 110kV substation would be the preferred connection method as this substation has an existing spare 110kV bay.

A key consideration in confirming the grid connection routing for the proposed Project to Sliabh Bawn was the potential for environmental effects. At the outset, overhead lines (OHL) were not considered a reasonable alternative at this location due to the potential for visual and landowner effects. Reference is also made to the Draft WEDG 2019 that note:

> *'..In general, it is considered that underground grid connections for wind energy projects are the most appropriate environmental and/or engineering solution, particularly in sensitive landscapes where the visual impacts need to be minimised. Therefore, this should be the default approach. However, there may be cases where specific ground conditions would prevent this, e.g. in upland locations where peat stability issues can arise form large-scale excavation.'*

On this basis, the OHL's were not assessed as a reasonable alternative to Sliabh Bawn within **EIAR**, **Volume 2**, **Chapter 3 – Consideration of Reasonable Alternatives**.

In consideration of underground grid connection alternatives, a route through private lands was not considered a reasonable alternative due to potential greater environmental effects on traffic, biodiversity, soils, water and air quality. A route through private lands would also present increased landowner requirements including wayleaves on either side of the cable route and facilitating access tracks along the grid route. An underground grid connection through private lands was therefore not considered a reasonable alternative for assessment in **EIAR**, **Volume 2**, **Chapter 3 – Consideration of Reasonable Alternatives**.

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It is noted that the 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 (Department of Transport, 2026) recognises that whilst the primary function of the road network is to provide '*safe transportation of people, goods and services…'*, all public bodies are also committed to carrying out their functions in a manner that supports renewable energy 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*.'

On the basis of the above, the underground grid connection to the existing Sliabh Bawn substation using the public road was considered an optimal solution, likely to have the least environmental effects and, utilising the existing road corridor. It was brought forward as the preferred grid connection route for detailed assessment in the EIAR.

The consideration of the grid connection route in **EIAR**, **Volume 2**, **Chapter 3 – Consideration of Reasonable Alternatives** is considered appropriate and reasonable. No further assessment is required.

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Biodiversity

10. RFI Item 10

It is noted that a confirmed nest site for an identified raptor species (listed under Annex I of the EU Birds Directive), has been identified at a location in close proximity to three turbines proposed hereunder, that confirmed breeding attempts at this site have been recorded and that potential impacts to this species from disturbance/displacement, and via direct collision mortality without adequate mitigation, have been identified within the EIAR. In addition to the assessment of effects provided under EIAR Section 6.6, please provide further analysis of the potential for disturbance and displacement effects on this Annex I species within the zone of influence of the proposed development arising from repetitive disturbance, and associated potential for heightened risks of nest failure occurring during the construction, operational and decommissioning phases of the proposed development, both by themselves and in combination, and their potential by reason of their nature, frequency or duration to have the potential to override any potential habituation behaviors this species may exhibit to repeated disturbance events within construction and operational settings leading to nest failure. Where following this assessment, likely significant effects are identified, appropriate mitigation measures should be considered.

10.1.1 Response to RFI Item 10

As confirmed in **EIAR**, **Volume 2**, **Chapter 6 – Biodiversity**, **Section 6.7.2** mitigation measures have been included for this species. This includes buffer zones for nesting birds within and outside of the core breeding/nesting period (April 1st to 30th September). Additionally, the Ecological Clerk of Works (ECoW) and Project Ecologist will work in concert for pre-construction and construction surveys to confirm when nests are empty to amend construction schedules, and to ensure no works take place within 750m of the Peregrine nest located East of the proposed Project.

Mitigation measures addressed within **Section 6.7.2** for construction phase measures in consideration of habitat management and timing of works established post-mitigation assessment of "not significant" for the Construction, Operational and Decommissioning phase in the context of the existing on-site sources:

> *'In regard to foraging, the effects of disturbance and displacement on Peregrine are considered **not significant**. This is primarily due to the species having a large core foraging range (2-18km, SNH, 2016). Furthermore, its recorded use of the proposed*

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Project for foraging is low, and there is wide availability of displacement habitats in the vicinity of the Site boundary. The potential disturbance and displacement effects on breeding Peregrine is of more concern during the operational phase of the Project. As stated previously in ***Section 6.8.4*** *a disturbance buffer of 750m is advised for nesting Peregrines (Ruddock & Whitfield, 2007). The Peregrine nest site is located 686m west of T06 within an active quarry, which is regularly disturbed by human activity. Birds nesting in active quarries appear to be more tolerant of disturbance although their reactions can depend on whether disturbance occurs inside or outside quarry-working hours (Ruddock & Whitfield, 2007). The Peregrines have become accustomed to the ongoing and regular disturbance of the quarry as evidenced by their return to the same nest site a year later. Due to the intervening distance of the nest site in relation to the Site boundary, the extensive availability of foraging habitat in the vicinity of the Project and known tolerance to disturbance at the recorded nest site, it is likely that any disturbance and displacement impacts on Peregrine during the operation phase of the Project is* ***not significant****.'*

Construction, operational and decommissioning phase disturbance impact sources were assessed assuming the worst-case scenario for sources, including persistent and regular disturbance sources during construction, operational and decommissioning works. Due to the lack of high-quality foraging habitats for Peregrine within the proposed Project, it is not considered likely that this species will forage within the vicinity of the proposed Project. Therefore, it is considered that Peregrine will not be subject to repetitive disturbance events during the construction, operational and decommissioning phases. Any disturbance effects in such low-suitability habitat are considered to be negligible in a worst-case scenario. Furthermore, the proposed curtailment mitigation measure will also ensure no significant operational disturbance or displacement takes place during the fledging period for Peregrine

Additionally, Bird Population Monitoring and Avian Mortality Monitoring will be carried out during the operational phase, and as stated in **Section 6.13** and **Section 6.8.2.2**, *'If an adult Peregrine carcass is found between April 1st and July 30th the nest will be assessed to determine whether the nest has been abandoned or if a chick extraction to rear the chicks in captivity is required.'*

In the professional opinion of the authors, the assessment of disturbance and displacement effects on Peregrine during the construction, operational and decommissioning phases within **EIAR**, **Volume 2**, **Chapter 6 – Biodiversity** is robust and in accordance with best practice guidelines and therefore no further assessment is required.

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11. RFI Item 11

Further to the above, it is noted that descriptions of mitigation measures under EIAR Section 6.7 and Section 3.2.2 of the Species and Habit Management Plan indicate that the risk of an identified Annex I raptor species collision is likely to be highest when inexperienced young birds are initially fledged and engaging in flight practice and that real time monitoring of the breeding location through the breeding season is proposed as mitigation. It is, in addition, noted that it is reported that an alternative approach "might be to turn off the required turbines immediately when the young birds are becoming active in the morning (which will vary between days based on weather) and leave them off until they settle down later in the day (which could be for several hours) which would require daily on-site monitoring for the duration of the nesting season". In addition to the concerns set out in relation to assessment of alternatives concerning this Annex I raptor species, it is considered that substantially greater specificity is required in relation to both the nature, extent and duration of the proposed monitoring programme, whether monitoring alone is sufficient for the identification of periods of heightened collision risk and, in addition the precise nature of measures which will be employed in the event of heightened collision risk, including details of the application of turbine curtailment measures and/or systems in the event monitoring or other systems reveal that the potential for collision risk is heightened. Please provide detailed proposed mitigation measures in this regard.

11.1.1 Response to RFI Item 11

As stated in the **EIAR, Volume 2, Chapter 6 – Biodiversity, Section 6.7** and **Volume 3**, **Appendix 6.10 – Species Habitat Management Plan (SHMP), Section 3.2.2**, '*As noted, the above mitigation would only be required in the years when the breeding territory is occupied and when young birds are reared successfully*.'

Additionally, in the **EIAR**, **Volume 3**, **Appendix 6.10 – SHMP**, **Section 5.1** the Peregrine monitoring is detailed further:

> *'Annual Peregrine monitoring will take place throughout the pre-construction, construction and operational phases (Years 1, 2, 3, 5, 10 and 15) of the proposed Project by an appropriately qualified ornithologist. This monitoring should be undertaken in accordance with best practice survey methods (Gilbert et al., 1998; Hardey et al., 2013) and focus on recording the following information:*

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- *The number and locations of active nests;*
- *The timing and success of breeding attempts, notably the number of chicks successfully fledged;*
- *The number and locations of winter roost sites; and*
- *The number of Peregrines present during the breeding and winter seasons.*

The findings of this annual monitoring should be used to guide ongoing management approaches. In addition to monitoring Peregrine, Kestrel will also be targeted as a focal species for pre-construction monitoring. If active Kestrel nests are located, these will be assessed by a suitably qualified ornithologist who will advise of any additional mitigation or management measures to avoid adverse impacts to this species.

Flight Activity surveys will also be conducted following Vantage point methodology as set by SNH (2017) to identify the extent of any nesting adults or fledgling juveniles approaching construction works and active turbines between April and September.'

Collectively, these monitoring measures will allow determination, by qualified ornithological experts, of the status of the Peregrine (and Kestrel) nesting in the vicinity of the proposed Project and will inform the timing, duration and extent of the curtailment requirements as detailed within the **EIAR, Volume 2, Chapter 6 – Biodiversity**, which follows the precautionary principle in line with best available evidence in monitoring high risk raptors at active wind farm sites.

It is important to note that these mitigation measures were considered in terms of approach and delivery by the Department of Housing, Local Government and Heritage (DoHLGH) as detailed in their submitted observations to the Planning Authority.

12. RFI Item 12

Lough Ree SPA is noted to be internationally important for breeding gulls and waders, with a small number of remaining clusters of breeding Curlew nest sites and species rich semi-natural habitats. It is noted that Section 5.8 of the Natura Impact Statement has reported that due to the scale of the project and the extent of likely significant effects to be considered in stage 2, any projects with potential for in-combination effects were screened-in for adverse in-combination effects under the precautionary principle. The projects identified as being screened-in are: Ballyfeeney Rock Quarry, Sliabh Bawn Wind Farm, The Lanesboro to Sliabh Bawn 110kV

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overhead line upgrade, Derryadd Windfarm, Derane Wind Farm and the N5 Ballaghaderreen to Scramoge Realignment Scheme. A consultation response has been received from the Department of Housing, Local Government and Heritage (DHLGH) which reports, inter alia, that a full assessment of the potential cumulative mortality and displacement ex-situ impacts on the Lough Ree SPA Special Conservation Interest (SCI) species from the proposed development should be fully considered at the biogeographic level and that collectively, both consented and proposed energy developments including solar farm developments should be taken into account beyond those projects identified in the Natura Impact Statement (NIS) and EIAR. Projects referenced by the DHLGH in County Roscommon but which have not been scoped-in in the NIS received include; (a) Seven Hills Wind Farm, Co. Roscommon, a Strategic Infrastructure Development with risks identified for the Lough Ree SPA, (b) Carrowkeel Wind Farm, Co. Roscommon, at the pre-planning stage, with reported concerns raised by the DHLGH of potential in-combination impacts with similar projects on the ornithological SCIs of Lough Ree SPA, and additional small-scale wind energy developments in County Roscommon including the Roxborough and Kilcash projects. In order that full consideration may be given to the potential for cumulative ornithological impacts on the Lough Ree biogeographic area collectively, taking into consideration an assessment of the proposed development in combination with other renewable energy developments at various stages of the planning process including those currently at the pre-planning phase, as well as those that have received planning consent, the applicant is required to modify the consideration of in-combination effects in the NIS (including NIS Section 8) relevant in-combination/cumulative assessments in EIAR to give effect to this requirement. Where the foregoing modifies the overall assessment of likely significant effects, appropriately detailed mitigation measures should be incorporated into the NIS, EIAR and associated documents where appropriate.

12.1.1 Response to RFI 12

A review of the Department of Housing, Local Government and Heritage (DoHLGH) consultation response has been undertaken as part of preparing the response to this further information request.

The as submitted Appropriate Assessment Screening Report and Natura Impact Statement (**Volume 6**, **NIS**) provided full consideration of all in-combination effects at both stages of the AA process. As outlined in **Section 5.7** of **Volume 6**, **NIS** any project with potential for in-combination effects were screened-in for adverse in-combination effects under the precautionary principle.

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Scoped-in projects included all wind farms and other relevant projects within 20km of the proposed Project.

The Appropriate Assessment Screening Report and **EIAR**, **Volume 2**, **Chapter 6 Biodiversity** submitted as part of the planning application for the proposed Project, identified whether there were viable Source-Pathways in order to assess the potential for significant effects, as outlined in **Section 3.4** of the **Volume 6**, **NIS** and **Section 6.3.2 EIAR**, **Volume 2**, **Chapter 6 Biodiversity**.

However, to specifically address this RFI item from Roscommon County Council and the DoHLGH submission, the additional projects listed in the RFI and those identified to be within the biogeographic area of Lough Ree SPA are considered further in **RFI Appendix 12.1 Response to RFI Item 12**, for in-combination effects and cumulative effects in the form of displacement and mortality ex-situ impacts on the Lough Ree SPA Special Conservation Interest (SCI) species.

