

Eoin McCarthy

From: Gareth Rennicks <GRennicks@airspeed.ie>
Sent: 25 October 2016 09:40
To: Eoin McCarthy
Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Eoin

Here are the Coordinates for Current Links in the area.

A End	B End
54.7169 -7.94306	54.8749 -7.74331
54.7169 -7.94306	54.9431 -7.53389
54.7169 -7.94306	54.3687 -8.52022
54.7169 -7.94306	54.7 -7.99
54.7169 -7.94306	54.6211 -8.58194
54.7169 -7.94306	54.7315 -8.39131

Regards

Gareth

From: Eoin McCarthy [mailto:emccarthy@mccarthykos.ie]
Sent: 21 October 2016 09:00
To: grennicks@airspeed.ie
Subject: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi John,

You may have been previously contacted in relation to the presence of Airspeed telecom links in southeast Donegal.

We are carrying out an updated constraints study on the same proposed wind farm site south of Ballybofey. The coordinates of the approximate centre of the site is E203,614 N386,420.

Please also see attached a map of the site location.

Could you please advise as to the start and end points of Airspeed links in this area.

Kind Regards,
Eoin

Eoin McCarthy B.Sc. (Env.)
Project Environmental Scientist

McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants

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Lorraine Meehan

From: Roger Woods [mailto:rwoods@bai.ie]
Sent: 05 December 2016 13:38
To: McCarthy Keville O'Sullivan Ltd. <info@mccarthykos.ie>
Cc: Lorraine Meehan <lmeehan@mccarthykos.ie>
Subject: RE: 160502 - Proposed Carrickaduff Wind Energy Development - Scoping Letter

Hi Aoife

The BAI does not perform an in depth analysis of the effect of wind turbines on FM networks. However, we are not aware of any issues from existing windfarms into existing FM networks. Also, the proposed windfarm is not located close to any existing or planned FM transmission sites.

We therefore have no issue with the location of the proposed wind farm.

Regards

Roger

Senior Executive Engineer
Broadcasting Authority of Ireland
2-5 Warrington Place
Dublin D02 XP29

Tel: 01 6441200
Fax: 01 6441299

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Lorraine Meehan

From: Patrick Bolton [<mailto:patrick.bolton@comreg.ie>]

Sent: 20 October 2016 16:58

To: Eoin McCarthy <emccarthy@mccarthykos.ie>

Cc: Tara Kavanagh <tara.kavanagh@comreg.ie>

Subject: RE: Proposed Wind Farm at Lismullyduff and Carrigaduff Hill, Co. Donegal - Transmission Links

Hi Eoin,

Attached is an excel file of the mobile operators with fixed links with 10 Km of the coordinates supplied by

Kind regards,

Patrick Bolton

Radio Spectrum Engineer

Commission for Communications Regulation



Eoin McCarthy

From: Seamus.O'Keeffe@openeir.ie
Sent: 26 October 2016 11:36
To: Eoin McCarthy
Cc: Thomas.SHERIDAN@openeir.ie
Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms
Attachments: Eir Links from Barnesmore Gap_IG.doc; ATT00001.txt

Hi Eoin,
See attached with co-ordinates in Irish Grid.

Regards,
Seamus



Seamus O'Keeffe
Senior TX Design Engineer

T: +353 1 7017379 M: +353 851742138

seamus.okeeffe@openeir.ie 

open eir, Ground Floor, GF-A9, Bianconi Avenue
City West Business Park.

From: Eoin McCarthy [mailto:emccarthy@mccarthykos.ie]
Sent: 26 October 2016 10:15
To: O'Keeffe, Seamus
Cc: Sheridan, Thomas
Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Seamus,

Would you have the co-ordinates in Irish Grid or ITM?

Kind Regards,
Eoin

Eoin McCarthy B.Sc. (Env.)
Project Environmental Scientist

McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants

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From: Seamus.OKeeffe@openeir.ie [<mailto:Seamus.OKeeffe@openeir.ie>]

Sent: 21 October 2016 12:57

To: Eoin McCarthy <emccarthy@mccarthykos.ie>

Cc: Thomas.SHERIDAN@openeir.ie

Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Eoin,

I don't remember previous correspondence regarding this. Perhaps you were dealing with Tom Sheridan so I am copying him on this reply. I wouldn't normally deal with Wind farm queries.

With regard to this location we would have concerns about links we have working from Barnsmore Gap on the western edge of your study area. See attached for details of radio links and the co-ordinates.

Regards,
Seamus



Seamus O'Keeffe
Senior TX Design Engineer

T: +353 1 7017379 M: +353 851742138

seamus.okeeffe@openeir.ie 

open eir, Ground Floor, GF-A9, Bianconi Avenue
City West Business Park.

From: Eoin McCarthy [<mailto:emccarthy@mccarthykos.ie>]

Sent: 21 October 2016 09:04

To: O'Keeffe, Seamus

Subject: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Seamus,

You may have been previously contacted in 2014 in relation to the presence of Eircom telecom links in southeast Donegal.

We are carrying out an updated constraints study on the same proposed wind farm site south of Ballybofey. The co-ordinates of the approximate centre of the site is E203,614 N386,420.

Please also see attached a map of the site location.

Could you please advise as to the start and end points of Eircom links in this area.

Kind Regards,
Eoin

Eoin McCarthy B.Sc. (Env.)
Project Environmental Scientist

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Lorraine Meehan

From: Ronnie O'Neill [mailto:Ronnie.ONeill@imagegroup.ie]

Sent: 09 December 2016 13:30

To: Lorraine Meehan <lmeehan@mccarthykos.ie>

Cc: Ian Watson <Ian.Watson@imagegroup.ie>; Terry LeRougetel <Terry.LeRougetel@imagegroup.ie>

Subject: RE: 160502 - Proposed Carrickaduff Wind Farm, Co Donegal

Hi Lorraine ,

Imagine have no links in the area .

Rgds,
Ronnie .

Eoin McCarthy

From: Brady Sean <sbrady@MayoCoCo.ie>
Sent: 25 October 2016 17:12
To: Eoin McCarthy
Subject: FW: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms
Attachments: 160502 - Site Location V1 - 2016.10.21.pdf

Hi Eoin,

Your email below and phone call this morning refer.

Below are details of our microwave radio links in this area.

Grid Locations are Irish National Grid.

HillTopSite	Easting	Northing	Mast Operator	HillTopSite	Easting	Northing	Mast Operator	Frequency	Capacity
Barnesmore	203710	385490	Cell Com	Mongorry Hill	223520	404900	RTE	1.5GHz	256Kbit
Barnesmore	203710	385490	Cell Com	Holywell Hill	238490	416990	RTE	1.5GHz	512Kbit

Regards, Sean

From: Brady Dermot
Sent: 21 October 2016 11:43
To: Brady Sean
Subject: FW: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

From: Eoin McCarthy [<mailto:emccarthy@mccarthykos.ie>]
Sent: 21 October 2016 09:14
To: Brady Dermot
Subject: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi David,

You may have been previously contacted in 2014 in relation to the presence of Mayo County Council CAMP links telecom links in southeast Donegal.

We are carrying out an updated constraints study on the same proposed wind farm site south of Ballybofey and have been informed by Comreg that Mayo County Council may have links in this area. The co-ordinates of the approximate centre of the site is E203,614 N386,420.

Please also see attached a map of the site location.

Could you please advise as to the start and end points of CAMP links in this area.

Kind Regards,
Eoin

Eoin McCarthy B.Sc. (Env.)
Project Environmental Scientist

McCarthy Keville O'Sullivan Ltd.
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Eoin McCarthy

From: Gerry Callan <Gerry.Callan@mosaicnet.ie>
Sent: 21 October 2016 14:04
To: Eoin McCarthy
Cc: WindFarmsDG; Alan Hutchinson
Subject: Re: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Eoin,

Many thanks for this.

I've added the planned turbines to our planning tool to ensure we don't plan future links that traverse the development area. Having checked each of the 38 turbine locations, I'm happy to confirm that none of them would have any negative impact on the 3 (incl. O2) transmission network as they're all well outside the link buffer zones.

Good luck with the development,

Best wishes,

Gerry Callan,
3/Mosaic,
3rd Floor, 5 Harbourmaster Place,
IFSC, Dublin 1.
Tel: 086 3884246
Remedy: Tech-Netshare-ANCO-Dimension-Trans_Eng

From: Eoin McCarthy <emccarthy@mccarthykos.ie>
Sent: 21 October 2016 11:54
To: Gerry Callan
Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Gerry,

That centre point co-ordinate that I provided earlier is incorrect.

It should be E212,240 N388,120.

However, based on the start and end points of your link the separation distance between the centre point and the link is approx. 650m

Please also see attached the proposed turbine co-ordinates so that you can carry out a more detailed analysis.

Kind Regards,
Eoin

Eoin McCarthy B.Sc. (Env.)
Project Environmental Scientist

McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants

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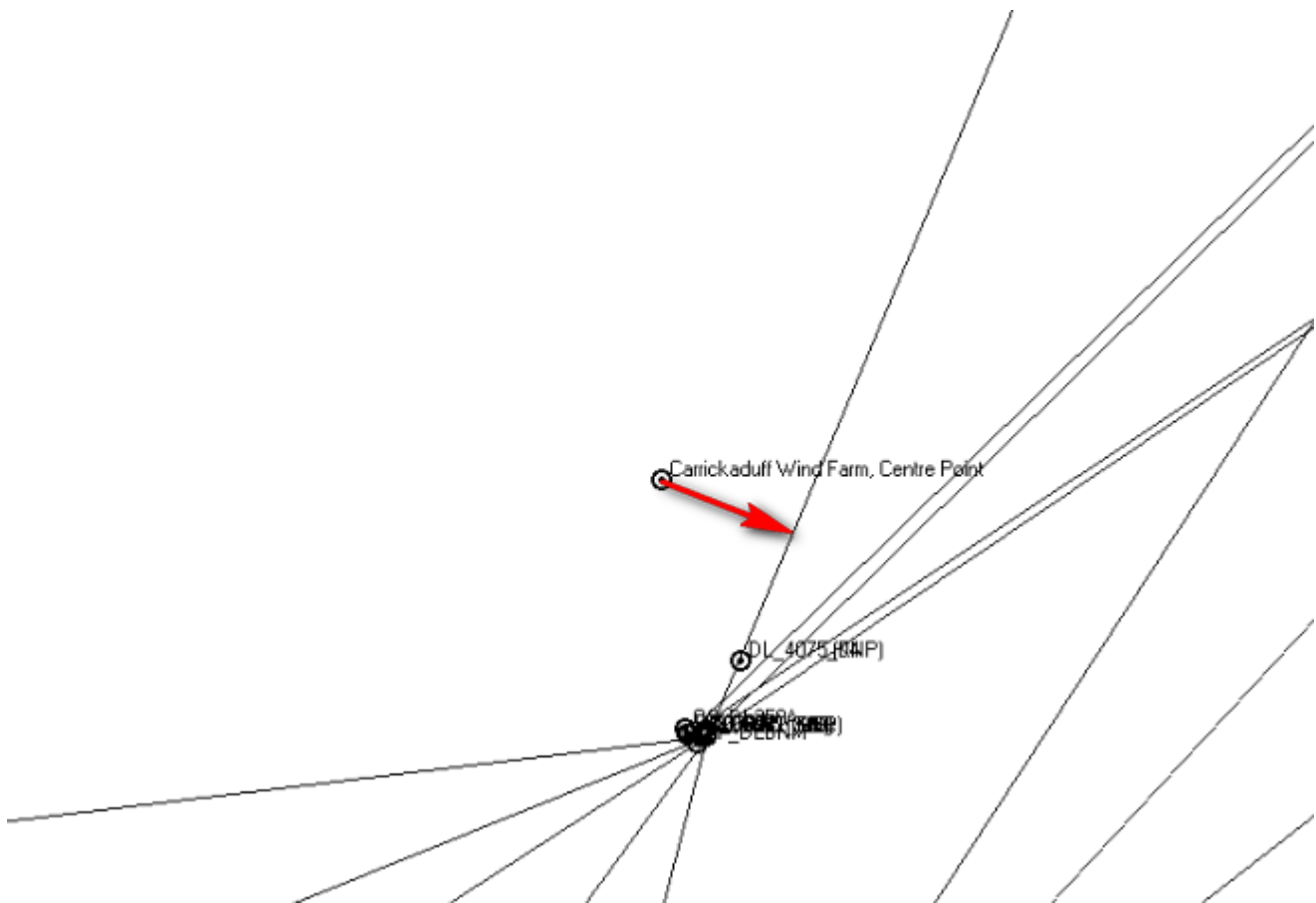
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From: Gerry Callan [mailto:Gerry.Callan@mosaicnet.ie]
Sent: 21 October 2016 10:56
To: Eoin McCarthy <emccarthy@mccarthykos.ie>
Cc: anthony.malone@bt.com; WindFarmsDG <windfarmsdg@mosaicnet.ie>; Alan Hutchinson <Alan.Hutchinson@mosaicnet.ie>
Subject: Re: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Eoin,

Based on the centre point of the proposed Carrickaduff Wind Farm development, the closest link we have is 500m to the South East:



It's an 18GHz link between Barnesmore Gap (203782,385475) and Coillte Welchtown (208868,397598).

As you can see above, any turbine to the North-West would not cause us any issues. Once the actual turbine locations have been confirmed, please let us know so we can carry out a more thorough analysis of the potential impact.

I hope this helps,

Best wishes,

Gerry Callan,
3/Mosaic,
3rd Floor, 5 Harbourmaster Place,
IFSC, Dublin 1.
Tel: 086 3884246
Remedy: Tech-Netshare-ANCO-Dimension-Trans_Eng

From: anthony.malone@bt.com <anthony.malone@bt.com>
Sent: 21 October 2016 10:10
To: Gerry Callan
Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Gerry,

Can you take a look at this for Eoin please?

Regards,
Anthony Malone
Transmission Operations Engineer
BT Ireland, Unit 2, Dundrum Business Park, Dundrum, Dublin 14
Mob: +353 (0)83 3704878
Landline: 01 432 6058

From: Eoin McCarthy [<mailto:emccarthy@mccarthykos.ie>]
Sent: 21 October 2016 09:47
To: Malone,A,Anthony,HQE3 R <anthony.malone@bt.com>
Subject: FW: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Anthony,

Please see email below which was sent to your three.ie email address.

Kind Regards,

Eoin McCarthy B.Sc. (Env.)
Project Environmental Scientist

McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants

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From: Eoin McCarthy
Sent: 21 October 2016 09:39
To: anthony.malone@three.ie
Subject: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Anthony,

You may have been previously contacted in 2014 in relation to the presence of Three Ireland telecom links in southeast Donegal.

We are carrying out an updated constraints study on the same proposed wind farm site south of Ballybofey and have been informed by Comreg that Three Ireland have links in this area. The co-ordinates of the approximate centre of the site is E203,614 N386,420.

Please also see attached a map of the site location.

Could you please advise as to the start and end points of Three links in this area.

Kind Regards,
Eoin

Eoin McCarthy B.Sc. (Env.)
Project Environmental Scientist

McCarthy Keville O'Sullivan Ltd.
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Lorraine Meehan

From: John Bagnall [mailto:John.Bagnall@mosaicnet.ie]
Sent: 13 December 2016 10:44
To: Lorraine Meehan <lmeehan@mccarthykos.ie>
Cc: David.Humphreys@meteor.ie; WindFarmsDG <windfarmsdg@mosaicnet.ie>
Subject: RE: 160502 - Proposed Carrickaduff Wind Farm, Co Donegal

Lorraine,

We would generally go with a buffer of 100meters too, but just to be sure can you send on the proposed turbine locations once selected to rule it out.

Kind regards,
John

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Lorraine Meehan

From: Gavin Byrne [mailto:gavin.byrne@netshare.ie]

Sent: 04 January 2017 09:23

To: Lorraine Meehan <lmeehan@mccarthykos.ie>

Cc: David Powders <david.powders@netshare.ie>; Kevin O'Neill <kevin.oneill@netshare.ie>; Darragh Dennehy <darragh.dennehy@netshare.ie>; Brian McHugh <brian.mchugh@netshare.ie>; Deirdre McDermott <deirdre.mcdermott@netshare.ie>; Ulrich Philipps <ulrich.philipps@netshare.ie>

Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Lorraine,

This looks fine and 600m is enough. For closure, when available, please send us all of the proposed turbine locations so that we can satisfy ourselves that there will be no impact. With the current topology provided, it looks like it will be fine.

Please keep us informed with future developments and when you intend to submit for Planning Permission.

Regards,

Gavin Byrne BE, MSc, MIEI
Transmission Planning & Strategy Engineer
Netshare Ireland
Iveagh Building, The Park, Carrickmines, Dublin 18

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Lorraine Meehan

From: Colin Kennedy [mailto:Colin.Kennedy@2rn.ie]
Sent: 21 October 2016 16:55
To: Eoin McCarthy <emccarthy@mccarthykos.ie>
Cc: Johnny Evans <Johnny.Evans@2rn.ie>
Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Eoin,

I refer to your email sent to my colleague, Johnny Evans, earlier today.

We have an important 6GHz microwave link which would appear to pass near the area under study. It links our main Truskmore transmitter in Co. Sligo with our Holywell Hill transmitter in Co. Donegal via a repeater station in Barnesmore.

The Irish Grid coordinates of the three sites are:

TRUSKMORE:	E 175953	N 347318
BARNESMORE	E 203752	N 385445
HOLYWELL HILL:	E 238461	N 417004

Regards,
Colin

Colin Kennedy
Frequency Planning Section



2rn, Block 'B', Cookstown Court, Old Belgard Road, Tallaght, Dublin 24, Ireland
Tel: ++353 (0)1 208 2261
RTÉ Transmission Network Ltd trading as "2rn"

Lorraine Meehan

From: Thomas Barry [mailto:Tom.Barry@TETRAIRELAND.IE]

Sent: 20 December 2016 13:15

To: Lorraine Meehan <lmeehan@mccarthykos.ie>

Subject: RE: 160502 - Proposed Carrickaduff Wind Farm, Co Donegal (1/2)

Lorraine,

We don't have any concerns about the development in its current form. Can you provide turbines locations when drafted please.

Regards,

Tom

Eoin McCarthy

From: Hugh Logue <Hugh.Logue@viatel.com>
Sent: 21 October 2016 11:44
To: Eoin McCarthy
Cc: Steven Caulfield
Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hello Eoin.

This will have no impact on our current network.