The biogeographic area of Lough Ree SPA is undefined in the RFI issued by Roscommon County Council and the DoHLGH submission. As such in order to establish an appropriate study area for in-combination and cumulative displacement and mortality effects on the Lough Ree SPA, a worst-case scenario biogeographic area Zone of Influence (ZoI) of 20km from Lough Ree SPA was established. This ZoI is considered appropriate and in accordance with Nature Scot (formerly SNH) Assessing Connectivity with Special Protection Areas (SPAs) guidance (SNH, 2016). SNH (2016) provides guidance in relation to the identification of ecological connectivity between proposed development sites and Special Protection Areas. The guidance is also relevant to Ireland for species that are also present in Ireland. The distances for core and maximum dispersal and foraging ranges are drawn from a literature review that examined ranging behaviour across a variety of locations in Britain, Ireland and beyond, not just in Scotland (Pendlebury et al. 2011). The guidance takes into consideration the distances species may travel beyond the boundary of relevant SPAs and provides information on dispersal and foraging ranges of bird species which are frequently encountered when considering plans and projects. It goes on to state that *"in most cases the core range should be used when determining whether there is connectivity between the proposal and the qualifying interests".* Where SPAs are at greater distance from the proposed development than the core foraging distances for their listed SCI species, there is no likely ecological connectivity to the development and so the SPAs are outside the likely Zone of Impact.

According to the SNH (2016) guidance, the largest core foraging distances from SPAs is 15-20 km (based on wintering greylag goose and pink-footed goose). This represents the largest foraging range of all the species listed in the SNH (2016) guidance document.

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A desk study was undertaken including a review of planning files from Roscommon County Council, Westmeath County Council and Longford County Council in order to list the consented and proposed energy developments including solar farm developments within a 20km distance of Lough Ree SPA.

A total of 10 projects have been included for consideration, including the projects listed by DoHLGH and other renewable energy developments identified through the desk study, within the Lough Ree SPA biogeographic area and are assessed in **RFI Appendix 12.1 Response to RFI Item 12**, **Table 1**. These additional projects which are **beyond those projects identified in the NIS and EIAR** as submitted and assessed for the purposes of this response range in distance from 17.9km – 40.6km from the proposed Ballyfeeny Wind Farm Site.

Following the consideration of the renewable energy projects listed in **RFI Appendix 12.1 Response to RFI Item 12**, **Table 1**, within the Lough Ree SPA biogeographic ZoI, cumulative displacement and mortality effects are considered to be unlikely and in combination impacts which would affect the integrity of the Lough Ree SPA will not occur.

From the overview presented in **RFI Appendix 12.1 Response to RFI Item 12**, **Table 1**, it is considered that the conclusion in the EIAR that "there will be no significant adverse effect on the conservation objectives for Golden Plover, or any other SCIs for statutory Sites during the operation phase" and the conclusion in the NIS that "no adverse effect would likely results from in-combination interactions…=no additional mitigation measures are required to prevent or avoid an adverse effect" still stands further to the assessment provided.

Therefore, it is considered that all projects with any likely potential to result in cumulative significant effects or in combination adverse impacts on the integrity of the Lough Ree SPA were appropriately considered in the submitted EIAR and NIS for the proposed Ballyfeeny Green Energy Project and that the assessments are in accordance with all best practice guidance (including OPR, 2021a; OPR, 2021b) and relevant legislation.

As such, no modification of the NIS or EIAR submitted as part of the planning application for the proposed Ballyfeeny Green Energy Project, is considered appropriate or necessary.

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13. RFI Item 13

EIAR Section 6.6 reports that Kestrel is likely to be widespread in the surrounding area due to the extensive presence of suitable habitat, and that results of field surveys also indicate records of numerous sightings during winter and breeding seasons between 2022 and 2024. In the Statement of Likely Significant Effects during construction, two separate record entries are provided for the 2022/2023 winter season which indicate differing numbers of sightings. Clarity is required in relation to this finding. In addition, it is noted that during the operational phase of the proposed development, it is reported that Kestrel is a species at risk from mortality-related effects with a reported worst-case scenario fatality of one collision every 13.08 to 17.04 years for breeding season, and every 14.45 to 18.82 years for winter season (depending upon technology option), which is within the proposed operational lifetime of the project. In view of the foregoing and given that Kestrel is reported as a Red-List bird species of County Importance with a breeding pair within the ecological baseline, please provide further explanation of the rationale for the conclusion under EIAR Section 6.6.3 that Kestrel collision mortality impact represents a potential slight effect, and that predicted collision risk is low.

13.1.1 Response to RFI Item 13

As noted in the RFI from the Planning Authority, two separate record entries are provided for the winter season 2022/2023. **EIAR**, **Volume 2**, **Chapter 6 Biodiversity**, **Section 6.6.2**, provided an assessment of likely significant effects on Kestrel. A typographical error on the season listed in the chapter led to this variance. The second bullet point listed should indicate, winter 2023/2024 surveys, and the corrected statements are as follows:

- Winter season 2022/2023 VP surveys, Kestrel was observed on 13 occasions; and
- Winter season 2023/2024 VP surveys, Kestrel was observed on 20 occasions;

There is no change to the assessment of effects as a result of this typographical error and the residual effects remain as discussed within the chapter.

In relation to the collision risk for Kestrel, and as stated in **EIAR**, **Volume 2**, **Chapter 6 Biodiversity**, **Section 6.6.3:**

> *'Kestrel is a species at risk for high magnitude impacts from mortality related effects. The Worst-case scenario fatality is one collision every 13.08 to 17.04 years for breeding season and every 14.45 to 18.82 years for winter season.'*

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The assessment of effects was based on the most recently available article 12 reporting (2013-2018), national estimates for Kestrel population is 9,918-17,393 individuals. The previous article 12 reporting (2008-2012) had an estimated 12,100-21,220 individuals. As a result, as stated in **EIAR**, **Volume 2**, **Chapter 6 Biodiversity**, **Section 6.6.3**, Kestrel is assessed as follows:

> '*Kestrel is assessed as being of **Medium** Sensitivity. With regular foraging activity recorded within the wind farm Site during the breeding and winter seasons, in the absence of mitigation, the worst-case scenario the impact magnitude would be **Moderate**, resulting in a **Low** impact significance.*'

Due to this, any presence of Kestrel was assessed to be a KER of County Importance and assigned a moderate sensitivity to impacts under the assessment methodology stated in **EIAR**, **Volume 2**, **Chapter 6 Biodiversity**. The estimated fatality rate of between 1.75 and 2.67 (depending on the technology option chosen) over the 35-year operational phase would result in a moderate level magnitude of impact on Kestrel population accounting for this species flight behaviour increasing its vulnerability to collision. The assignment of moderate magnitude was based on the fatalities occurring rarely, allowing an intervening time for population recovery (i.e. the worst-case fatality rate would equate to a collision every 13-14 years). As such, assigning a KER with a County Importance of moderate level of impact on population numbers over the long-term period of 35 years, was determined based on the methodology set out in **Section 6.3** and when assessed was considered likely to have a slight and not significant effect. Although No Significant effects were determined, management measures related to Kestrel are outlined in **EIAR**, **Volume 3**, **Appendix 6.10 – Species and Habitat Management Plan** to reduce prey availability within the hardstand areas of each turbine have been proposed.

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Shadow Flicker

14. RFI Item 14

EIAR Section 15.7 sets out that the applicant, having due regard to the Draft WEDG 2019 and in accordance with best industry practice, has committed to eliminate adverse shadow flicker at dwellings or other potentially affected properties, and that in this regard it is proposed that, for each of the three technology options, each turbine is fitted with an automatic shadow detection and related turbine shut down system which would be triggered during periods where shadow flicker is predicted at any of the identified receptors, until the potential for shadow flicker ceases. It is, however, reported that it may take a short period for complete curtailment to occur, depending on the rotor speed once the pause criteria are met. In this context, the applicant is requested to provide details of the projected time period (using at least two wind speeds representative of normal operating conditions) once pause criterion is met for turbines to come to a stop and eliminate the potential for shadow flicker at sensitive receptors. In the interests of clarity, and given that within the broader 2km study area a 1,380m study area (Section 5.12 WEDG shadow Flicker Guidelines refer) and other 'worst case' and 'expected shadow' boundaries are used to model potentially affected properties, the applicant is also requested to confirm that it is intended that the shadow flicker control system and associated pause criteria will be employed in relation to all of the 219 identified sensitive receptors within the 2km shadow flicker study area. Where the foregoing is not the case, details in relation to how it is proposed this technology will be deployed with respect to identified sensitive receptors and study boundaries is required.

14.1.1 Response to RFI Item 14

There are two main points outlined in RFI item 14, with each dealt with in turn below.

"*The applicant is requested to provide details of the projected time period (using at least two wind speeds representative of normal operating conditions) once pause criterion is met for turbines to come to a stop and eliminate the potential for shadow flicker at sensitive receptors.*"

As outlined in **EIAR**, **Volume 2**, **Chapter 15 – Shadow Flicker, Section 15.6**, having due regard to the Draft WEDG 2019, the Applicant has committed to eliminate adverse shadow flicker at dwellings or other potentially affected properties by means of turbine shutdown technology. Each turbine will be equipped at the manufacturing stage with an integrated automatic shadow

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detection system. This embedded mitigation measure will provide that the turbines are shut down during periods where shadow flicker is predicted at any of the identified receptors, until the potential for shadow flicker ceases.

As part of the response to the RFI, the Applicant has engaged with the turbine manufacturers for each of the Technology Options assessed as part of the **EIAR**, **Volume 2**, **Chapter 15 – Shadow Flicker**. Confirmation was received from the turbine manufacturers regarding projected shutdown response times and the influence of wind speed on these responses. The wind turbine manufacturers advised that there is not a direct relationship between turbine shutdown time and wind speed. Other site-specific operational factors must also be considered, including turbulence, wind shear, wind veer, and prevailing local wind conditions. As such, the pause criteria incorporated into the shadow flicker control system are designed to account for these variables, ensuring that turbine curtailment is both effective and responsive to the actual conditions at the site. The manufacturer for Turbine Technology 1 stated that:

> *"The duration from when a shutdown (pause) command is sent to the turbine and until the turbine reaches steady state idle rotor speed, has been determined to be between 20 and 40 seconds."*

For Turbine Technology 2 the manufacturer stated:

> *"Based on field analysis, the average breaking time to idling speed for the wind turbine technology proposed for Ballyfeeny, is estimated to be between 5 and 40 seconds. It should be noted that braking times of individual wind turbines may deviate, due to varying site conditions, etc."*

The manufacturer for Turbine Technology 3 advised that, once the pause criteria are met, the turbine blades are pivoted out of the wind and positioned at 60 degrees. The turbine is then switched to 'Idle Mode'. The manufacturer stated that, depending on site-specific wind conditions and rotor speed it takes;

> *"around 60 seconds, for the turbine to reach 'Idle Mode.*"

While turbine shutdown times can vary depending on site-specific conditions, the turbine manufacturers advise that the process can take a short period, of up to 60 seconds from the moment the pause criteria are met. In many cases, the actual shutdown duration is considerably shorter (as short as 20 seconds), demonstrating that the integrated shadow flicker control system

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can respond promptly and effectively to mitigate any likely significant adverse effects at sensitive receptors.

"The applicant is also requested to confirm that it is intended that the shadow flicker control system and associated pause criteria will be employed in relation to all of the 219 identified sensitive receptors within the 2km shadow flicker study area."

Based on the results of the **EIAR**, **Volume 3**, **Appendix 15.2 – Shadow Flicker Assessment**, of the 219 identified sensitive receptors assessed within the 2km shadow flicker Study Area, 78 receptors could potentially experience an impact from shadow flicker as a result of the proposed Project, if Technology Option 1 or Technology Option 2 are chosen. Technology Option 3 saw a marginally lower number of potentially effected receptors at 77.

Of those 78 receptors potentially effected by Technology Option 1 and Technology Option 2, 49 have the potential to exceed the WEDG 2006 of 30 hours per year or 30 minutes per day. Technology Option 3 saw 51 receptors which could potentially exceed these figures.

Each turbine will be equipped with an automatic shadow detection system during the manufacturing phase. The control system will calculate, in real-time:

- Whether shadow flicker has the potential to effect nearby receptors, based on pre-programmed co-ordinates for the receptors and turbines;
- Wind speed, which can affect how fast the turbine will turn and how quickly the flicker will occur;
- Wind direction; and
- The intensity of the sunlight.

The system utilises real-time operational data and sun position algorithms to predict when shadow flicker could occur. During the commissioning phase, the shadow detection system will be set up, including programming the coordinates of each receptor where shadow flicker has the potential to occur.

Where the potential for shadow flicker is detected by the sunlight sensors, the relevant turbine(s) will automatically enter a pause mode in accordance with the defined control parameters. This ensures that turbine operation ceases for the duration necessary to eliminate the occurrence of adverse shadow flicker at that receptor. As such, there will be no adverse shadow flicker effects

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at any of the identified sensitive receptors once the proposed shadow detection system mitigation measures have been implemented.

Accordingly, residual shadow flicker effects are considered to be **Imperceptible** and **Not Significant**. In EIA terms, the effect is considered as **Not Significant**.