Regards,
Hugh Logue.

From: Eoin McCarthy [mailto:emccarthy@mccarthykos.ie]
Sent: 21 October 2016 09:42
To: Steven Caulfield <Steven.Caulfield@viatel.com>
Subject: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Steven,

You may have been previously contacted in 2014 in relation to the presence of Viatel Ireland Ltd. telecom links in southeast Donegal.

We are carrying out an updated constraints study on the same proposed wind farm site south of Ballybofey and have been informed by Comreg that Viatel have links in this area. The co-ordinates of the approximate centre of the site is E203,614 N386,420.

Please also see attached a map of the site location.

Could you please advise as to the start and end points of Viatel links in this area.

Kind Regards,
Eoin

Eoin McCarthy B.Sc. (Env.)
Project Environmental Scientist

McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants

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From: Eoin McCarthy
Sent: 21 October 2016 09:39
To: anthony.malone@three.ie
Subject: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Eoin McCarthy B.Sc. (Env.)
Project Environmental Scientist

McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants

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An Roinn
Ealaíon, Oidhreachta agus Gaeltachta
Department of
Arts, Heritage and the Gaeltacht

Your Ref: 130822
Our Ref: **G Pre00038/2014**
(Please quote in all related correspondence)

02 October 2014

Linda O'Grady
Project Planner
McCarthy Keville O'Sullivan Ltd
Planning & Environmental Consultants
Block 1, G.F.S.C.
Moneenageisha Road
Galway
Email: lgrady@mccarthykos.ie
Cc: dodowd@mccarthykos.ie

Re: Proposed Windfarm at Carrickaduff Hill and Lismullyduff, Co. Donegal

A chara

On behalf of the Department of Arts, Heritage and the Gaeltacht, I refer to the consultation on the above.

Outlined below are the heritage-related observations/recommendations of the Department under the following heading(s).

Nature Conservation

The Department has reviewed the Environmental Impact Statement Scoping Report for the proposal.

The proposed development is not situated within any lands designated Special Protection Area, Special Area of Conservation or Natural Heritage Area. However, the proposed development is situated in a location with the potential to impact on the River Finn Special Area of Conservation Site No. SAC 002301. It is also noted that the proposed development site is situated approximately 10km from and in a location with the potential to impact on the Pettigo Plateau Nature Reserve Special Protection Area Site No. SPA 004099 and the Lough Derg (Donegal) Special Protection Area Site No. SPA 004057. Also the connection of the proposed development to the National Grid (i.e. the proposed wind farm project has an approved Gate 3 connection in Clogher Substation) has the potential to impact on a number of designated sites including Natura 2000 sites, namely Lough Eske and Ardnamona Wood Special Area of Conservation Site No. SAC 000163, Croaghonagh Bog Special Area of Conservation Site No. SAC 000129, Lough Hill Bog Natural Heritage Area Site No. NHA 002452, Meenagarranroe Bog Natural Heritage Area Site No. NHA 002437, Barnesmore Bog Natural Heritage Area Site No. NHA 002375 and Cashelnavean Bog Natural Heritage Area Site No. NHA 000122. Please see the site synopses at www.npws.ie for a description of all of the sites. You should also consider the proximity of the proposed development to designated sites for nature conservation in Northern Ireland. The Department recommends that the Northern Ireland Environment Agency is also consulted regarding potential transboundary impacts from the proposed development. Also, due to the location and nature of the development it is the opinion of the Department that the proposal has the potential to impact on a number of other habitats and species mentioned in the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora), the EU Birds Directive (Council Directive 79/409/EEC), and protected under the Wildlife Acts 1976-2013. Please note that the proposed wind farm development

is within the 10km grid squares H09, H19, H29, H08, H18 and H28, where the following rare and protected species have been recorded:

- Globe Flower (*Trollius europaeus*) - Flora (Protection) Order, 1999;
- Irish Lady's-tresses (*Spiranthes romanzoffiana*) - Flora (Protection) Order, 1999;
- Marsh Fritillary (*Euphydras aurinia*) - Annex II EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora).

The Department is of the view that the proposed development:

- could significantly damage/destroy freshwater habitat and species in the River Finn/River Foyle catchment, including Atlantic Salmon (*Salmo salar*) and Otter (*Lutra lutra*), both of which are species listed in Annex II of the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora). Please note that Otter is also listed in Annex IV of the EU Habitats Directive. Any proposal that would be likely to cause an impact on the breeding or resting habitat of this species, would directly contravene Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations, 2011 and the judgement against Ireland of the European Court of Justice in case C-183/05;
- could significantly damage/destroy areas of heath/bog habitat. Please note that wet heath, dry heaths and blanket bog are all listed in Annex I of the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora), with active blanket bog listed as priority habitat;
- could significantly interfere with populations of migratory bird species including Greenland White-fronted Goose (*Anser albifrons flavirostris*), Whooper Swan (*Cygnus Cygnus*) and Greylag Goose (*Anser anser*). Please note that Greenland White-fronted Goose and Whooper Swan are listed in Annex I of the EU Birds Directive (Council Directive 79/409/EEC). The proposed development is on possible migratory routes/ bird flightlines;
- could significantly disturb populations of other migratory and breeding bird species including Hen Harrier (*Circus cyaneus*), Merlin (*Falco columbarius*), Golden Eagle (*Aquila chrysaetos*) and Golden Plover (*Pluvialis apricaria*), all of which are species listed in Annex I of the EU Birds Directive (Council Directive 79/409/EEC). Also the peatland habitat within and surrounding the proposed development site would not be untypical of that used by Red Grouse (*Lagopus lagopus hibernicus*) and Curlew (*Numenius arquata*), both of which are species in the Red List of Birds of Conservation Concern in Ireland;
- could significantly damage/disturb populations of terrestrial mammals such as the Irish Hare (*Lepus timidus hibernicus*), Badger (*Meles meles*) and bats species, all of which are species protected under the Wildlife Acts 1976-2010. Please note that all bat species is also listed in Annex IV of the EU Habitats Directive.

The potential impacts would be caused by the:

- Deterioration of the water quality in the Mourne Beg River and the River Finn resulting from pollution from surface water run-off during site preparation and construction, including road construction and the management of borrow pits;
- Deterioration of the water quality in the Mourne Beg River and the River Finn resulting from pollution from surface water run-off post construction;
- Deterioration of the water in the Mourne Beg River and the River Finn resulting from possible peat erosion and bog burst from the development;
- Direct loss of habitat associated with the development;
- Damage/Destruction to adjacent habitats due to inappropriate site preparation and construction techniques;
- Possible interference with the migratory routes and flightlines of wintering birds due to the development;
- Disturbance to local wildlife, including avifauna, during site preparation and construction, and due to the development;
- Damage to habitats and species, including designated sites, associated with the connection of the proposed development to the National Grid.

The Department recommends that the flora and fauna section in the Environmental Impact Statement (EIS) should address the potential impacts to the habitats and species listed above. Baseline information regarding these habitats and species may be available from the National Parks & Wildlife

Service (www.npws.ie), National Biodiversity Data Centre (www.biodiversityireland.ie), Inland Fisheries Ireland (www.fisheriesireland.ie) and BirdWatch Ireland (www.birdwatchireland.ie). Information from the National Parks & Wildlife Service should be sourced via the Data Request Form at www.npws.ie. The EIS should include robust measures that will avoid, reduce and mitigate for any significant impacts to nature conservation.

As the project that has the potential to significantly impact on the integrity of a number of Natura 2000 sites, an Appropriate Assessment as outlined in Article 6(3) of the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora) will be required as part of the planning consent process. The Appropriate Assessment should focus on the potential impacts in view of the site's conservation objectives (Qualifying Interests/Special Conservation Interests), and should include measures that will avoid, reduce and mitigate for any such impacts. Potential impacts must be considered in combination with other plans or projects, including other wind farm development. The Appropriate Assessment must establish and conclude that the proposed development does not pose a significant threat to the conservation objectives of the Natura 2000 sites, if the proposal/project is to proceed. Guidance regarding Appropriate Assessment is available at www.npws.ie (see Planning and Appropriate Assessment, Department of the Environment, Heritage & Local Government (2009): Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities).

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

You are requested to send any further correspondence to this Department's Development Applications Unit by email only to manager.dau@ahg.gov.ie; if this is not possible, correspondence may, alternatively, be sent to:

The Manager
Development Applications Unit
Department of Arts, Heritage & the Gaeltacht
Newtown Road
Wexford

Is mise, le meas



Muiris Ó Conchúir
Development Applications Unit
Tel: 053-911 7387



An Roinn
Ealaíon, Oidhreachta agus Gaeltachta
Department of
Arts, Heritage and the Gaeltacht

Your Ref: **PA0040**
Our Ref: **SID-2015-DG-01**
(Please quote in all related correspondence)

27 March 2015

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
Via email to: sids@pleanala.ie

Re: Section 37E application by Planree Limited - for permission for proposed Strategic Infrastructure Development Carrickduff Wind Farm for the provision of up to 49 wind turbines, two permanent meteorological masts, two 110kv electrical substations in the town lands of Gortnamuck, Raws Lower, Raws Upper, Egglybane, Tievebrack, Belalt, Owennagadrah, Ballyarrell Mountain or Cornashesk, Corradoeey, Corlea, Cronalaghy, Lismullyduff, Meenagolan, Meenreagh, Meenahinnis, Gortahork (ED Gleneely), Carn, Corraffrin, Kinletter, Tievecloghoge, Trusk, Taughboy, Meenbog and Croaghonagh, the proposed underground cable connection to the national grid will run under the existing road network through the townlands of Cashelnavean, Tawnawuly Mountains, Keadew Upper, Friarsbush, Ardinawark, Keadew Lower, and Cullionboy.

A chara

On behalf of the Department of Arts, Heritage and the Gaeltacht, I refer to the notification in relation to the above proposed strategic infrastructure development.

Outlined below are the heritage-related observations/recommendations of the Department under the stated headings.

Nature Conservation

The proposed development is not situated within any lands designated Special Protection Area, Special Area of Conservation or Natural Heritage Area. However, the proposed development is situated in a location with the potential to impact on the River Finn Special Area of Conservation SAC 002301. It is also noted that the proposed development site is situated approximately 10km from and in a location with the potential to impact on the Pettigo Plateau Nature Reserve Special Protection Area SPA 004099 and the Lough Derg (Donegal) Special Protection Area SPA 004057. Also, the connection of the proposed development to the National Grid (i.e. the proposed wind farm project has an approved Gate 3 connection in Clogher Substation) has the potential to impact on a number of designated sites including Natura 2000 sites, namely Lough Eske and Ardnamona Wood Special Area of Conservation SAC 000163, Croaghonagh Bog Special Area of Conservation SAC 000129, Lough Hill Bog Natural Heritage Area NHA 002452, Meenagarranroe Bog Natural Heritage Area NHA 002437, Barnesmore Bog Natural Heritage Area NHA 002375 and Cashelnavean Bog Natural Heritage Area NHA 000122. Please see the site synopses at www.npws.ie for a description of all of the sites.

An Bord Pleanála should also consider the proximity of the proposed development to designated sites for nature conservation in Northern Ireland. The Department recommends that the Northern Ireland Environment Agency is also consulted regarding potential transboundary impacts from the proposed development.

Due to the location and nature of the development it is the opinion of the Department that the proposal also has the potential to impact on a number of other habitats and species mentioned in the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora), the EU Birds Directive (Council Directive 79/409/EEC), and protected under the Wildlife Acts 1976-2013. Please note that the proposed wind farm development is within the 10km grid squares H09, H19, H29, H08, H18 and H28, where the following rare and protected species have been recorded:

- Globe Flower (*Trollius europaeus*) - Flora (Protection) Order, 1999;
- Irish Lady's-tresses (*Spiranthes romanzoffiana*) - Flora (Protection) Order, 1999;
- Marsh Fritillary (*Euphydras aurinia*) - Annex II EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora).

The Department is of the view that the proposed development:

- could significantly damage/destroy freshwater habitat and species in the River Finn/River Foyle catchment, including Atlantic Salmon (*Salmo salar*) and Otter (*Lutra lutra*), both of which are species listed in Annex II of the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora). Please note that Otter is also listed in Annex IV of the EU Habitats Directive. Any proposal that would be likely to cause an impact on the breeding or resting habitat of this species, would directly contravene Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations, 2011 and the judgement against Ireland of the European Court of Justice in case C-183/05;
- could significantly damage/destroy areas of heath/bog habitat. Please note that wet heath, dry heaths and blanket bog are all listed in Annex I of the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora), with active blanket bog listed as priority habitat;
- could significantly interfere with populations of migratory bird species including Greenland White-fronted Goose (*Anser albifrons flavirostris*), Whooper Swan (*Cygnus Cygnus*) and Greylag Goose (*Anser anser*). Please note that Greenland White-fronted Goose and Whooper Swan are listed in Annex I of the EU Birds Directive (Council Directive 79/409/EEC). The proposed development is on possible migratory routes/ bird flightlines;
- could significantly disturb populations of other migratory and breeding bird species including Hen Harrier (*Circus cyaneus*), Merlin (*Falco columbarius*), Golden Eagle (*Aquila chrysaetos*) and Golden Plover (*Pluvialis apricaria*), all of which are species listed in Annex I of the EU Birds Directive (Council Directive 79/409/EEC). Also the peatland habitat within and surrounding the proposed development site would not be untypical of that used by Red Grouse (*Lagopus lagopus hibernicus*) and Curlew (*Numenius arquata*), both of which are species in the Red List of Birds of Conservation Concern in Ireland;
- could significantly damage/disturb populations of terrestrial mammals such as the Irish Hare (*Lepus timidus hibernicus*), Badger (*Meles meles*) and bats species, all of which are species protected under the Wildlife Acts 1976-2012. Please note that all bat species is also listed in Annex IV of the EU Habitats Directive.

The potential impacts would be caused by the:

- Deterioration of the water quality in the Mourne Beg River and the River Finn, and their associated streams, resulting from pollution from surface water run-off during site preparation and construction, including road construction and the management of borrow pits;
- Deterioration of the water quality in the Mourne Beg River and the River Finn, and their associated streams, resulting from pollution from surface water run-off post construction;

- Deterioration of the water in the Mourne Beg River and the River Finn, and their associated streams, resulting from possible peat erosion and bog burst from the development;
- Direct loss of habitat associated with the development;
- Damage/Destruction to adjacent habitats due to inappropriate site preparation and construction techniques;
- Possible interference with the migratory routes and flightlines of wintering birds due to the development;
- Disturbance to local wildlife, including avifauna, during site preparation and construction, and due to the development;
- Damage to habitats and species, including designated sites, associated with the connection of the proposed development to the National Grid.

The Department has reviewed the Environmental Impact Statement (EIS) and the Natura Impact Statement (NIS) prepared as part of the proposal. Many of the Department's concerns outlined above have been sufficiently addressed in these documents. However, the Department continues to have concerns regarding the following:

- The Department considers the area between Carrickduff Hill and Lough Mourne of being of significant importance as a breeding area for Hen Harrier (*Circus cyaneus*), which is species listed in Annex I of the EU Birds Directive (Council Directive 79/409/EEC). The Department also considers the lands around Tievecloghoge and Kinletter as an important winter roost site for this species. The Department can confirm that two pairs of Hen Harrier bred within the 1km grid squares H07 88 (Croaghnagawn) and H07 87 (Meenbog) in 2013. The Department regularly expect 2-3 nest sites to be occupied annually in this area. This is not reflected in the bird survey data, and therefore the collision risk analysis for the project. There was no effort to map bird activity across the proposed development site. Also the analysis of impact seems to focus primarily on collision risk and due consideration has not been given to displace and disturbance to Hen Harrier from the development. It is noted that displacement is considered only within 100m of the turbines. The EIS refers to Pearce-Higgins et al. (2009), regarding a study of bird behaviour in the vicinity of upland wind farms in northern England and Scotland. This reports reduced Hen Harrier flight activity around wind turbines as much as 50% less than would be expected within 500 metres of a turbine. Reduction in flight activity as an effect of turbine proximity was extrapolated to yield predicted reduction in breeding densities in proximity to wind turbines. Figure for displacement in the EIS would be significantly greater if a 500m loss was considered. The precautionary principle would suggest that this figure should be used in relation to Hen Harrier. The Department recommends that a further Hen Harrier breeding survey is conducted in 2015, with special attention to traditional breeding sites. The application may wish to contact local National Parks and Wildlife Service (NPWS) staff to determine the locations of traditional nest sites. Also, the Department recommended that bird activity for Annex I species (Whooper Swan, Hen Harrier, Merlin, Peregrine Falcon, Golden Eagle and Golden Plover) is mapped across the proposed development site, and the collision risk is revised based to take account of any new information, and that there is further analysis of impacts in relation to displacement/disturbance;
- The Department notes that a Construction and Environmental Management Plan (CEMP) will be in place prior to the start of the construction phase and a Preliminary CEMP has already been prepared. The Department also notes that a detailed habitat enhancement plan will be prepared in consultation with the NPWS prior to the commencement of the construction phase of the proposed development. A draft or outline of this plan should be included as part of the EIS. The habitat enhancement plan should also consider the appropriate on-going management of the five E.U. Habitats Directive Annex I habitats which are present within the study area, i.e. Natural Dystrophic Lakes and Ponds, Atlantic Wet Heaths with *Erica tetralix*, European dry heaths, active Blanket Bog and Blanket Bog;