As outlined in **EIAR**, **Volume 2**, **Chapter 15 – Shadow Flicker**, **Section 15.7**, in the event that complaints of shadow flicker are received, for any of the 219 identified sensitive receptors by the Developer / Site Operator or by the Local Authority, an investigation will take place and the complaints frequency, duration and time of complaints will be considered and specialist modelling software will be used to confirm the occurrence(s). Should the complaint persist, a shadow flicker survey involving the collection of light data will also be carried out at the receptor in which the complaint was made. Further refinement of the shadow detection system will be employed to eliminate adverse shadow flicker occurrence at any of the identified sensitive receptors.

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Population and Human Health

15. RFI Item 15

Under section 5.8.1 (Table 5-11) of the EIAR the construction phase pre-mitigation Statement of Significance of Effects on Human Health associated with surface water and ground water sources has been reported 'significant in EIA terms' (reported as associated with construction phase risks to drinking water sources including Lough Forbes), however under Section 5.6.2 (Table 5-9) potential pre-mitigation effects arising from pollution of surface water and ground water quality and, in addition, on drinking water sources including Lough Forbes and nearby groundwater wells by sediment and hydrocarbons during construction, are rated as 'Not Significant' in EIA terms. Clarification is required in relation to the rationale for this variance in Statements of Significance of Effects on Human Health associated with surface and groundwater sources.

15.1.1 Response to RFI Item 15

The **EIAR, Volume 2, Chapter 5 – Population and Human Health**, **Section 5.8.1** (**Table 5-11**) reported the construction phase pre-mitigation statement of significance of effects on human health associated with surface water and groundwater sources as '**Significant in EIA Terms**'. However, earlier in the assessment **Section 5.6.2 (Table 5-9)** the pre-mitigation effects were recorded as '**Not Significant in EIA terms**.'

EIAR, Volume 2, Chapter 5 – Population and Human Health is supported by the findings of **EIAR, Volume 2, Chapter 8 – Water, Hydrology (Flood Risk Assessment) and Hydrogeology**, **Section 8.8.2** which assesses the potential for accidental pollution of existing water sources and public water supplies.

A typographical error has led to the variances between the Chapters. There is an error in the reported significance of effects on human health associated with surface and groundwater sources in **EIAR**, **Volume 2**, **Chapter 5 – Population and Human Health**.

The full corrected statement for **Section 5.6.2** (**Table 5-9 Construction Stage Effects on Human Health (pre mitigation)** is as follows:

Pre mitigation, **Chapter 8 – Water**, **Hydrology (Flood Risk Assessment) and Hydrogeology** confirmed that any effects on nearby groundwater wells and drinking water sources including

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Lough Forbes during the construction phase would range from **Slight – Significant**. ~~Which is Not Significant in EIA terms.~~

On this basis, pre mitigation, the significance of any effects on human health associated with surface water and ground water sources has also been considered. ~~to be Slight, which is Not Significant in EIA terms~~ In EIA terms, the effect is considered to range from **Significant – Not Significant**.

The full corrected statement for **Section 5.8.1** (**Table 5-11 Residual effects during the Construction phase**) is as follows:

The changes are presented in strikethrough and red font.

> 'Pre-mitigation, the significance of effects on human health associated with surface water and ground water sources has been considered ~~to be is Significant in EIA terms.~~ to range from **Significant** – **Not Significant** in EIA terms. ~~This was associated with construction phase risks to drinking water sources including Lough Forbes.~~
>
> **Chapter 8 – Water, Hydrology (Flood Risk Assessment) and Hydrogeology** details construction phase mitigation measures including surface water management, fine sediment pollution control and measures to prevent accidental spills and leaks. A number of measures are also detailed to protect the groundwater environment. These include management of refuelling, site activities, groundwater monitoring and drainage measures to facilitate groundwater dewatering.
>
> With mitigation in place, Chapter 8 –Water, Hydrology (Flood Risk Assessment) and Hydrogeology concludes that residual effects on groundwater and source protection zones would be Not Significant in EIA terms.
>
> With the adoption of construction phase mitigation measures, drinking water sources will be protected from spillages and pollution during the construction phase. Any associated residual effects on human health are considered **Not Significant** in EIA terms.'

With mitigation in place, **Chapter 8 – Water, Hydrology (Flood Risk Assessment) and Hydrogeology** concludes that residual effects on groundwater and source protection zones would be **Not Significant** in EIA terms.

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Mitigation measures to be deployed pertinent to surface water management have been derived from **EIAR**, **Volume 2**, **Chapter 8 Water, Hydrology (Flood Risk Assessment)**, **Section 8.9.2**, and are as follows:

- Track edge drainage swales will be placed on one or both sides of the track hardstanding, with permanent downslope edge drainage omitted where water can shed onto undisturbed vegetated ground;
- All new Access Tracks will be constructed with a fall to aid drainage of surface water; Access Tracks will be graded to ensure that all runoff is channelled towards the dirty water drains;
- Temporary drainage swales and settlement/filtration features will be added downslope if higher silt loading is observed or additional water control near watercourses is needed;
- Drainage swales and track shoulders will be topsoiled and re-vegetated promptly to establish vegetation;
- Outlets from track edge drainage will flow through temporary mini-settlement ponds and/or silt fences to remove silt during construction;
- Under-track culverts will be installed to allow clean surface runoff to the downgradient side, with culverts/pipes regularly dispersing clean runoff onto natural vegetated surfaces;
- In-line erosion and velocity control measures, such as check dams, silt fences, and other control measures, will be implemented;
- Temporary settlement ponds will be placed on the downgradient side of the excavated track section to collect dirty excavation runoff and keep it separate from clean surface water runoff;
- Temporary sumps, settlement ponds, sediment traps, and proprietary settlement systems like Siltbusters will be used to treat dirty construction water runoff before its controlled release onto natural vegetation surfaces;
- Clean Water Cut-off Drains will be installed upgradient of works areas to collect surface runoff and prevent it from reaching excavations and construction areas of the Site, where it could pick up silt and sediment. Dirty Water Cut-off Drains will be installed downgradient of works areas to collect surface flow runoff and to prevent it from entering existing watercourses. These drains will direct runoff from the work area to locations where it can be treated via settlement ponds or other sediment removal measures;

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- Buffered Outfalls will be constructed at the end of Cut-off Drains, Silt Ponds and other control measures to convert concentrated flows into diffused sheet flow on areas of vegetated ground. Level Spreaders will be used at permanent surface water drainage outfall points to convert concentrated flows into diffuse sheet flow over vegetated ground. This will ensure clean drainage water is distributed without re-concentrating into flow channels immediately below the discharge point;
- Cut-off drains will be installed around working areas to intercept uncontaminated surface runoff and divert it away from construction or excavation sites. Surface water runoff may also be diverted around the excavation using heavy timbers or similar materials laid on the ground;
- Stockpiling of materials will be minimised, and essential stockpiles will be located as far from watercourses as possible;
- The base of the excavation will be at the constructed level, with water gathered in a sump and pumped at a low flow rate into either the mini-settlement pond or track swale;
- If pumping to a SuDS feature is not feasible or the flow rate is too high, flows will be collected and pumped to the downhill side of the excavation over flat vegetated land, well away from watercourses;
- If the downhill slope is steep, a shallow trench will be dug parallel to contour lines to ensure water filters into the soil layers. This trench will be backfilled with excavated material after the Turbine base is completed; and
- Foundation working areas will be re-vegetated as soon as possible after construction.

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Visual Impact

16. RFI Item 16

Whilst the content of EIAR Section 11 and associated appendices and visual impact assessments are noted, it is considered that there is potential for significant landscape effects arising from the associated removal of between 9.32Ha and 9.72Ha of existing forestry, and 0.4Ha of woodland in combination with the proposed wind turbines, and further examination of the visual impact of the proposed forestry and woodland removal associated with the proposed development in combination with the proposed wind turbines, from various sensitive visual receptors within the zone of visual influence of the proposed development is required. In addition, and further to the depictions of the visual impact of the proposed development from northerly aspects including VP6 close to Kilglass Lough, please provide at least one additional image of an arc of landscape which includes the wind farm site in a southern orientation, taken from an observation point at eye level immediately adjacent to the northern lake shore of Kilglass Lough (representing views of the proposed development in its altered landscape context from the opposite side of the lake and its context in the backdrop to this lacustrine landscape) and update relevant landscape and visual assessments accordingly.

16.1.1 Response to RFI Item 16

The first part of this RFI relates to the removal of areas of existing forestry (between 9.32ha and 9.72ha) and woodland (0.4ha). In this regard, it should be noted that a degree of vegetation removal is commonplace for wind farm developments of this scale and nature throughout Ireland. As outlined in **EIAR**, **Volume 2**, **Chapter 2 – Project Description**, and **Chapter 6 – Biodiversity**, conifer plantations are one of the dominant habitats within the proposed wind farm Site which makes up approximately 33.15ha. Indeed, wind farm developments throughout Ireland are commonly sited within large-scale forestry plantations, as these land uses can often readily accommodate wind energy development due to their broad spatial scale and the robust working landscape character typically associated with commercial forestry landscapes.

The majority of vegetation removal in this instance will be carried out in a “Keyhole” manner to facilitate the proposed Project and to create Bat Buffers as outlined in **EIAR**, **Volume 3**, **Appendix - 6.10 Species and Habitat Management Plan**. Conifer forestry plantations are typically harvested on rotation as part of commercial forestry operations and in this context, the removal

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of areas of vegetation within conifer plantations is not uncommon and would not appear incongruous within the prevailing landscape character.

Furthermore, the percentage of habitat loss within the Site which makes up approximately 28.11% (conifer plantations) and 26.35% (Oak-ash-hazel woodland) are generally contained within or surrounded by other extensive areas of dense forestry (**EIAR**, **Volume 2**, **Chapter 6 – Biodiversity**, **Table 6-19**). Therefore, while the removal of this vegetation will give rise to some localised physical landscape effects, these are unlikely to materially influence the character of the local and wider surrounding landscape. In many instances, these areas will be either fully or partially screened from nearby receptors by the surrounding forestry cover, intervening vegetation and the proposed habitat enhancement measures such as hedgerow and treeline planting as outlined in **EIAR**, **Volume 3**, **Appendix 6.10 – Species and Habitat Management Plan (SHMP)**. Indeed, as indicated by the nearest representative viewpoints (Viewpoints VP13, VP15 and VP17) to the proposed areas of vegetation removal (i.e. predominantly in the vicinity of turbine T03), the potential visibility of this vegetation is heavily, and in many cases entirely, screened by surrounding layers of dense intervening vegetation. As a result, the perceived degree of visual change associated with the removal of vegetation is likely to be minimal and, in many instances, indiscernible. Where localised areas of forestry or woodland removal may be visible within the immediate surrounding context, these are likely to be perceived as typical forestry operations or as works associated with the development, which further reduces the potential for notable landscape or visual effects. Overall, while the removal of forestry and woodland to facilitate the proposed Project will result in some landscape effects, these are considered to be of a lower order of magnitude and would not appear incongruous within the prevailing local landscape context, which is influenced by robust working land uses such as existing conifer forestry and the mineral extraction industry.

EIAR, **Volume 2**, **Chapter 11 – Landscape and Visual Impact Assessment** presents an assessment that accounted for the forestry and woodland removal, combined with the addition of the proposed turbines. The assessment concluded that the landscape effects associated with the removal of forestry and minor areas of woodland during the construction phase were **Not Significant** in EIA terms. Additionally, it is assessed that the localised areas of vegetation removal, combined with the addition of the proposed turbines, will result in landscape and visual operational phase effects that are deemed **Not Significant** in EIA terms. The assessment is considered robust and appropriate. No further assessment is needed.

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The second part of this further information response relates to the preparation of additional representative viewpoints for assessment to the northern lake shore of Kilglass Lough. In this regard, two additional photomontages were prepared to represent receptors in this part of the study area. These representative viewpoints are presented in **RFI Appendix 16.1 – Additional Photomontages** and visual effects associated with these are assessed in the section below. It should be noted that, in the opinion of the LVIA consultant, the submitted assessment represents a full and comprehensive assessment of surrounding visual receptors, with representative views from Kilglass Lough and its surrounding lands already included as representative viewpoints within the submitted LVIA (refer to representative viewpoints VP6 and VP7 in the original submission). In this regard, the addition of the two RFI viewpoints has been undertaken in response to the RFI and does not alter the findings of the submitted LVIA.

RFI Viewpoint RFI VP1 – Local road at Muckanagh north of Kilglass Lough

Visual Receptor Sensitivity: Medium

Visual Impact Assessment: This view is afforded from a local road immediately adjacent to the shoreline of Kilglass Lough in the townland of Muckanagh. The view extends across Kilglass Lough and is contained in the distance by low rolling terrain characterised by pastoral farmland and intervening vegetation.

The proposed turbines will be visible to varying degrees along the distant skyline. The blades and nacelles of four turbines will be visible, while partial blade sets of two additional turbines will also be visible rotating along the skyline. At a viewing distance of over 4km, the proposed turbines will appear as discernible built elements along the skyline, although they will not present a prominent visual presence. Indeed, the turbines will present with a low degree of visual contrast here, where in terms of potential cumulative visual effects, the proposed turbines have the potential to be viewed here in combination with the existing Sliabh Bawn turbines located further to the south. Nonetheless, due to the viewing distances involved and the degree of intervening screening, the existing turbines will be difficult to discern from this location. Even if both developments are visible in combination, the proposed turbines will appear as a distinctly separate development, with limited potential for notable adverse cumulative visual effects arising between the two wind farm developments.