- The EIS states that all temporary storage areas will be assessed by an ecologist, geotechnical engineer and hydrologist prior to being used to temporarily store overburden destined for future reuse. The EIS must outline the criteria for selection of temporary storage locations, as well as the measures to be put in place to prevent peat/erosion/bog burst and any deterioration in water quality, including the water quality downstream in Natura 2000 sites;
- The EIS states in relation to construction timing that construction will not commence during the Breeding Bird season from April to July inclusive, and that construction may commence at any stage from August onwards to the end of March. Please note that the recognised bird-breeding season (Wildlife Act 2000) is from March to August inclusive. The Department recommends that any works to be carried out within March and August and with the potential to impact on breeding birds, should be preceded by a survey to determine if birds are breeding in the immediate area. Appropriate avoidance and mitigation measures should be put in place if any breeding birds are detected;
- The EIS has outlined detailed mitigation regarding drainage and for the protection of water quality, including measures to protect water quality in the River Finn Special Area of Conservation SAC 002301 and in the Lough Eske and Ardnamona Wood Special Area of Conservation SAC 000163. Please note that the underground connection to the permitted 110kV substation in the townland of Cullionbuoy (Clogher DED), Co. Donegal, referred to as the 'Clogher' substation in this EIS, will cross the Lowerymore River immediately upstream of the Lough Eske and Ardnamona Wood Special Area of Conservation SAC 000163. The works will be confined to the road carriageway. Works at this location have the potential to significantly impact on the Natura 2000 site. The Board should be satisfied that the mitigation measures outlined are robust, and are sufficient to ensure that there will not be a significant adverse effect on the integrity of the Natura 2000 sites;
- In the Appropriate Assessment Screening, potential significant impacts have been ruled out in relation to the Pettigo Plateau Nature Reserve SPA, Donegal Bay SPA, Lough Derg (Donegal) SPA and Lough Nillan Bog SPA. Lough Swilly is a major staging post for wintering birds on migration, especially swans and geese. One would have assumed that the Barnesmore Gap would be an important transit corridor for these birds when dispersing throughout the country on autumn migration and when returning on spring migration. Anecdotal reports would indicate a movement of birds through this area. However, the Department accept that there is a significant information gap on bird movement/transit corridors on migration. The survey effort associated with the EIS is noted. However, due to the location of the proposed development, the Department believes that there needs to be a better understanding of bird dispersal from Lough Swilly and movements through the Barnesmore Gap, before the Department can support the view that the proposal will not impact on bird mitigation, and that the potential for significant impacts can be screened out in relation to nearby Special Protection Areas, in particular the Pettigo Plateau Nature Reserve Special Protection Area SPA 004099 and the Lough Derg (Donegal) Special Protection Area SPA 004057.

Accordingly, prior to making any decision, it is recommended that the applicant be requested to provide additional information to address the concerns outlined above.

Archaeology

The proposed development is large in scale consisting of a 49-turbine wind farm in twenty-six townlands, 2 No. 110kV electrical substations, underground cable connection through seven townlands.

Archaeological assessment

The proposed development is located within an area rich in archaeological remains, indicating a continuum of human activity from the Neolithic to Post-Medieval periods. There is potential for the discovery of archaeological material during the construction of the proposed wind farm.

Archaeological Heritage – recommended conditions


Given the potential for the discovery of hitherto unrecorded archaeological remains, the Department recommends that the following conditions be attached to any grant of permission that may issue in relation to this application:

1. The Archaeological Mitigation Measures detailed in Section 12.6 of the Environmental Impact Statement shall be implemented in full. All accessible areas of proposed construction works (either temporary or permanent) shall be subject to archaeological test excavations prior to the commencement of construction works.

The acknowledgement to this letter, any further information and the An Bord Pleanála order should ideally be sent to manager.dau@ahg.gov.ie; if this is not possible, correspondence may alternatively be sent to:

The Manager
Development Applications Unit
Department of Arts, Heritage and the Gaeltacht
Newtown Road
Wexford

Is mise, le meas



Rónán Whelan
Tel: 053-911 7376



An Roinn Ealaíon, Oidhreachta,
Gnóthaí Réigiúnacha, Tuaithe agus Gaeltachta

Department of Arts, Heritage,
Regional, Rural and Gaeltacht Affairs

Your Ref: **160502**

Our Ref: **G Pre00360/2016**

(Please quote in all related correspondence)

03 February 2017

Ms. Lorraine Meehan B.Sc. (Env.)
Environmental Scientist
McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants
Block 1,
G.F.S.C.
Moneenageisha Road,
Galway
H91 N8KK

Via email: lmeehan@mccarthykos.ie

Re: EIA Scoping Document for Proposed Carrickaduff Wind Energy Development, County Donegal

A Chara,

On behalf of the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, I refer to your letter of 28th November 2016 and the Environmental Impact Assessment (EIA) Scoping Document received in connection with the above.

Further to the archaeological observations/recommendations of the Department which we issued to you on the 9th January 2017 please find heritage related observations/recommendations of the Department outlined below under the stated heading.

Nature Conservation

The following observations are intended to assist you in meeting the obligations that may arise in relation to European sites, other nature conservation sites, and biodiversity and environmental protection in general in the context of the current proposal, including any future application for consent. The observations are not exhaustive, and are made without prejudice to any recommendation that may be made by this Department in the future. Data collected and surveys carried out in connection with this proposed development may raise other issues that have not been considered here.

In this case, as there was a previous unsuccessful application for a proposed wind energy development that overlapped with the current site, you will be aware of the ecological and nature conservation concerns of the Department (please see attached letters which were issued in relation to preplanning case Ref GPre00038/2014 and SID Ref SID-2015-DG-01). In preparing a

new Environmental Impact Statement (EIS) and Natura Impact Statement (NIS), (if required for the current proposed development), you should have regard to these submissions.

Other Plans and Projects

Potential cumulative or in combination effects of other plans and projects should be considered at this early stage. This should include the Donegal County Development Plan 2012-2018 and any other relevant new plans or projects, particularly those that may have come into being subsequent to the previous application.

Project components

In general, the EIS (and NIS if required) should include sufficient project details so that the full nature and extent of the project are known and assessed in relation to, among other things, turbine and road design and construction methodologies; site drainage details, including settlement ponds; temporary and permanent storage or disposal areas for peat and other materials or wastes arising; extraction sites/borrow pits; and any modifications to roads, bridges or culverts along the entire length of haul routes. Volumes of surplus material arising and of fill required should be calculated. Due consideration should also be given to the grid connection and its likely effects.

As the proposed site location includes peatland, there should be full consideration of the amount of peat to be excavated, stored, and disposed/recovered. A detailed plan for the safe storage, disposal and rehabilitation of excavated or disturbed peat should form part of the EIS. The spreading or recovery of excavated peat on areas of intact bog, wet and revegetated areas of cutover bog or other habitats or vegetation of ecological value is unlikely to be acceptable. Excavated or exposed peat should not pose any threat to surface waters and water quality. Any proposals to combine peat disposal with habitat restoration or rehabilitation measures will require a detailed plan to show the location, nature and area of lands in question, and provide details of how such areas will be reinstated, managed and improved for habitats and/or species, together with proposals for monitoring and reporting. This plan should be prepared by a suitably qualified ecologist in consultation with a hydrologist and other experts as necessary.

The associated impacts of quarrying or extraction should be included among the considerations at the earliest stages of project planning and design, and should be assessed fully in the EIS. Reinstatement or restoration plans will be required for any quarries or borrow pits on-site and should be included in the EIS. As with any other part of the development, all quarries/borrow pits (existing or proposed) to be used in construction should be included within the application area for the proposed development, or should already be permitted.

A detailed site drainage map will be required and should show all existing watercourses, drainage ditches, flushes, lakes or ponds; new drainage ditches; all outfall points to watercourses or lakes; and all settlement ponds.

If tree felling is required at this site, it should be included as an intrinsic element of the overall development, the impacts and implications of which should be assessed fully in the EIS. The extent of tree felling should be mapped, and the future use and management of all cleared areas should be specified. The impacts of tree felling on wildlife, habitats and surface waters (e.g. water quality) should be assessed fully, including the risk of Phosphate mobilisation from peat soils as a result of tree clearance and ground disturbance.

Tree felling is licensed and regulated by the Forest Service; any additional requirements in respect of this element of the proposed development, including any obligations to replant on other lands, should be made known at the planning application stage, and assessed as part of the EIS as appropriate. If restoration of planted areas is proposed as mitigation or compensation for negative ecological effects, the EIS should include a detailed plan to show the location, nature and area of habitat to be reinstated, and provide details of how such areas will be reinstated, managed and improved for habitats and/or species, together with proposals for monitoring and reporting. This

plan should be prepared by a suitably qualified ecologist in consultation with other experts as appropriate.

The likely impacts of grid connection, particularly for birds, sensitive habitats and surface waters, should be given due consideration in project planning and when preparing the EIS and NIS.

Any improvement or reinforcement works required for access and transport anywhere along the proposed haul route(s) should be included in the EIS and NIS, as appropriate, and subjected to ecological impact assessment with the inclusion of mitigation measures where necessary.

Available Information

You are advised to consult the National Parks and Wildlife Service (NPWS) website (www.npws.ie) as a key source of data, information and publications on nature conservation sites and biodiversity issues of potential relevance to the area and the environmental assessment(s). This includes site boundaries, site synopses, lists of qualifying interests (Special Areas of Conservations (SACs)) and special conservation interests (Special Protection Areas (SPAs)), conservation objectives (European sites), features of interest (Natural Heritage Areas (NHAs)), and dates of site designation. GIS datasets are available for download for nature conservation sites, and for certain habitats and species arising from various sources, including national surveys. Other NPWS-held data on habitats and species may be requested by submitting a 'Data Request Form' through the NPWS website. The link for this is <https://www.npws.ie/maps-and-data/open-data-policy>. Site synopses for non-statutory proposed NHAs, or proposed NHAs (pNHAs), can be made available on request.

Site-specific conservation objectives (SSCOs), and associated backing documents, are available for some European sites on the NPWS website. GIS datasets associated with site-specific conservation objectives are also available for download at <https://www.npws.ie/maps-and-data/habitat-and-species-data>.

For all other European sites, generic conservation objectives are available and the most up-to-date versions should be used and referenced in any relevant documents.