Overall, the magnitude of visual effect is assessed as **Medium-low**.

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Significance of Visual Effect: Moderate-slight / Adverse / Long-term – **Not Significant** in EIA Terms.

RFI Viewpoint RFI VP2 – Kilglass Graveyard northeast of Kilglass Lough

Visual Receptor Sensitivity: Medium

Visual Impact Assessment: This view is afforded from a local graveyard located on the north-eastern shores of Kilglass Lough. The depicted view is oriented to the south and is heavily filtered by surrounding, layered winter vegetation. The view is contained shortly beyond the foreground by gently rolling pastoral farmland in the mid-distance. It should be noted that the principal aspects of visual amenity at this location relates to views-oriented westwards across Kilglass Lough.

Partial visibility of the blade sets of up to three of the proposed turbines is afforded from this location. However, surrounding layers of winter vegetation within the foreground and mid-distance will notably filter views of the rotating turbine components. During the summer months, when vegetation is in leaf, visibility of the turbines is likely to be further reduced.

Where visible, the rotating turbine components will appear along the vegetated skyline and will result in only a limited degree of visual change. While their partial visibility may introduce some minor visual ambiguity in relation to their exact location within the wider landscape, they are viewed well offset from the principal aspect of visual amenity at this location, which is oriented westwards across Kilglass Lough. With regard to potential cumulative visual effects, the existing Sliabh Bawn turbines have the potential to be viewed in combination with the proposed turbines, appearing further in the distance to the south, downslope along the vegetated ridgeline. Whilst visible in the wireline view, the existing turbines are difficult to discern from this location and are likely to be clearly perceptible only in very clear viewing conditions. When visible in combination, the proposed and existing turbines will result in a slight increase in the overall intensity of wind farm development. Overall, due to the limited degree of visual exposure of the turbine components, the magnitude of visual effect is assessed as **Low**.

Overall, the magnitude of visual effect is assessed as **Low**.

Significance of Visual Effect: Slight / Adverse / Long-term – **Not Significant** in EIA Terms.

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Summary

Overall, while the proposed wind farm development will result in some minor detraction in visual amenity experienced along the northern shores of Kilglass Lough, this effect is notably reduced due to the viewing distance from the proposed turbines. The turbines will appear well offset from this location and will typically be viewed beyond the sloping ridge located to the east of Kilglass Lough. The proposed turbines will therefore be perceived primarily as background elements within the wider landscape and do not present in a prominent manner from this context. In terms of their scale and function, the turbines do not appear incongruous, especially within the context of the surrounding rolling rural landscape in which they are viewed. As a result, the findings of the submitted LVIA remain unchanged, with landscape and visual effects arising from the proposed project assessed as **Not Significant** in EIA terms.

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Artificial Lighting Impact

17. RFI Item 17

It is noted that it is indicated in Table 5 of the Natura Impact Statement that facility lighting is proposed during the construction and decommissioning phases of the proposed development, that plans and particulars depict operational stage lighting at the proposed substation compound, and that aeronautical safety lighting would be a requirement for the operational phase. In this context, and further to ecological assessments received, assessment of the potential for all proposed artificial light sources at night to have effects on biodiversity, including the potential of same to interrupt the natural biological clock for many animal and plant species as well as existing dark ecological networks from light pollution with many wildlife species active at dawn and dusk or nocturnal, thus relying on dark ecological corridors. Where following such assessment, likely significant effects are identified on sensitive receptors, appropriate mitigation measures should be proposed. The applicant is advised that non-essential lighting of the development and, in particular within the rural environment in an area previously unlit, should be avoided. Mitigation measures are required to take account of, inter alia, EUROBATS 8 'Guidelines for consideration of bats in lighting projects' (2018) and 'Dark Sky Ireland Guidelines - Our vision and policy on reducing light pollution in Ireland' (2019).

17.1.1 Response to RFI Item 17

All proposed artificial light sources were considered as part of the **EIAR** and **NIS**, regard was had to relevant guidance and the likelihood of significant effects was assessed and mitigation measures proposed where necessary. The assessments weighed all relevant guidance pertinent to lighting design in order to avoid impacts to sensitive receptors.

Light pollution is addressed in **Section 9.1.1** in **Volume 6, NIS:**

> *'Lights are to be used with the following guidance from Dark Sky Ireland during the every light needs to be justifiable, limit the use of light to when it is needed, direct the light to where it is needed, reduce the light intensity to the minimum needed, use light spectra adapted to the environment, when using white light, use sources with a "warm" colour temperature (less than 3000K)'*

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All construction, operational and decommissioning lighting necessary for construction or decommissioning works and maintenance works during operational phase will be in the Amber or Red colour spectrum (less than 3000K). All non-essential lighting will be set to motion sensor activation to reduce light emissions during the night. Where works require blue or white light, due to health and safety (H&S) needs, these will be utilised sporadically and invariably during the operational phase and pose negligible magnitude and temporary impacts on sensitive species to light disturbance affecting behaviour such as foraging and roosting. These measures are in line with the following guidance's: BCT 2023, EUROBATS 8 'Guidelines for consideration of bats in lighting projects' (2018) and 'Dark Sky Ireland Guidelines - Our vision and policy on reducing light pollution in Ireland' (2019).

Furthermore, lighting was considered in the **EIAR**, **Volume 2**, **Chapter 6 – Biodiversity, Section 6.7.3**. A number of mitigation measures in relation to lighting were detailed as follows:

> Directional lighting will be used to prevent overspill on to woodland/forestry edges. Exterior lighting, during construction (and post construction), shall be designed to minimize light spillage, reducing the effect on areas outside the Project. Lighting will be directed away from mature trees/treelines around the periphery of the Site boundary to minimize disturbance to bats. Directional accessories can be used to direct light away from these features, e.g. through the use of light shields (Stone, 2013). The luminaries will be of the type that prevent upward spillage of light and minimize horizontal spillage away from the intended lands; Lights are to be used with the following guidance from Dark Sky Ireland during the construction and operation phases of the Project; every light needs to be justifiable, limit the use of light to when it is needed, direct the light to where it is needed, reduce the light intensity to the minimum needed, use light spectra adapted to the environment, when using white light, use sources with a "warm" colour temperature (less than 3000K); and with regard to the potential for lighting to increase collision risk, it is noted that there will be some illumination of the turbines in the form of aviation lighting. Barriers to ensure the lights are only visible from above, not from ground level, will offset the likelihood for lighting to increase collision risk. Whilst this lighting is unlikely to result in any significant increase in collision risk, a comprehensive and site-specific mitigation and monitoring programme, described in Section 6.12, is proposed in line with NatureScot guidance on bat mitigation and post-construction monitoring. The results of post

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construction monitoring shall be utilised to assess changes in bat activity patterns post construction and to monitor the implementation of the mitigation strategy.

As set out in the submitted **EIAR** and **NIS**, the proposed lighting poses no likely significant effects on the environment or SCI's of Natura 2000 sites in consideration of the appropriate mitigation measures as set out, including lighting design choices.

18. RFI Item 18

In addition, and in order to inform the assessment of the potential for facility lighting during the construction, operational and decommissioning phases to lead to disturbance/displacement effects or to otherwise impact on proximate sensitive receptors by reason of undue potential for glare, please provide details of the location, design and illumination characteristics of all such facility lighting including potential for light spillage during the construction, operational or decommissioning phases. Please also clarify if any facility lighting other than required aeronautical warning lighting and substation compound lighting (3.8m high CCTV support structure and lighting post) depicted in Drawing No. 540 and 520 is required/proposed during the operational phase of the proposed development, with specifications and location in plan identified and assessment of impacts on sensitive receptors where applicable.

18.1.1 Response to Further Information Item 18

As outlined in the response to **RFI Item 17**, all proposed artificial light sources for the construction, operational and decommissioning phases were considered as part of the **EIAR** and **NIS**, regard was had to relevant guidance, and the likelihood of significant effects was assessed and mitigation measures proposed where necessary.

As outlined in **EIAR**, **Volume 3**, **Appendix 2.1 – CEMP**, **Section 6.2**, during the construction phase, security measures will be in place at all times when construction activities are not taking place to safeguard site materials and equipment. This will include fencing, locked off areas, surveillance systems and security lighting, as displayed on **Planning Drawing 23640-540**, provided with the original planning documentation.

During the operational phase the only lighting required will be aviation lighting and the lighting for the substation site. Details on the substation lighting for the operational phase are provided **Planning Drawings 23640-540**, **23640-520** and **23640-521**, provided with the original planning documentation.

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The proposed Project will be unmanned during the operational phase. Lighting will be used on an ad hoc basis during this phase for maintenance and security requirements and as such there is no requirement for permanently-on exterior lighting. Exterior lighting will be motion-sensitive for security purposes. There will be no lights in the hours of darkness unless maintenance is being carried out or security has been contacted to the site. As outlined in **EIAR Volume 2, Chapter 2 – Project Description**, it is anticipated that maintenance will take place 24 times per year, i.e., twice per month. Unscheduled maintenance visits will also be required sporadically. Scheduled visits generally take place between 09:00 to 17:00.

EIAR Volume 2, Chapter 14 – Material Assets, Section 14.6.3, outlines the Irish Aviation Authority requirements that all structures exceeding 100 metres in height be fitted with aviation obstacle lighting to ensure visibility to air traffic. The three proposed technology options will have a total tip height of either 156m, 159m or 160m and therefore will require aviation warning lighting, subject to planning approval. Details of the proposed aviation lighting are set out in the original planning documentation in **Planning Drawings 23640-501**, **23640-502** and **23640-503**.

For decommissioning, it is expected that the lighting details will be similar to those proposed for the construction phase (see **Planning Drawing 23640-540**, provided with the original planning documentation).

These light sources associated with the proposed Project were considered as part of the EIAR and NIS during all phases, though were considered to be **Not Significant** owing to their limited extent, location in context of sensitive receptors, and intermittent nature.

The lighting manufacturer for the proposed Project has not been confirmed at this stage. However, as discussed in **RFI Item 17**, mitigation measures discussed in the EIAR and NIS will be implemented during the construction, operation and decommissioning phases of the proposed development. Mitigation measures outlined in **EIAR**, **Volume 2**, **Chapter 6**, (**Section 6.7.3**) in relation to lighting are as follows:

- Directional lighting will be used to prevent overspill on to woodland/forestry edges. Exterior lighting, during construction (and post construction), shall be designed to minimize light spillage, reducing the effect on areas outside the Project. Lighting will be directed away from mature trees/treelines around the periphery of the Site boundary to minimize disturbance to bats. Directional accessories can be used to direct light away from these features, e.g. through the use of light shields (Stone, 2013). The luminaries will be of the

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type that prevent upward spillage of light and minimize horizontal spillage away from the intended lands;

- With regard to the potential for lighting to increase collision risk, it is noted that there will be some illumination of the turbines in the form of aviation lighting. Barriers to ensure the lights are only visible from above, not from ground level, will offset the likelihood for lighting to increase collision risk (**EIAR, Volume 2**, **Chapter 14 – Material Assets**). Whilst this lighting is unlikely to result in any significant increase in collision risk, a comprehensive and site-specific mitigation and monitoring programme is proposed for in line with NatureScot guidance on bat mitigation and post-construction monitoring, as described in **Section 6.12** of **EIAR**, **Volume 2**, **Chapter 6 - Biodiversity**.

On this basis, no further assessment is required.

19. RFI Item 19

Whilst it is noted that potential effects including disturbance and or displacement of species (Greenland White-fronted Goose, ex situ) have been screened-in as part of the overall impact assessment in relation to Ballykenny-Fisherstown Bog SPA, the NIS is required to be updated to reflect consideration of any details provided in accordance with the above concerning the potential for any artificial lighting during the construction, operational or decommissioning phases to impact SCIs of Ballykenny-Fisherstown Bog SPA (ex-situ or otherwise), not previously considered.

19.1.1 Response to RFI Item 19

Greenland White-fronted Goose, was not recorded during any survey efforts for the proposed Project. Furthermore, as discussed in **Volume 6**, **NIS**, the geese appear to have abandoned the site with the last record of Greenland White-fronted Goose at this site in 1990/1991.

Volume 6, **NIS**, **Table 6**, using Source-Pathway-Receptor methodology, established links between the sources of effects arising from the proposed Project and any relevant European Sites. Greenland-White-fronted goose, a Qi/SCI of Ballykenny-Fisherstown Bog SPA, was brought forward for a Stage 2 AA, for disturbance/displacement effects (including lighting), during the construction, operational and decommissioning phases, on a purely precautionary basis.

Volume 6, **NIS**, **Table 15**, provides an assessment of likely significant effects for the relevant Qis/SCIs including for Greenland White-fronted Goose, as well as the source and potential

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pathways for effects to occur. **Section 7.4.1** of the **NIS** concludes that for Ballykenny-Fisherstown SPA (ex-situ SCI – Greenland White-fronted Goose) – there is no potential for adverse effects on the integrity of the SPA from construction, operational or decommissioning phase disturbance (including lighting). Mitigation was not required. On this basis, no further assessment is required.

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Noise

20. RFI Item 20

It is noted that EIAR Section 10.6 reports under Assessment of Effects related to grid connection route works that maximum calculated construction levels of 70 dB $L_{Aeq.}$ at 20 metres has been predicted, which exceeds the limit of 65dB $L_{Aeq,1h}$. It is further indicated that the significance of effects will vary, depending on distance from the works, with effects rated as being 'adverse imperceptible and 'not significant ' in EIA terms at distances greater than 40 metres and 'slight and not significant' in EIA terms for receptors closer to the active construction area for reasons which relate, inter alia, to the temporary nature of adverse effects. Whilst it is noted that any predicted effects at individual properties associated with grid connection works have been reported to be of brief duration, assessment of the nature and significance of such impacts on those individual sensitive receptors which may be exposed to noise levels which exceed prescribed limits is required, with such receptors identified with a projected degree and duration of exceedance assigned and, where appropriate, mitigation measures such as noise suppression measures proposed. The response is required to clarify the number and location of sensitive receptors that will be impacted by the above exceedances, and what alternative designs, alternative works locations, noise controls/abatements or works methods can be considered or implemented to mitigate such noise effects at these locations.

20.1.1 Response to RFI Item 20

As previously outlined in RFI Item 1, Item 5, and Item 9 the Grid Connection Route (GCR) has been designed with due consideration of the Climate Action Plan 2024 and 2025, draft Wind Energy Development Guidelines 2019 and the 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.

It is considered that the proposed Project is in accordance with international, national, regional, and local planning policy, including the Roscommon County Development Plan 2022 – 2028 at a local level and the Renewable Energy Directive III (RED III) (Directive 2023/2413) at a European Level. Furthermore, it is supported by each of the National Climate Policies and Objectives set out in the Climate Acts, it is essential for their achievement, specifically, the Climate Action and Low Carbon Development Act 2015 (as amended ("the Climate Acts")).

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EIAR, **Volume 2**, **Chapter 10 – Noise and Vibration**, has assessed the likely significant effects of the proposed Project (including the GCR) during the construction, operational and decommissioning phases. It is concluded that, with the proposed mitigation measures set out, residual effects are considered to be **Not Significant** in EIA terms.

In response to this request for further information to provide clarification, further detail on the location, duration and impact on sensitive receptors is provided below.

EIAR, **Volume 2**, **Chapter 10 – Noise and Vibration**, **Section 10.6.2 Construction Phase**, outlined that the noise limits during the construction phase may be exceeded at Noise Sensitive Locations (NSLs) within 40m of the Grid Connection Route (GCR) works.

Although all Noise Sensitive Locations along the GCR have been considered in the impact assessment; in order to provide further clarity on the location of the sensitive receptors, RFI **Figure 20-1** and **Table 20-1** have been provided to incorporate Noise Sensitive Locations within 40m of the GCR where exceedances may occur.

The schedule of these NSLs (23no.) has been identified and mapped in **Figure 20-1**.

Furthermore, it is worth noting that NSL 167 is uninhabited and in a dilapidated condition; therefore, it is not considered further in this assessment.

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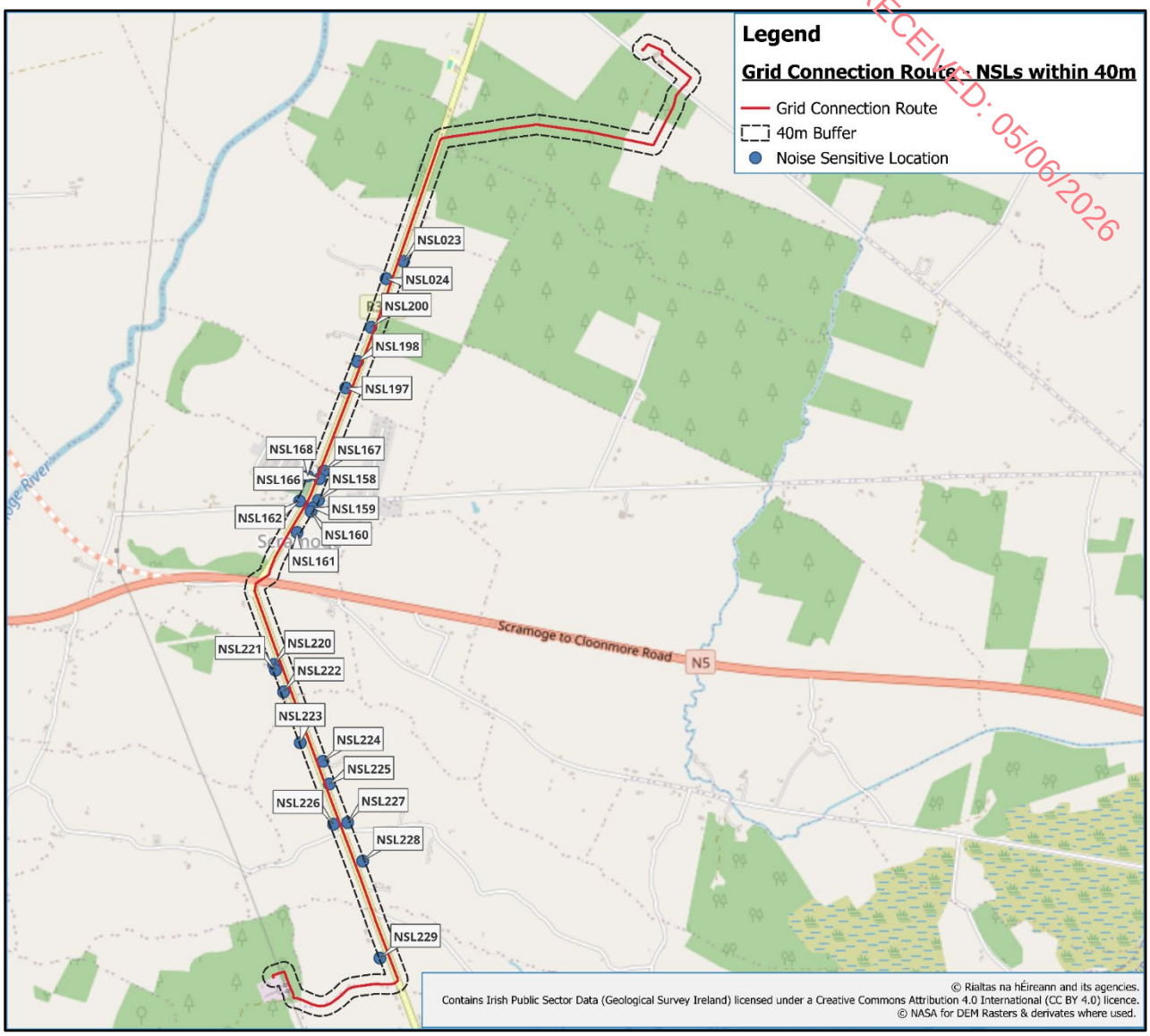


Figure 20-1: NSL's within 40m of the GCR construction works.

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The location, distance, predicted construction noise levels and duration of the works at the NSLs, are provided in **Table 20-1**.

Table 20-1: Summary of Noise Levels to NSLs within 40m of the GCR construction works

Name	Coordinates		Distance to the Works (m)	Predicted Noise Level (L_{Aeq}) dB	Noise Limit (L_{Aeq}) dB and Duration of Works	Duration of Works	Level Difference (L_{Aeq}) dB	Mitigation Required
	ITM(X)	ITM(Y)						
NSL023	597102	780905	20	70	65	<1 Day	5	Yes
NSL024	597031	780834	24	69	65	<1 Day	4	Yes
NSL158	596757	779936	37	65	65	<1 Day	-1	No
NSL159	596732	779904	30	66	65	<1 Day	1	Yes
NSL160	596726	779890	32	66	65	<1 Day	1	Yes
NSL161	596670	779805	28	67	65	<1 Day	2	Yes
NSL162	596680	779932	29	67	65	<1 Day	2	Yes
NSL166	596761	780022	10	76	65	<1 Day	11	Yes
NSL168	596713	780034	39	64	65	<1 Day	-1	No
NSL197	596867	780391	24	69	65	<1 Day	4	Yes
NSL198	596915	780499	18	71	65	<1 Day	6	Yes
NSL200	596969	780637	16	72	65	<1 Day	7	Yes
NSL220	596575	779269	28	67	65	<1 Day	2	Yes
NSL221	596582	779246	30	67	65	<1 Day	2	Yes
NSL222	596615	779158	29	67	65	<1 Day	2	Yes
NSL223	596683	778951	36	65	65	<1 Day	0	No
NSL224	596775	778876	24	69	65	<1 Day	4	Yes
NSL225	596800	778784	16	72	65	<1 Day	7	Yes
NSL226	596818	778621	25	68	65	<1 Day	3	Yes
NSL227	596875	778628	31	66	65	<1 Day	1	Yes
NSL228	596936	778471	33	66	65	<1 Day	1	Yes
NSL229	597006	778078	37	65	65	<1 Day	0	No

Of the 22 NSLs identified within 40m of the GCR, exceedances of the noise limits are predicted at 18 locations. The noise exceedances range from 1dB to 11dB depending on the distance of the receptor to the proposed works location.

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It should be noted that the nature of the GCR construction works are typical of similar utility works and maintenance works on the local, regional and national road networks. As outlined in **EIAR**, **Volume 2**, **Chapter 10 – Noise and Vibration, Section 10.6.2**, approximately 100m of Grid Connection works are expected to be constructed per day.

Specific guidance for such works is provided in the United Kingdom Highways Agency Design Manual for Roads and Bridges (DMRB) LA 111 Noise and Vibration which has been developed from assessment criteria set out in BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Noise. In accordance with this guidance, construction noise impacts shall constitute a significant impact where it is determined that a major or moderate magnitude of impact will occur for a duration exceeding:

- A period of 10 or more days or nights of working in any 15 consecutive days or nights; or
- A total number of days exceeding 40 in any six consecutive months.

Mitigation measures as set out in **EIAR**, **Volume 2**, **Chapter 10 – Noise and Vibration**, **Section 10.7.1** will be undertaken in line with best practice and proven techniques, to comply with the recommendations of BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction on open sites – Noise.

Due to the transient nature of the works, mitigation measures will be further refined between the Appointed Contractor, Local Roads Authority, and local homeowners. Where deemed necessary, additional noise control measures such as temporary acoustic barriers, will be placed between the works and the NSLs to screen noise at the NSLs. BS 5228-1, states that a noise barrier which blocks the line of sight between the source and the receptor would result in an approximate attenuation of 10dB. Therefore, the noise barriers will be designed to block the line of sight between the noise source and the affected NSLs. The location of the acoustic barrier will be set out and agreed with the local planning authority in advance but will of sufficient height and length to ensure that the construction noise criteria is not exceeded.

An image of a typical acoustic barrier is displayed in **Figure 20-2**.

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Figure 20-2 Typical Temporary Acoustic Barrier.

As discussed in **EIAR**, **Volume 2**, **Chapter 10 – Noise and Vibration**, **Section 10.8.1**, the application of binding limits, working hour restrictions and implementation of appropriate noise control measures (further clarified in this response), will ensure that noise effects on the individual sensitive receptors along the Grid Connection route will be adverse and **Not Significant** in EIA Terms. Furthermore, the duration of the works will be **Brief**, and the assessment has considered a worst-case scenario in which all the equipment is operating simultaneously, which is not expected to occur.

21. RFI Item 21

It is noted that EIAR Section 10.6 reports under Assessment of Effects related to horizontal directional drilling works, that the closest NSL to the HDD site is approximately 80m away and that during construction works at this location predict the noise level at the closest NSL is 68dB $L_{Aeq,}$ which exceeds the limit of 65dB $L_{Aeq,1hr.}$ The significance of noise effects in relation to proximity of NSLs to the HDD site has been rated 'adverse, slight and temporary' and 'not significant' in EIA terms. Whilst reference has been made to the duration of the works, it is not clear from this reference the precise duration that affected properties may be exposed to levels which exceed prescribed limits. Please clarify the duration that all affected properties may be so

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affected. The applicant is advised that where any extended duration of exposure of properties to levels exceeding prescribed limits, mitigation measures such as noise suppression measures should be prescribed. The response is also required to clarify the number and location of sensitive receptors that will be impacted by the above exceedances, and what alternative designs, alternative works locations, noise controls/abatements or works methods can be considered or implemented to mitigate such noise effects at these locations.

21.1.1 Response to RFI Item 21

As a worst-case assumption the noise impact of the Horizontal Directional Drilling (HDD) was assessed in **EIAR**, **Volume 2**, **Chapter 10 – Noise and Vibration**, **Section 10.6.2 Construction Phase** at a distance of 80m to the nearest NSL. However, following engagement with the Roscommon National Roads Regional Office (RNRRO) relating to **RFI Item 5**. **Planning Drawings 23604-304** and **23604-562**, have been updated and submitted as part of this response, and are included within **RFI Appendix 1.1 – Planning Drawings**.

Planning Drawing 20604-562 with the revised location of the HDD sites and the nearest NSL indicated is provided for clarification in **Figure 21-1**.