The Habitats Directive Article 17 reports for 2007 and 2013, which should also be consulted, are available from <http://www.npws.ie/article-17-reports-0>. The recent national report on Article 12 of the Birds Directive is also accessible on the NPWS website at <https://www.npws.ie/news/birds-directive-article-12-reporting>.

The national habitat surveys that have been undertaken, and their resulting reports, should be consulted, including for information regarding the definitions and evaluations that have been developed for Annex I habitat types in Ireland.

In addition to the above, data on ecological features and environmental factors in or near the project area will be available from various other sources including, for example:

- Other organisations, e.g. Donegal County Council (e.g. natural heritage projects and data collection), National Biodiversity Data Centre, BirdWatch Ireland, Bat Conservation Ireland, etc.;
- EISs, NISs and other reports for projects in the general area.
- Natura Impact Reports (NIRs) and Strategic Environmental Assessment (SEA) Environmental Reports for plans in the general area

Conservation Objectives

European sites: assessment and analysis of likely significant effects on European sites should be carried out with respect to the conservation objectives or the site(s), taking account of existing

conservation status, and the cumulative or in combination effects of other plans and projects in all cases. The most recent version of the conservation objectives should be used and referenced in relevant documentation. It should also be noted that, in the case of generic conservation objectives, the objectives are to maintain or restore the favourable conservation condition of the listed qualifying interests (SACs) or special conservation interests (SPAs), so the assessment and analysis should cover both scenarios. In the case of site specific conservation objectives, parameters are set for individual qualifying interests and special conservation interests (i.e. attributes and targets) and these should be used in the assessments and analyses that are undertaken; these objectives specify whether conservation status is to be maintained or restored. Account should be taken of the 'notes/guidelines' on page 3 of these objectives. Each of the individual conservation objectives of relevance should be addressed separately in the analysis undertaken.

Surveys and Assessments

You have indicated that certain ornithological and other ecological surveys are underway. The extent of survey areas, and the survey methodologies that are used during this project, should be informed by appropriate specialists or experts, taking current best practice into account, and with particular regard to the key questions to be answered in relation to the implications for the conservation objectives of European sites in the case of the NIS (if required) in particular. If the 'zone of influence' concept is used, the scientific basis for its delineation and the area(s) involved should be made clear in any documentation. The same should also apply if a distance criterion, such as the 15km distance, is used.

It is advised that no zone of influence or distance criterion should be identified until there has been thorough examination of what ecological effects might result from the project (alone and in combination with other plans and projects), and what sites and ecological receptors might be at risk from the type of project in the area in question, noting that screening for appropriate assessment should be based on best scientific knowledge and objective information. A similar approach is also advised in identifying which surveys and survey methodologies are required so that any future NIS can be relied upon to provide the complete, precise and complete, precise and definitive findings and conclusions that are capable of removing all reasonable scientific doubt as to the effects of the project on a European site. Any NIS must contain the scientific data and analysis necessary to address the key issues of relevance and to reach robust conclusions; it cannot rely solely on data and general surveys from an EIS.

The following important ecological receptors should be included among the considerations at the current constraints study stage and in the flora and fauna section of any future EIS:

- Sites with nature conservation designations, including proposed NHAs, including the reasons for their designation, and their conservation objectives, where available;
- Annex IV (Habitats Directive) species of fauna and flora, and their breeding sites and resting places, which are strictly protected under the European Communities (Birds and Natural Habitats) Regulations, 2011;
- Other species of fauna and flora which are protected under the Wildlife Acts, 1976-2000;
- 'Protected species and natural habitats', as defined in the Environmental Liability Directive (2004/35/EC) and European Communities (Environmental Liability) Regulations, 2008, including:
 - Birds Directive – Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur);
 - Habitats Directive – Annex I habitats, Annex II species and their habitats, and Annex IV species and their breeding sites and resting places (wherever they occur);
 - Other habitats of ecological value in a national to local context;
 - Stepping stones and ecological corridors covered by Article 10 of the Habitats Directive.

In addition, the following will be required to assess the likely effects of the project on sites, habitats, and species of flora and fauna:

- Habitat survey of the site and surrounds, following the Heritage Council methodology (Atkins 2010), and with particular focus on any Annex I or potential Annex I habitats present;
- Identification, description, evaluation and mapping of any Annex I habitats present, including in terms of the vegetation communities, flora and fauna present, as appropriate. Correspondence with Annex I habitat types, or not, should be analysed and justified on scientific grounds;
- A habitat map of the site and surrounds with the footprint of the entire project, all lands required, and all works areas and access routes overlain, to enable impacts on habitats to be quantified and qualified;
- Botanical survey of the receiving environment to be undertaken at the appropriate time of year to properly characterise and evaluate the habitats present, and identify any rare or protected species, including bryophytes;
- Faunal surveys of the receiving environment to be undertaken at appropriate times of the year to identify any rare or protected species that use the site and surrounding areas, including but not limited to the following:
 - Bird surveys at a sufficient frequency over all relevant periods (winter, breeding, spring and autumn migration) during at least one full year to determine bird usage of the site and surrounds,
 - Mammal surveys, including multi-season bat surveys;
 - Aquatic species surveys.

The receiving environment should be defined to include all areas that will be impacted directly and indirectly by the development as per above.

The likely effects on sites, habitats and species should be assessed in the light of all aspects of project development at site preparation, construction and operation stages, and should take into account direct, indirect and cumulative impacts, as appropriate. Impacts should be qualified and quantified, where possible. Information on local geology, hydrology, soils and peat stability should be taken into account.

Full details of mitigation measures to avoid, reduce or offset negative effects should be provided in the EIS and NIS, including specifying sensitive periods for works. Only minor details of project execution and mitigation may be left to the post-consent stage and to method statements or other management plans. If there is uncertainty as to the likely effects at consent stage, this is likely to indicate deficiencies in the EIS and NIS.

Freshwater pearl mussel

It is important that the needs of the Freshwater Pearl Mussels are considered in relation to water quality and hydrology. The current version of the 'Margaritifera Sensitive Areas' map and accompanying explanatory note can be found at <https://www.npws.ie/maps-and-data/habitat-and-species-data>.

The applicant should also refer to The European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009, SI 296 of 2009. Useful reference material on freshwater pearl mussels including volumes 8-9 of The Irish Wildlife Manuals can be found on <http://www.npws.ie/publications/irishwildlifemanuals/>.

Monitoring

This Department recognises the importance of pre and post construction monitoring. The applicant should not use any proposed post construction monitoring as mitigation to supplement inadequate

information in the assessment. Please refer to Circular Letter PD 2/07 and NPWS 1/07 on this issue. This can be downloaded from the NPWS's website at <http://www.npws.ie/sites/default/files/general/circular-npws-02-07.pdf>

The EIS process should identify any pre and post construction monitoring which should be carried out. The post construction monitoring should include bird and bat strikes/fatalities including the impact on any such results of the removal of carcasses by scavengers. Monitoring results should be made available to the competent Authority and copied to this Department. A plan of action needs to be agreed at planning stage with the Planning Authority if the results in future show a significant mortality of birds and/or bat species.

Alien invasive species

The EIS should also address the issue of invasive alien plant and animal species, such as Japanese Knotweed, and detail the methods required to ensure they are not accidentally introduced or spread during construction. Information on alien invasive species in Ireland can be found at <http://invasives.biodiversityireland.ie/> and at <http://invasivespeciesireland.com/>.

Licenses

Where a proposed development impacts on protected species and their habitats, resting or breeding places, licenses may be required under the Wildlife Acts or derogations under the Habitats Regulations. In particular, bats and otters are strictly protected under annex IV of the Habitats Directive and a copy of Circular Letter NPWS 2/07 entitled "Guidance on Compliance with Regulation 23 of the Habitats Regulations 1997 – strict protection of certain species/applications for derogation licences" can be found on the NPWS website at <http://www.npws.ie/sites/default/files/general/circular-npws-02-07.pdf>.

It should be noted however that this Regulation has been replaced by SI 477 of 2011 and that section 53 is the relevant section.

Licenses will also be required if there are any impacts on other protected species or their resting or breeding places, such as on protected plants, badger setts or birds' nests. Where possible, hedges and trees should not be removed during the nesting season (i.e. March 1st to August 31st). Bird's nests can only be intentionally destroyed under licence issued under the Wildlife Acts of 1976 to 2012.

In order to apply for any such licenses or derogations as mentioned above the results of a survey should be submitted to this Department. Such surveys are to be carried out by appropriately qualified person/s at an appropriate time of the year. Details of survey methodology should also be provided.

Should survey work take place well before construction commences, it is recommended that an ecological survey of the development site should take place immediately prior to construction to ensure no significant change in the baseline ecological survey has occurred. If there has been any significant change mitigation may require amendment and where a licence has expired, there will be a need for new licence applications for protected species.

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

You are requested to send further communications to this Department's Development Applications Unit (DAU) at manager.dau@ahg.gov.ie (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager
Development Applications Unit (DAU)
Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

A handwritten signature in blue ink that reads "Sinéad O'Brien". The signature is written in a cursive style with a large initial 'S'.