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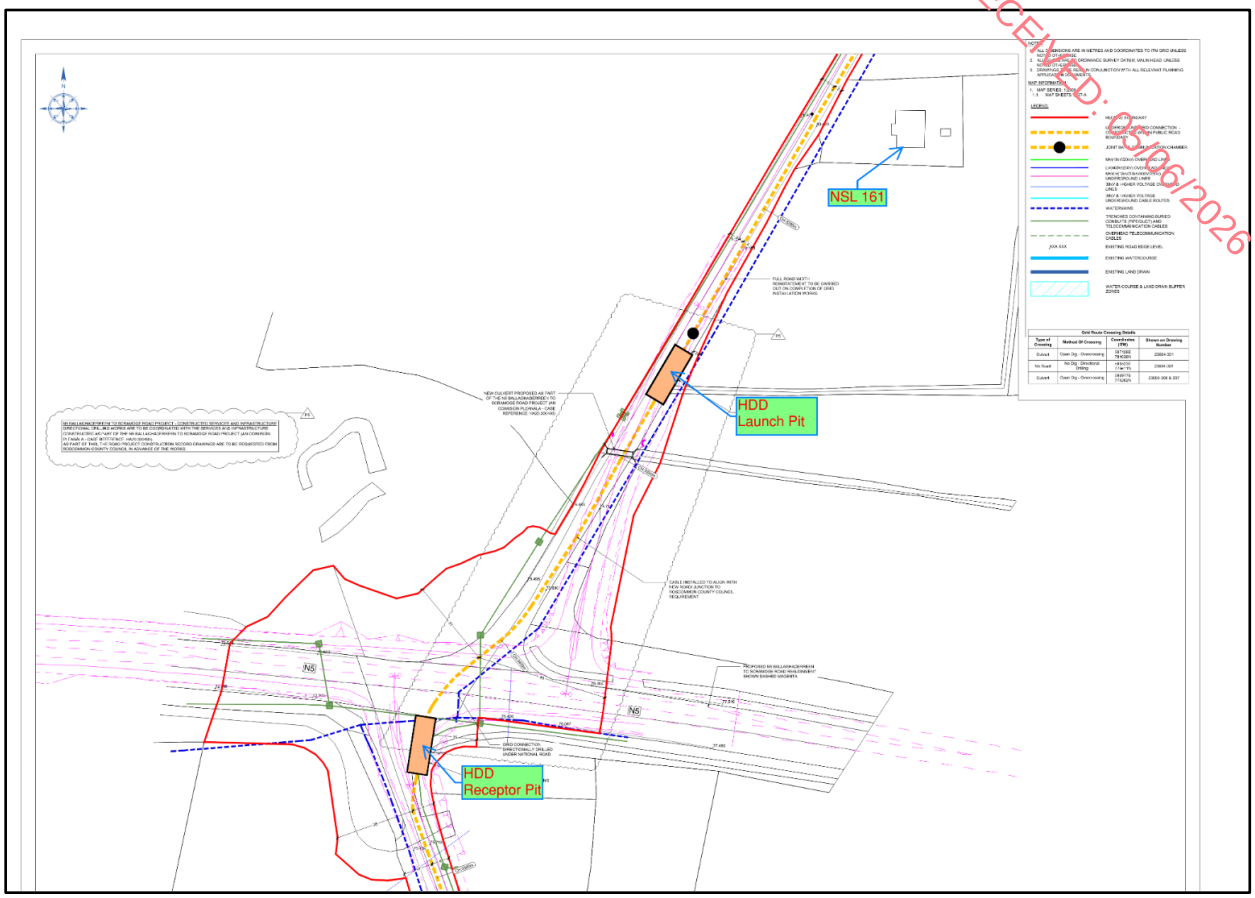


Figure 21-1: HDD Compounds and nearest NSL

The HDD consists of 2no. sites – the Launch pit and the Receptor pit. The Launch pit contains the noise sources as set out in within the EIAR - **Chapter 10**, **Table 10-23**: **Indicative HDD Noise Emission Levels**.

The nearest NSL to the Launch Pit (NSL161) is approximately 120m to the north. Indicative noise sources have been identified and predictions of the potential noise emissions at this distance have been calculated and are provided in **Table 21-1**.

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Table 21-1: Indicative HDD Noise Emission Levels

Item (BS 5228 Ref.)	Plant Noise level at 10m Distance (dBA)	% on-time[1]	Predicted Noise Level at nearest NSL (dBA)
Directional drill (C.2.44)	77	66	54
Mud Pump (D.7.70)	80	66	57
Diesel Pump (C4.88)	68	66	45
Tractor (D.10.220)	86	66	63
Dumper Truck (C.4.4)	76	66	53
Total			64

[1]*Typical/best practice assumption.*

A total construction noise level of 64dB L_{Aeq} has been predicted which is below the limit of 65dB $L_{Aeq,1hr}$. Nevertheless, mitigation measures as set out in **EIAR**, **Volume 2**, **Chapter 10 – Noise and Vibration**, **Section 10.7.1** will be undertaken in line with best practice and proven techniques, to comply with the recommendations of BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction on open sites – Noise. Site hoarding will be installed around the perimeter of both the launch and receiver pits to screen noise at the nearest NSLs. BS 5228-1 states that a noise barrier which blocks the line of sight between the source and the receptor would result in an approximate attenuation of 10dB. Therefore, the noise barriers will be designed to block the line of sight between the noise source and the affected NSLs.

As set out in **EIAR**, **Volume 2**, **Chapter 10 – Noise and Vibration, Section 10.6.2**, the works are expected to be completed within 1.5 weeks and will not operate outside of normal construction hours.

The effect is therefore considered to be **Temporary** and **Not Significant**.

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22. RFI Item 22

Please submit further information to clarify the selection of the noise monitoring locations relative to the locations of the Noise Sensitive Locations identified around the development site.

22.1.1 Response to RFI Item 22

The methodology for the selection of the Noise Monitoring Locations followed applicable guidance and best practice as set out in **EIAR**, **Volume 2**, **Chapter 10 – Noise and Vibration, Section 10.3.6 Approach to Baseline Conditions** of the EIAR.

As set out in **EIAR**, **Volume 2**, **Chapter 10 – Noise and Vibration Section 10.3.5**, the study area for the operational phase is defined in the IOA GPG as:

> *"The study area should cover at least the area predicted to exceed 35dB L_{A90} up to 10m/s wind speed from all existing and proposed turbines."*

An initial noise propagation model of the highest noise emission levels at the rated wind speed of the turbines was used to identify the NSLs within the study area. A total of 219 no. NSLs were identified, and the coordinates are listed in **EIAR**, **Volume 3**, **Appendix 10.3 – Noise Sensitive Locations**.

From a review of these NSLs, a desktop review was undertaken to identify potential noise monitoring locations. Guidance set out in *IOA Good Practice Guide* was followed which states the following.

- **Section 2.2.3**: "In many cases there will be significant variation in general background noise levels within the study area, because of topography and the varying influence of existing noise sources such as roads."
- **Section 2.2.4**: "Background noise measurements should preferably be made in the vicinity of noise-sensitive receptors, principally houses" and; "a 'representative' location within the curtilage of one property [should be] such that the background noise levels measured there can be reliably assigned to all other houses in the group."
- **Section 2.2.5**: "When choosing a location that will serve as a proxy for others, the basis for selection is that it can reasonably be claimed, from inspection and observation, to be representative of the non-surveyed location"

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- **Section 2.2.6:** "The background noise monitoring locations within the study area should be selected on the basis of professional judgment, with the objective of collecting sufficient data to enable the background noise levels at each noise-sensitive receptor within the study area to be characterised."

In advance of the deployment of the noise monitoring equipment, a site visit was undertaken to identify the primary noise sources contributing to the noise environment.

Representative baseline noise monitoring locations have been selected in accordance with the Irish *Wind Energy Development Guidelines (WEDG)*, *ETSU-R-97* and *IOA Supplementary Guidance Note No.1 Data Collection* to characterise the prevailing acoustic environment at noise sensitive receptors (NSLs).

Monitoring locations were chosen to reflect the acoustic conditions at the nearest and most exposed dwellings, as well as locations considered likely to exhibit lowest and highest background noise levels, taking account of factors such as proximity to existing noise sources, local topography, and land use.

Where groups of properties are subject to similar ambient acoustic conditions, a single representative monitoring location has been used.

The derivation of operational noise criteria for the proposed development adopted a conservative approach by using the minimum measured background noise level at each wind speed across all monitoring locations.

By selecting the lowest values recorded for each wind speed, the assessment effectively assumes a worst-case baseline, ensuring that operational limits are not overstated at locations where ambient noise is typically higher due to localised sources (e.g. roads, vegetation, or agricultural activity). This results in a single, precautionary noise envelope that can be applied across all NSLs, providing confidence that compliance with derived limits will protect residential amenity under the most sensitive conditions likely to occur within the study area, consistent with ETSU and IOA guidance, and the precautionary principles embedded in the WEDG 2006.

Based on the aforementioned guidance and the expert opinion of the author, the 5 no. Noise Monitoring Locations (NMLs) chosen were representative of the noise conditions likely to be experienced at the NSLs across the study area. The primary observed noise sources included

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bird song, livestock noises, local road traffic, and rustling vegetation as set out in **Table 10-9 NMLs coordinates and descriptions** of the EIAR.

Each of the 5 NMLs, were located within the curtilage of NSLs identified.

As set out in **EIAR**, **Volume 2, Chapter 10 – Noise and Vibration**, **Section 10.3.6**, the minimum measured noise levels from the NMLs are used to set the operational criteria. This provides for the most conservative impact assessment possible for all NSLs.

23. RFI Item 23

Please provide analysis of the impact any recent tree felling within the noise impact study area due to storm damage or otherwise may have had on baseline noise survey results at representative NSLs within the study area. Where the potential for significant effects and/or variances from baseline results arising from such activity is identified at any of the NSL's surveyed, please update baseline noise studies and associated assessments of likely significant effects accordingly.

23.1.1 Response to RFI Item 23

The *IOA Good Practice Guide* was followed which states the following in relation to wind-induced noise in trees**:**

- **Section 2.2.3: "**In rural or semirural areas, noise generated by wind in trees is generally a dominant noise source at higher wind speeds and therefore the proximity of the monitoring location to trees…may be significant."

As outlined in the response to **RFI Item 22**, the selection of the NMLs was in accordance with the *IOA Good Practice Guide* and therefore were chosen so that the measurement locations were not influenced by wind-induced noise from the trees. Descriptions of the main sources of noise observed at the NMLs as provided in **Section 10.3.6 Approach to Baseline Conditions**, **Table 10-9 NMLs coordinates and descriptions**, confirms that trees were not identified as a factor.

Additionally, the third-party submissions made to the Planning Authority, regarding potential noise effects, were reviewed and have been considered when preparing this **RFI Item 23**. It was observed that the nature of the rural environment within the study area includes serval groups of trees, some of which are visible from the noise monitoring locations. However, in the expert opinion of the author, the treelines were at a sufficient distance as to not cause any wind-induced

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noise at the measurement location and accordingly are in compliance with the *IOA Good Practice Guide* as set out above.

The felling of trees will therefore have no effect on the baseline noise survey results at the representative NMLs and the results remain accurate and representative.

Furthermore, as also outlined in the response to **RFI Item 16**, wind farm developments throughout Ireland are commonly sited within large-scale forestry plantations. Conifer forestry plantations are typically harvested on rotation as part of commercial forestry operations. The effect of the trees on noise propagation is considered negligible. The Ground effect (G) is the interference of sound reflected by the ground interfering with the sound propagating directly from the wind turbines to the NSLs. The *IOA Good Practice Guide* states that the use of G = 0.5 is an appropriate assumption for the determination of noise emission levels at receptor locations downwind of wind turbines. The Ground factor of 0.5 and other calculation settings used in the noise propagating model are provided in **EIAR, Volume 3**, **Appendix 10.4 – Noise Modelling Calculation Parameters**. No additional assessment is required.

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Hydrology (Flood Risk Assessment) and Hydrogeology

24. RFI Item 24

The baseline ecological assessment of the surface water included some unsuitable macroinvertebrate sampling locations which returned results of "Poor Status", with only one of the waterbodies assessed (a tributary of the Curraghroe Stream) achieving the required "Good Status" under the Water Framework Directive. It is noted that macroinvertebrates are not included for further consideration as a Key Ecological Receptor, and the proposed surface water monitoring regime does not appear to include any additional macroinvertebrates surveys for the assessment of water quality. Please submit further information to clarify the omission of further macroinvertebrates surveys of the waterbodies, as macroinvertebrates are key indicators of water quality changes and are assessed by the EPA in their assessment of water quality trends nationally.

24.1.1 Response to RFI Item 24

As detailed in **EIAR**, **Volume 3**, **Appendix 6.8 – Aquatic Ecology**, all freshwater watercourses which could be affected directly or indirectly by the proposed Project were considered as part of the assessment. The survey sites selected are considered to be representative of the watercourses considered. As part of the EIAR, a series of aquatic surveys, including sweep netting for macroinvertebrate species, was carried out. No rare or protected macro-invertebrate species (according to national red lists) were recorded in the biological water quality samples taken from a total of 12 riverine sites and two lacustrine sites in August 2023. Considering these results, macroinvertebrate species were not identified as a Key Ecological Receptor (KER) in **EIAR**, **Volume 2**, **Chapter 6 – Biodiversity**.