Sinéad O' Brien
Development Applications Unit



An Roinn Ealaíon, Oidhreachta,
Gnóthaí Réigiúnacha, Tuaithe agus Gaeltachta

Department of Arts, Heritage,
Regional, Rural and Gaeltacht Affairs

Your Ref: **160502**

Our Ref: **G Pre00360/2016**

(Please quote in all related correspondence)

09 January 2017

Ms. Lorraine Meehan B.Sc. (Env.)
Environmental Scientist
McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants
Block 1,
G.F.S.C.
Moneenageisha Road,
Galway
H91 N8KK

Via email: lmeehan@mccarthykos.ie

Re: Pre-Planning Application Reg. Ref. G Pre00361/2016. This is a proposed wind energy development. There is no layout as yet but it is likely to exceed 25 turbines and or 50MW capacity at Carrickaduff, Meenbog and adjacent townlands in Co. Donegal.

A Chara,

On behalf of the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading.

Archaeology

It is noted in Section 6.1 of the Environmental Impact Assessment (EIA) scoping document that Tobar Archaeological Services have been commissioned to prepare an Archaeological Assessment report of the proposed site as part of the EIA.

The Department will forward recommendations based on the Archaeological Assessment once the report has been submitted.

Reason: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.

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

You are requested to send further communications to this Department's Development Applications Unit (DAU) at manager.dau@ahg.gov.ie (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager
Development Applications Unit (DAU)
Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

A handwritten signature in blue ink that reads "Sinéad O'Brien". The signature is written in a cursive style with a large initial 'S'.

Sinéad O' Brien
Development Applications Unit

Lorraine Meehan

From: Eilish Keating [mailto:Eilish.Keating@defence.ie]
Sent: 03 March 2017 10:27
To: Lorraine Meehan <lmeehan@mccarthykos.ie>
Subject: FW: 160502 - EIA Scoping Carrickaduff WF, Co. Donegal

Hi Lorraine,

I refer to your e-mail (see below) regarding the proposed Carrickaduff Wind Farm.

Apologies for the delay in getting back to you. The Air Corps have now advised that they will stand by their previous observations from 2015 *"Given that the western cluster of 26 turbines (hereafter referred to as Site 1) are elevated and are shielded by the natural geographical feature of Barnesmore Gap, Site 1 will NOT greatly impact Air Corps operations, although it is technically inside our 3 NM requirements."*

I hope that this clarifies the matter for you. Please do not hesitate to contact me if you have any further queries.

Again, I would request that we be notified when the planning application is being made.

Kind regards
Eilish

Eilish Keating
Property Management Branch
Tel. (045) 492189

From: Eilish Keating
Sent: 18 January 2017 13:01
To: 'Lorraine Meehan'
Subject: RE: 160502 - EIA Scoping Carrickaduff WF, Co. Donegal

Hi Lorraine,

Thank you for your e-mail below. I have passed you query onto to the Air Corps for their advice and I will contact you once I receive their reply.

Regards
Eilish

Eilish Keating
Property Management Branch.
Tel. (045) 492189

From: Lorraine Meehan [mailto:lmeehan@mccarthykos.ie]
Sent: 13 January 2017 10:45
To: Eilish Keating
Subject: RE: 160502 - EIA Scoping Carrickaduff WF, Co. Donegal

Eilish,

Thank you for the scoping response received yesterday regarding the proposed Carrickaduff wind farm. We note the comments below in relation to lighting requirements and can notify you when the application in made.

In relation to the comment on consultation with the Air Corps, "In line with our position on Wind Farms, the Air Corps regards the N15 as a "critical low level route" and is "opposed to the erection of windfarms or tall structures within 3NM of the route centreline which could affect Air Corps' ability to access regional areas", please see the attached document. We originally applied for planning permission for a wind farm development at this site in early 2015. During that planning process, the Air Corps via the IAA made the attached submission to An Bord Pleanála in April 2015. It refers to the N15 corridor and the standard request for a clearance of 3 NM, but goes on to state that:

"Given that the western cluster of 26 turbines (hereafter referred to as Site 1) are elevated and are shielded by the natural geographical feature of Barnesmore Gap, Site 1 will NOT greatly impact Air Corps operations, although it is technically inside our 3 NM requirements."

While the new proposal will not have the exact same turbine layout as that previously proposed, it occupies the same site and we are assuming that the comment made in the 2015 submission still stands, i.e. that the 3 NM clearance is not a requirement in locating turbines within the western side of the site. Could you confirm if this remains the case please?

If you have any queries please do not hesitate to contact me.

Kind regards,

Lorraine

Lorraine Meehan B.Sc. (Env.)
Environmental Scientist

McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants

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From: Eilish Keating [<mailto:Eilish.Keating@defence.ie>]
Sent: 12 January 2017 12:30
To: Lorraine Meehan <meehan@mccarthykos.ie>
Subject: EIA Scoping Document for Proposed Carrickaduff Wind Energy Development, Co. Donegal

Dear Lorraine,

I refer to your letter of 1st December, 2016 regarding the proposed Carrickaduff Wind Energy Development, Co. Donegal.

Based on the information provided in your e-mail and following consultations with the Air Corps, the Department of Defence has the following objection to make:

"In line with our position on Wind Farms, the Air Corps regards the N15 as a "critical low level route" and is "opposed to the erection of windfarms or tall structures within 3NM of the route centreline which could affect Air Corps' ability to access regional areas".

In all locations where windfarms are permitted it should be a condition that they meet the following lighting requirements:

- (1) Single turbines or turbines delineating corners of a windfarm should be illuminated by high intensity obstacle lights
- (2) Obstruction lighting elsewhere in a windfarm will be of a pattern that will allow the hazard be identified and avoided by aircraft in flight.
- (3) Obstruction lights used should be incandescent or of a type visible to Night Vision Equipment. Obstruction lighting fitted to obstacles must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum specifically at or near 850nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light”.

Also, we would request that we be notified when the planning application is being made.

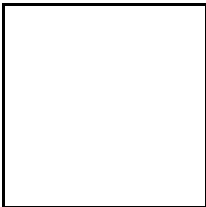
Kind regards
Eilish

Eilish Keating,
Property Management Branch,
Department of Defence.
Tel: (045) 492189

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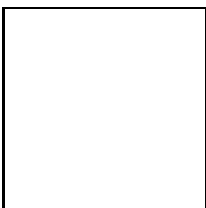
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Eoin McCarthy

From: Dominic Crudden <dominic.crudden@emrsolutions.ie>
Sent: 11 November 2016 11:32
To: Eoin McCarthy
Cc: Lorraine Meehan
Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Eoin,

I've plotted those turbine locations and there are no locations listed which would impact on our fixed links so we would have no issue with any of them. I've used 100m micro-siting so if there is any movement of a turbine greater than 100m please let us know and we will reassess.

Regards,
Dominic

From: Eoin McCarthy [mailto:emccarthy@mccarthykos.ie]
Sent: 07 November 2016 09:01
To: Dominic Crudden <dominic.crudden@emrsolutions.ie>
Cc: Lorraine Meehan <lmeehan@mccarthykos.ie>
Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Dominic,

The current proposed rotor diameter is 117 metres however this is subject to change.

In terms of micro-siting, as we are only at the design stage we will be allowing environmental and material constraints to inform the final proposed turbine layout.

Regards,
Eoin

Eoin McCarthy B.Sc. (Env.)
Project Environmental Scientist

McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants

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From: Dominic Crudden [mailto:dominic.crudden@emrsolutions.ie]
Sent: 04 November 2016 15:24
To: Eoin McCarthy <emccarthy@mccarthykos.ie>
Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Thanks Eoin,

Can you let me know the maximum blade radius of the turbines and if there is any micro-siting proposed for the coordinates that you provided.

Regards,
Dominic

From: Eoin McCarthy [<mailto:emccarthy@mccarthykos.ie>]
Sent: 03 November 2016 09:20
To: Dominic Crudden <dominic.crudden@emrsolutions.ie>
Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Dominic,

Please see attached an excel list of the proposed turbine coordinates in Irish Grid.

Kind Regards,
Eoin

Eoin McCarthy B.Sc. (Env.)
Project Environmental Scientist

McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants

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From: Dominic Crudden [<mailto:dominic.crudden@emrsolutions.ie>]
Sent: 28 October 2016 14:16
To: Eoin McCarthy <emccarthy@mccarthykos.ie>
Subject: RE: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Eoin,

We don't give out customer end points to 3rd parties but if you send us the details and coordinates of the proposed turbines we will do an assessment of any impact on the links.

Regards,
Dominic

From: Derek Glynn
Sent: 24 October 2016 13:26
To: Dominic Crudden <dominic.crudden@emrsolutions.ie>
Cc: Alan Feenan <alan.feenan@emrsolutions.ie>; Dean Reardon <dean.reardon@emrsolutions.ie>
Subject: FW: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Dominic

See attached

Derek

From: Eoin McCarthy [<mailto:emccarthy@mccarthykos.ie>]
Sent: 21 October 2016 09:35
To: Dean Reardon
Subject: 160502 - Carrickaduff Wind Farm, Co. Donegal - Telecoms

Hi Dean,

You may have been previously contacted in 2014 in relation to the presence of MP&E telecom links in southeast Donegal.

We are carrying out an updated constraints study on the same proposed wind farm site south of Ballybofey and have been informed by Comreg that MP&E Trading Company have links in this area. The co-ordinates of the approximate centre of the site is E203,614 N386,420.

Please also see attached a map of the site location.

Could you please advise as to the start and end points of MP&E links in this area.