EIAR, **Volume 2**, **Chapter 8 - Water, Hydrology and Hydrogeology** and **Volume 3**, **Appendix 2.1.1 - Surface Water Management Plan (SWMP)**, outlines the proposed surface water monitoring regime to be implemented for the proposed Project. Notwithstanding the author's confidence in the suitability of the survey locations and the survey results, the Applicant is satisfied for additional Biological water quality assessment, using the EPA Q-Value methodology, to be included for all stages: pre-construction, during construction, and post-construction as a condition of planning to assess the effectiveness of mitigation measures for water quality as part of the water quality monitoring regime of the proposed Project.

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25. RFI Item 25

Much of the development site is currently covered by conifer plantation which will be removed to enable construction of the turbines. The locations of Turbines T03 and T04 in particular, are linked to EPA mapped watercourses outside the site boundaries by the extensive existing land drainage network onsite. The site topography also directs the existing surface water drains and preferential flow paths towards these rivers on the site boundaries. Details provided concerning the management of site clearance works including clear-felling activities, and controls for sediments or other pollutants entering surface drains and watercourses at this stage of the proposed development are limited. It should also be noted that the baseline ecological survey identified siltation and hydromorphological modifications as the main pressures on waterbodies in the survey area. Please submit further information to clarify how site clearance and clear felling will be carried out in locations served by existing land drains. This must include specific details of pollution control measures that will be used to prevent discharges of sediment and other pollutants.

25.1.1 Response to RFI Item 25

In response to the Planning Authorities request noted above and with regard to the details provided in **EIAR**, **Volume 2**, **Chapter 2 – Project Description** and **EIAR**, **Volume 3**, **Appendix 2.1 - Construction Environmental Management Plan (CEMP)**, tree felling will be carried out in a 'Keyhole' manner in advance of the main construction works. In advance of tree felling, Tree Felling Licenses will be obtained from the Minister of Agriculture under the Forestry Act 2014 as amended. Tree Felling will be carried out in accordance with the requirements of the Tree Felling License and forestry service guidelines including:

- Forest Protection Guidelines;
- Forestry and Water Quality Guidelines;
- Forest Harvesting and Environmental Guidelines;
- Forestry and Freshwater Pearl Mussel Requirements - Site Assessment and Mitigation Measures;
- Forest Biodiversity Guidelines;
- Forestry and The Landscape Guidelines; and
- Forestry and Archaeology Guidelines.

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The silt control and water quality protection measures that will be implemented are set out in **EIAR, Volume 2, Chapter 8 - Water, Hydrology and Hydrogeology**, **EIAR, Volume 3, Appendix 2.1 - CEMP** and **EIAR, Volume 3, Appendix 2.1.1 – Surface Water Management Plan (SWMP)**.

Additional drawings have been provided to provide further detail on the management of site clearance works including clear-felling activities, and controls for sediments or other pollutants entering surface drains and watercourses; see new **Planning Drawings 23604-600** to **23604-608** which have been provided for clarification together with updated **Planning Drawing 23604-402**.

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Planning Drawings 23604-600 to **23604-608** provide detail on the following:

- The locations of existing land drains across the Site;
- The locations of pollution control measures that will be used to prevent the discharge of sediment and other pollutants from site clearance and clearfelling activities; and
- Specific details of the pollution control measures.

Specific details of the pollution control measures are illustrated on **Planning Drawing 23604-402**; this drawing has been updated to provide further clarification on pollution control measures in relation to Forestry Drain Silt Traps, included within **RFI Appendix 1.1 – Planning Drawings**.

EIAR, **Volume 3**, **Appendix 2.1.1 - SWMP** describes the surface water drainage design and the measures that will be put in place during construction, including during tree felling. These measures include clean and dirty water cut-off drains, silt fencing, buffered outfalls, settlement

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ponds, and other measures, which will ensure that no discharges of sediment or other pollutants enter the existing land drain network. It should be noted the control measures outlined in these drawings remain the same as what was originally submitted in the planning application.

The design and control measures outlined within **EIAR**, **Volume 3**, **Appendix 2.1 - CEMP** and **Appendix 2.1.1 – SWMP**, together with the additional drawings included as part of this response, provide adequate detail regarding the measures that will be implemented to preclude discharge of sediment and other pollutants to the existing drain network and hydrological context of the Site during construction works.

26. RFI Item 26

It is noted from the submitted documents that site works to enable the proposed development will include the diversion of existing drains, creation of spoil repositories and the construction of stone access roads and large hard standing areas. Silt arising from these activities is proposed to be managed by the installation of segregated clean water and soiled water drains onsite. It is also noted that it is not proposed to discharge any clean or soiled water directly to any surface water drain or watercourse. Silt controls such as silt fencing, silt bags, silt mats and other technologies are listed in the submitted documents, but it is not clear from the drainage layout drawings if/where these will be used. Please submit further information to clarify where additional silt controls will be utilised on the proposed site drainage network. This is of particular importance for the removal of silt generated from the runoff of quarry fines from new access roads.

26.1.1 Response to RFI Item 26

Surface water drainage measures for the proposed Project have been designed to ensure that that surface water runoff from the development matches the existing “Green Field” runoff rate. Details of the surface water drainage measures are outlined in **EIAR**, **Volume 3**, **Appendix 2.1.1 - SWMP**.

EIAR, **Volume 3**, **Appendix 2.1.1 - SWMP**, **Table 5-1** provides detail on the control measures and locations where they will be deployed.

Specific silt control and water quality protection measures including clean and dirty water cut-off drains, silt fences, buffered outfalls, and settlement ponds for the construction phase are shown on **Planning Drawings 23604-200** to **208**, submitted as part of the planning documentation.

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These drawings are supported by drainage detail displayed on **Planning Drawings 23604-402** and **406**, which have been updated to provide further detail on drainage and are included within **RFI Appendix 1.1 – Planning Drawings**.

Additional measures such as silt busters, silt bags, sedimats or check dams will be available and used as needed, for example, to facilitate any pumping from excavations following a period of rainfall. Works during heavy rainfall will be avoided as far as practicable. A typical example of where additional control measures may be required is during dewatering of excavations, such as turbine foundations. As outlined in **EIAR**, **Volume 3**, **Appendix 2.1.1 - SWMP**, where dewatering of excavations is required, water will be pumped to the head of a Control Measure in order to be treated prior to discharge via Buffered Outfall. To support this RFI response **RFI Appendix 1.1 – Planning Drawings**, **Planning Drawing 23604-406**, has been prepared to illustrate how additional control measures such as silt busters, silt bags, sedimat, check dams typically could be used when pumping water from excavations. The base of the excavation would be constructed level and water will be gathered in a temporary sump and pumped at a low flow rate into a Control Measure such as a temporary settlement pond or a proprietary settlement system such as a siltbuster, the outlet hose pipe will be directed to a collector pond, water will then be passed through a silt bag to trap any of the finer silt and sediment. Sedimats will be placed at the outlet of the silt bag to provide further treatment of the water outfall from the silt bag. The outfall from the sedimat will be controlled via a check dam, to control the velocity of the water before connecting with the dirty water drains and finally connecting to the settlement ponds and buffered outfall.

As outlined in **EIAR**, **Volume 3**, **Appendix 2.1 – CEMP** it will be the responsibility of the Construction Manager, Environmental Clerk of Works, and Project Hydrologist to ensure that the mitigation measures proposed are implemented during the construction phase. The control measures outlined in **EIAR**, **Volume 2**, **Chapter 8 – Water, Hydrology and Hydrogeology**, **EIAR**, **Volume 3**, **Appendix 2.1 – CEMP** and **EIAR**, **Volume 3, Appendix 2.1.1 – SWMP** shall be implemented to ensure the proposed works do not have a significant effect on the environment.

27. RFI Item 27

The GSI data indicates that the site is underlain by a Poor Aquifer (Pl) and poorly draining soils, however, the site is dominated by high and extreme groundwater vulnerability due to shallow soil cover and exposed bedrock at the existing ground surface. These make the underlying

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groundwater resource susceptible to pollution. Please submit further information to clarify the specification and locations of the clean water and soiled water drains onsite, to ensure that water containing silt or other contaminants cannot enter the underlying groundwater aquifers.

27.1.1 Response to RFI Item 27

As part of **EIAR**, **Volume 2**, **Chapter 8 – Water, Hydrology and Hydrogeology** an assessment of likely significant direct and indirect effects has been undertaken including the assessment of the groundwater (hydrogeology) environment from the proposed Project. **EIAR**, **Volume 2**, **Chapter 8 – Water, Hydrology, and Hydrogeology, Section 8.9.2** outlines the mitigation measures that shall be implemented during the construction, operation and decommissioning phases, included as follows:

- Designate specific areas for refuelling and maintenance in a controlled manned, located on impervious surfaces/bunded trays to prevent spills from seeping into the ground;
- Avoid use of herbicides for vegetation control around Turbines and Site Access Tracks. Where herbicides are necessary, use environmentally friendly alternatives and apply them following strict guidelines to prevent infiltration into groundwater;
- Conduct baseline groundwater quality testing before the wind farm becomes operational to establish existing conditions; and
- Implement a regular groundwater monitoring program to detect any potential contamination early and take immediate corrective action.

The mitigation measures proposed have been developed with the source-pathway-receptor methodology in mind and are designed by either removing the source or disrupting the pathway for pollution. **Chapter 8** is supported by **EIAR**, **Volume 3**, **Appendix 2.1 – CEMP**, whereby specific mitigation measures for the protection of groundwater are listed in **Section 7.3.5**. The specific locations of silt control measures and water quality protection measures including clean and dirty water cut-off drains, silt fences, buffered outfalls, and settlement ponds for the construction phase are shown in **Planning Drawings 23604-200** to **208** submitted as part of the planning documentation. These drawings outline the mitigation measures that shall be put in place during the construction phase including clean water and dirty water drains. **Planning Drawings 23604-250** to **258** submitted as part of the planning documentation outline the mitigation measures that shall be put in place during the operational phase.

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These drawings are further supported by drainage detail within **Planning Drawings 23604-400** which is included within the original planning documentation.

The Planning Authority should note **Planning Drawing 23604-402** has been updated to provide additional clarification to address RFI Item 25. An additional **Planning Drawing 23604-406** has been provided to provide additional clarification and support to address RFI Item 26 and RFI Item 32. There drawings are enclosed within **RFI Appendix 1.1 – Planning Drawings**.

These measures as shown in the drawings above and described in the CEMP and SWMP were assessed in the **EIAR Volume 2**, **Chapter 8 - Water, Hydrology (FRA) and Hydrogeology**. Through the implementation of mitigation measures proposed, residual effects to groundwater bodies is considered to be **Not Significant**, in EIA terms.

28. RFI Item 28

The submitted GSI data indicates the locations of known wells and boreholes, but there is no further information on any potentially unmapped private wells and their locations near the development site. Please submit further information to clarify if the locations of any unmapped private wells were determined as part of their assessments of vulnerable receptors.

28.1.1 Response to RFI Item 28

EIAR, **Volume 2**, **Chapter 8 - Water, Hydrology (FRA) and Hydrogeology** provides, a detailed and robust assessment of likely significant effects on groundwater (hydrology) (including wells and boreholes) during the construction, operational and decommissioning phases. **EIAR**, **Volume 2**, **Chapter 8 - Water, Hydrology (FRA) and Hydrogeology Section 8.4.8**, identifies the nearest mapped groundwater wells, located within or adjacent to the proposed Project. The radii of three groundwater wells are shown overlapping the Redline Boundary nearest turbine T06, however their exact location is not disclosed for privacy reasons. Additionally, the radii of a fourth and fifth groundwater well intersect with the GCR, with location accuracy limited to within 1km for privacy reasons.

As outlined in the chapter during the public consultation and further noted in an analysis of the submissions made to the Planning Authority, concerns were highlighted regarding private wells supplying drinking water to nearby homes and farms.

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While not all wells are mapped in the GSI database or in the EPA's Abstraction Register, a precautionary approach was adopted in the assessment by assuming the presence of an unmapped private well at each residential receptor in the EIA Study Area. All such dwellings are located at a minimum setback distance of 640m from the proposed wind turbines, with the exception of sensitive receptor H35 that is located 599m from the closest wind turbine.

In the absence of any the specific Irish guidance, the Department of Environment/Northern Ireland Environment Agency guidance document: *Wind farms and groundwater impacts - A guide to EIA and Planning consideration* (DoE/NIEA 2015), was considered as best practice during the assessment for the proposed Project. The guidance states;

> *"To reduce the risk of the wind farm development having an impact on the water environment the use of mitigation buffer zones should be considered in the layout design."*

The aforementioned guidance further recommends a mitigation buffer zones to be considered for any potential sensitive water feature used for drinking water (public or private) to be 250m.

Having regard to the mitigation measures outlined in **Section 8.9.2** for groundwater impacts during the construction phase, and with the minimum residential setback from the proposed turbines being 640m (or 599m to receptor 35), these distances are substantially greater than the suggested buffer zones outlined in the guidance. In consideration of this the residual effect to groundwater wells is considered to be **Not Significant** in EIA terms.

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Material Assets

29. RFI Item 29

While potential impacts on the Uisce Éireann Ballyfeeny Reservoir on the site boundary have been considered, there does not appear to be any assessment on the potential impacts on the Evergreen Fields Ballyfeeney Sludge Storage Facility, which is located in the building described as an agricultural shed adjacent to the proposed location of Turbine T01.This site holds an active Certificate of Registration from Roscommon County Council for the storage of biosolids sludge. The applicant is, therefore, required to submit further information to clarify if any potential impacts on this site were determined as part of their assessments.

29.1.1 Response to RFI Item 29

During the iterative design strategy undertaken as part of the EIA process of the proposed Project, the Certificate of Registration (COR-RN-SS-20-0001-02) for the Sludge Storage Facility, was reviewed by the project team. Under the terms of the Certificate of Registration, the storage facility is subject to a number of conditions including the management of activities, site access and infrastructure, waste acceptance and handling, emissions and environmental monitoring, etcetera.

It is considered that there will be no direct impacts between the proposed Project and the Sludge Storage Facility during the construction phase. Construction activities will not encroach on the operational footprint of the Sludge Storage Facility and there will be no interaction with the site entrance, site operations or associated infrastructure. Equally, once the proposed Project is operational, it will not impact on site capacity and operations, infrastructure or environmental management controls at the Sludge Storage Facility.

It should be noted that the existing baseline traffic, including traffic associated with the facility, was accounted for within the assessment. Any indirect interaction with construction traffic on the local road L6018 during the construction phase will be managed through the implementation of the **EIAR**, **Volume 3**, **Appendix 2.1.2 – Construction Traffic Management Plan (CTMP)**, **Section 7**. Once operational, the proposed Project site will be generally unmanned, with operation site visits occurring approximately twice per month as a minimum. Operational phase traffic will therefore have no direct impact on works or access/egress at the Sludge Storage Facility.

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Therefore, no impacts including cumulative impacts with the Sludge Storage Facility were identified, and the facility was not considered further in the EIAR.

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Other Matters

30. RFI Item 30

Section 2.3.3 of the EIAR indicates that the lands on which the proposed project are proposed are either under the ownership of forestry companies or private lands. Whilst the applicant appears to have provided details of sufficiency of interest, it is indicated in Section 2.3.3 of the EIAR that landowners who have provided consent also have additional ownership interest beyond the lands outlined blue but are not optioned as part of this development. In the interests of clarity, and in order that the extent of the subject planning unit to which each third party consent provided relates may be verified and confirmed, the applicant is required to plot the portion of the remaining overall planning unit to which each of the six third party consents relates (noting that one has been provided by the local authority and that a second is accompanied by a map of the lands to which the consent relates) in the context of the planning unit.

30.1.1 Response to RFI Item 30

In response to the Planning Authorities request noted above, a set of revised maps (**RFI Appendix 30.1 – Landowner Folios**) have been prepared to provide additional clarity as requested for the Landowner Letters of Consent included in **Part 1 Planning Pack**, to which;

1. Identify the lands that are subject to an option agreement outlined in Blue in the Planning Drawings as submitted as part of the planning application.
2. For completeness, identity the other lands associated with the folio but are not subject to an option agreement and are not within the Redline Boundary.

It is requested that the additional maps provided in response to this RFI are kept confidential for privacy reasons, as lands in private ownership, beyond the control of the Applicant are also depicted. Names have been redacted where appropriate.

31. RFI Item 31

EIAR Section 2.4.7 indicates that depending upon turbine selection, handstands and ancillary temporary stoned areas may be micro-sited by up to 20m. Please provide further clarity in relation to any stated micrositing together with details in relation to the impact of same on the proposed EIAR and NIS mitigation measures.

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31.1.1 Response to RFI Item 31

As outlined in the **EIAR**, **Volume 2**, **Chapter 2 – Project Description (Section 2.4.7)**, micro-siting may be applied to Turbine Hardstands and ancillary stone areas, contingent on turbine selection.

Whilst flexibility was requested for the Turbine Technology Options, flexibility was not sought regarding the siting of the proposed turbine locations. The turbines will be positioned in accordance with the coordinates outlined in **EIAR**, **Volume 2**, **Chapter 2 – Project Description**.

The hardstanding and stoned areas were considered as part of the EIAR (and the NIS, as relevant). The micro-siting assessments were approached under worst case scenario basis. Any micro-siting will take place within the EIAR/NIS envelope. Therefore, any micro-siting would remain within the proposed development redline boundary already assessed in the submitted EIAR and NIS. The micro-siting requirement did not introduce any new impacts, nor did it change the magnitude of impact or significance of any predicted effects. Therefore, no new or additional mitigation measures were required for micro-siting beyond those already outlined in the **EIAR**, **Volume 2** and **Volume 6**, **NIS** submitted.

The specialists for each of the EIAR topic chapters have provided statements in terms of the Item 31 micro-siting request which set out and clarify the assessment approach that was undertaken. Specialist Micro-siting Statements pertinent to the EIAR and NIS are displayed in **Table 31.1**.

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Table 31.1 Summary of Specialist Micro-siting Responses.

Chapter	Author	Response Statement
Chapter 5 – Population & Human Health	Rowan – Jessica Boyd	The potential for micro-siting of turbine hardstands and associated stoned areas by up to 20m, as outlined in **EIAR, Volume 2, Chapter 2 - Project Description,** has been fully considered within the **Chapter 5 – Population & Human Health**. This limited micro-siting allowance did not give rise to any previously unidentified impacts on human health and did not result in any change to the predicted magnitude or significance of effects as assessed. Accordingly, no additional mitigation measures were required in respect of micro-siting.
Chapter 6 - Biodiversity	Inis – Alex Copland	The EIAR considered the worst-case scenario locations and proximities to KERs. As such, the impacts of any micro-siting as a result of project construction changes have been duly accounted for and considered for all three Technology Options. There are no requirements for any additional mitigation measures beyond those already identified.
Chapter 8 - Water, Hydrology (Flood Risk Assessment) and Hydrogeology	JBA - Conor O'Neill	It is JBA's understanding that micro-siting may apply to the hardstanding and ancillary stoned areas, by up to 20m. The allowance for micro-siting will ensure that the least amount of earthworks and site-stoning required will be carried out. Any micro-siting which is required will maintain the buffers to drains and other features of environmental sensitivity. The turbine hardstand design presented with the application documents was a single design suitable for all three Technology Options, using the largest turbine hardstand and ancillary stoned areas requirements. JBA confirm that the allowance for micro-siting as outlined in **Chapter 2 - Project Description EIAR, Volume 2,** was considered in the preparation of **Chapter 8 - Water, Hydrology (Flood Risk Assessment) and Hydrogeology.** The requirement for micro-siting did not result in any additional **negative effects**, nor did it change the magnitude or significance of any predicted effects within **Chapter 8 - Water, Hydrology (Flood Risk Assessment) and Hydrogeology.** The requirement for micro-siting did not result in any new

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Chapter	Author	Response Statement
		or additional mitigation measures being added to **Chapter 8 - Water, Hydrology (Flood Risk Assessment) and Hydrogeology.**
Chapter 9 – Air Quality & Climate	Rowan – Jessica Boyd	The Air Quality & Climate assessment has taken account of the hardstanding and ancillary stoned areas, including the provision for micro-siting of up to 20m, as stipulated in **Chapter 2 - Project Description** of the EIAR. This limited micro-siting allowance does not give rise to any previously unidentified impacts on air quality and climate. It does not result in any variation to the assessment of effects, and all conclusions of the assessment remain unchanged. No additional mitigation measures were required in respect of micro-siting.
Chapter 10 – Noise and Vibration	Enfonic – Gary Duffy	The potential for micro-siting of turbine hardstands and associated stoned areas by up to 20m, as outlined in **EIAR, Volume 2, Chapter 2 - Project Description.** has been fully considered within the **Chapter 10 – Noise & Vibration**. This limited micro-siting allowance does not give rise to any previously unidentified impacts. It does not result in any change to the predicted magnitude or significance of effects as assessed, and all conclusions of the assessment remain unchanged. No new or additional mitigation measures were required in respect of micro-siting.
Chapter 11 – Landscape and Visual	Macroworks - Cian Doughan	With regard to the potential landscape and visual effects of the hardstanding and stoned areas proposed as part of the proposed Project, including the provision for micro-siting of up to 20m as outlined in **Chapter 2 - Project Description**, these have been considered as part of the EIAR. The potential micro-siting of these components will not give rise to any additional effects beyond those already identified in the submitted assessment. Overall, the scale and extent of these hardstanding and stoned areas will remain consistent across all potential scenarios and, therefore, will not result in any changes to the magnitude or significance of the effects previously identified. Thus, no additional mitigation measures are required in

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Chapter	Author	Response Statement
		respect of potential micro-siting. As a result, the potential micro-siting of the proposed hardstanding and stoned areas is assessed as giving rise to effects that are **Not Significant**.
Chapter 13 – Archaeology, Architectural& Cultural Heritage	Icon - John Kavanagh	The potential for micro-siting of turbine hardstands and associated stoned areas by up to 20m, as outlined in **Chapter 2 - Project Description** of the EIAR, has been fully considered within the **Chapter 13 – Archaeology, Architectural & Cultural Heritage**. This limited micro-siting allowance does not give rise to any previously unidentified impacts on known or potential archaeological heritage assets. It does not result in any change to the predicted magnitude or significance of effects as assessed, and all conclusions of the assessment remain unchanged. No additional mitigation measures were required in respect of micro-siting.
Chapter 14 – Material Assets	Rowan – Jessica Boyd	The Material Assets assessment has fully considered the hardstanding and associated stoned areas, including the allowance for micro-siting of up to 20m, as outlined in **Chapter 2 – Project Description** of the EIAR. This limited micro-siting allowance does not introduce any previously unidentified effects on material assets. It does not change the assessment of effects, and all conclusions of the assessment remain unchanged. Therefore, no additional mitigation measures are required beyond those stipulated in the EIAR.
Chapter 15 – Shadow Flicker	Macroworks – Peter Connell	The potential for micro-siting of turbine hardstands and associated stoned areas by up to 20m, as outlined in **Chapter 2 - Project Description** of the EIAR, was considered within **Chapter 15 – Shadow Flicker**. As micro-siting only applies to the turbine hardstands and associated stoned areas, and not to the turbine locations, there is no potential for shadow flicker impacts arising from any required micro-siting. Accordingly, the findings of the Shadow Flicker assessment remain robust and accurate, with residual effects continuing to be assessed as **Not Significant.** There are no requirements for any additional mitigation measures beyond those already identified.

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Chapter	Author	Response Statement
Volume 6 - NIS	Inis – Alex Copland	The NIS considered the worst-case scenario locations and proximities to KERs. As such, the impacts of any micro-siting as a result of project construction changes have been duly accounted for and considered for all three Technology Options. There are no requirements for any additional mitigation measures beyond those already identified.

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32. RFI Item 32

The applicant has indicated that it may be necessary to pump out groundwater onsite to facilitate the construction of turbine foundations, hardstanding, or other aspects of the proposed development works. The applicant is advised that if dewatering is required, then a discharge license will be required as set out under Section 4 of the Local Government Water Pollution Act 1977 (as amended)

32.1.1 Response to RFI Item 32

The Applicant acknowledges the requirement outlined under Section 4 of the Local Government Water Pollution Act 1977 (as amended) in relation to discharge licensing. However, it is confirmed that a discharge licence will not be required for the proposed Project.

Any groundwater pumped on-site to facilitate construction is expected to be limited in its extent. The dewatered groundwater will be managed onsite through controlled measures and will not be discharged to surface water or ground water bodies.

As detailed in **EIAR**, **Volume 2**, **Chapter 8 – Water, Hydrology (Flood Risk Assessment) and Hydrogeology**, **Section 8.9.2**, temporary settlement ponds will be positioned on the downgradient side of excavated track sections to collect sediment-laden runoff and ensure it remains separate from clean surface water. A range of standard best practice measures will be implemented, including temporary sumps, settlement ponds, sediment traps, and proprietary treatment systems such as Siltbusters, to treat dirty construction water prior to its controlled discharge onto natural vegetated areas.

Specific silt control and water quality protection measures including clean and dirty water cut-off drains, silt fences, buffered outfalls, and settlement ponds for the construction phase are shown on **Planning Drawings 23604-200** to **208**, submitted as part of the planning documentation.

These drawings are supported by drainage detail displayed on **Planning Drawings 23604-402** and **406**, which have been updated to provide further detail on drainage and are included within **RFI Appendix 1.1 – Planning Drawings**.

As there will be no direct discharge to any groundwater or mapped watercourses, the requirement for a discharge licence is therefore, not required.

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33. RFI Item 33

"Please note that the reproduction of information or documentation previously provided should be avoided in compliance with this notice. Where the response necessitates the submission of updated plans, documents, studies or assessments it is requested that, in the interests of clarity, all updates on foot of the response to this notice are highlighted and itemised."

33.1.1 Response to RFI Item 33

Any clarifications to the original planning documentation, including the EIAR and NIS, arising from typographical error in the originally submitted documents, have been addressed within this RFI response Report and are highlighted in **RED** for clarity. Deletions are indicated using **RED** strikethrough.