Kind Regards,
Eoin

Eoin McCarthy B.Sc. (Env.)
Project Environmental Scientist

McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants

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Lorraine Meehan

From: Yvonne Jackson [<mailto:Yvonne.Jackson@failteireland.ie>]

Sent: 05 December 2016 10:41

To: McCarthy Keville O'Sullivan Ltd. <info@mccarthykos.ie>

Subject: RE: 160502 - Proposed Carrickaduff Wind Energy Development - Scoping Letter

Dear Aoife,

I wish to acknowledge receipt of your recent e-mail to Fáilte Ireland in relation to the **proposed Carrickaduff Wind Energy Development, Co. Donegal**. I have attach a copy of the Fáilte Ireland's Guidelines for the treatment of tourism in an EIS, which we recommend should be taken into account in preparing the EIS.

Regards,

Yvonne

Yvonne Jackson

Investment and Innovation | Fáilte Ireland | Áras Fáilte | 88/95 Amiens Street | Dublin 1

T: 01 8847224

W: www.failteireland.ie



7th December 2016

Lorraine Meehan,
McCarthy Keville O'Sullivan Ltd,
Block 1, G.F.S.C.,
Moneenageisha Road,
Galway,
Co. Galway



Re: Proposed Carrickaduff Wind Energy Development, Co. Donegal.

Dear Ms. Meehan,

I refer to your letter of 1st December 2016 in relation to the above proposal.

Inland Fisheries Ireland (IFI) made an observation to the Planning Authority on the original application dated 13th February 2015 and you may have a copy of this. However I have enclosed that observation for your convenience.

The proposed wind farm project is almost totally outside of IFI's operational area except for the length of cabling that extends along the Lowerymore River to the Clogher 110kv substation.

Should the proposal proceed to planning, IFI's comments will be along the same lines as our previous observation on the first application, providing that the fundamental elements remain the same.

I trust this is of assistance.

Yours Faithfully,

Brendan Maguire

Senior Fisheries Environmental Officer

13th February 2015
Our Ref: P/7/15

An Bord Pleanála,
64 Marlborough,
Dublin 1.

Re: Proposed Carrickaduff Wind farm project Co Donegal by Planree Ltd.
Strategic Infrastructure Application.

Dear Sir/ Madam,

It is noted that a significant length of cabling from the proposed wind farm will be along the N15 road and connecting to the Clogher 110kv substation. This section of cabling is within the Lowerymore River catchment, a salmonid and developed tributary of the River Eske system. Prior to any trenching works taking place which will be necessary to lay the power cable, a contingency plan/works methodology must be developed in relation to any pumping that may be required along this section of cabling. Pumping directly to the Lowerymore River from work areas is not an option favoured by Inland Fisheries Ireland.

The contractor should take cognisance of the proximity of the Lowerymore River and the N15 carriageway and the fact that significant sections of river bank have been reinforced. This highlights the severe degree of erosion the river is prone to during spate conditions and cabling must not jeopardise the integrity of the existing bank protection.

Director- North Western River Basin District
Yours faithfully,

Milton Matthews



IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA HÉIREANN

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Lorraine Meehan
McCarthy Keville O'Sullivan Ltd.
Block 1
G.F.S.C.
Moneenageisha Road
Galway

15th December 2016

RE: EIA Scoping Document for the Proposed Carrickaduff Wind Energy Development, Meenbog, Co. Donegal

Dear Ms. Meehan,

Thank you for your invitation to comment and advise with reference to the above document. The Irish Peatland Conservation Council (IPCC) has been campaigning to conserve a representative sample of Irish peatlands and their biodiversity for future generations for over 30 years. Our work is guided by our 6th action plan, ***Ireland's Peatland Conservation Action Plan 2020*** which can be downloaded from our website at www.ipcc.ie. Many of the actions in our plan have been included within the National Peatlands Strategy which has been adopted by every government department and Local Authority. We would also draw your attention to this document to ensure your project complies with its requirements. The National Peatlands Strategy can be downloaded from www.npws.ie.

The IPCC recognise the fundamental importance of increasing Ireland's renewable energy sector as part of international efforts to combat climate change and reduce dependency on fossil fuels. We further recognise that wind energy is a cleaner renewable source of energy, which is deserving of government support when taking into account the external environmental costs posed by electricity generated from fossil fuel sources. However, we still cannot support the above proposed development for the same reasons outlined by my colleague in a letter dated 26th March 2016 to An Bord Pleanála. I am sending the letter as an email attachment with our concerns and comments for your consideration in preparing your Environmental Impact Assessment.

In addition the IPCC also have these additional comments we would like you to consider. It is difficult to return a fully informed response when we do not have exact numbers and locations of the wind turbines for your proposed development nor do we have details of your habitat and wildlife surveys. Therefore my response is based on there being at a minimum 25 wind turbines within the site boundary.

Query on Protected Sites

With reference to Chapter 2.3 of your scoping document I note that you have listed 13 sites of conservation importance within the 15 km buffer zone and in Figure 2.2 of the same document there are 21 sites of conservation importance labelled within the 15km buffer zone. In your Natura Impact Statement (NIS) from your first planning application to an Bord Pleanála (Ref. 05.PA0040) there were 51 sites of conservation importance listed as occurring within the 15 km buffer zone. Please refer to the attached letter from IPCC to An Bord Pleanála dated 26th March 2015 for further details. I would appreciate it if you would you clarify the discrepancy in the number of protected sites within the 15 km buffer zone between the previous and the current development proposal.

OVER 30 YEARS TAKING ACTION FOR BOGS AND WILDLIFE

Charity No/Uimhir Carthanacht: CHY6829 Registered in Ireland No/Uimhir Cláraithe in Éirinn: 116156 Registered Office/Oifig Cláraithe: Lullymore, Rathangan, Co. Kildare, Ireland

Company Secretary/Rúnaí Comhlacht: Rachel Kavanagh

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Patrons/Pátrúnaí: Pauline Bewick, Don Conroy, HRH Princess Irene of the Netherlands,

Eanna Ní Lamhna, Matthijs Schouten, His Excellency Mr Paul Schellekens Netherlands Ambassador to Ireland

Assessing Long Term Hydrological Impacts

Maintaining hydrological integrity has been proven to be an essential function in maintaining peatlands in good conservation status. I recommend that you conduct a hydrological study at landscape level, incorporating all wetland and aquatic protected sites and any other peatland sites that may be of local or county conservation importance, to assess the impact of your proposed development on the integrity of these sites of conservation importance over time. Perhaps LiDAR technology that has been used for various hydrological modelling studies on designated peatlands would be an appropriate tool to achieve this.

Atmospheric pollution

According to the IPCC Action Plan 2020 negative impacts from the development of wind farms on peatlands include the release of large amounts of carbon dioxide into the atmosphere during the installation of wind farms thus contributing to climate change. I note from your scoping document that the site location occurs on cutover bog. It is IPCC policy to promote the restoration and conservation of all peatlands in Ireland as there are so few left and not to utilise them for any activities that will continue to degrade the habitat, environment and atmosphere. I therefore recommend that you conduct a study to determine if any peatland sites in your 15 km buffer zone are likely to emit CO₂ as a result of your proposed development as this may be in conflict with the National Plan to reduce GHG emissions by 20% by 2020.

Frogs

Frogs are indicator species of wetlands in good condition. There are over 35 records of frogs on the IPCC national frog database within the 15km buffer zone. This is not surprising given the quantity of designated wetland and aquatic sites in and adjacent to the proposed development location. I recommend that your ecologists also conduct a comprehensive frog survey within the 15km buffer zone and consider for your EIA any potential negative impacts the wind farm development may have on frog populations within the buffer zone during the construction phase and in the long term.

Invasive Species

From IPCC peatlands database I have identified that at least one designated site within the 15km buffer zone is threatened by invasive species (*Rhododendron ponticum*), namely Lough Eske SAC. It is unclear from the scoping document as to whether there is a plan to prevent potential introductions or spread of invasive species to the development site during construction phase. If there is no plan I would recommend one be introduced to assure the ecological integrity of the surrounding landscape.

Peatlands within the 15km buffer zone

With reference to Chapter 5.1 of your scoping document I note that the minimum buffer zone for protected sites from a development is a minimum 200m. However I wish to make you aware that fen peatlands can be hydrologically damaged by indirect human activities within a 5km radius of the fen. I would like to make you aware that fens are a significant habitat in your project location as they are a rare habitat type in West Donegal. Durnesh Lough SAC and Lough Eske SAC listed in your 15km buffer zone contain transition/reedbed fen habitat. From the IPCC's peatland database we have identified another fen of major local importance inside your buffer zone; Raphoe Fen. Raphoe Fen is already threatened by agriculture and drainage and it may well be a possibility that your proposed development would further threaten the conservation of this rare habitat.

To follow are a list of current threats and damage to designated sites within 15 km buffer zone from the IPCC sites database:

Lough Nillan Bog SAC:

Site Threats; afforestation, erosion, drainage, mechanical turf cutting and overgrazing.

Site Damage: afforestation, burning, drainage, erosion, hand cutting turf, mechanical turf cutting and overgrazing.

Meenaguse Scragh SAC:

Site Threats; overgrazing and development of hydroelectric scheme.

Site Damage: erosion, overgrazing roads and dam construction.

Meenaguse/Ardbane Bog SAC:

Site Threats; afforestation, drainage, mechanical turf cutting and overgrazing.

Site Damage: afforestation, burning, drainage, erosion, hand cutting turf, mechanical turf cutting and overgrazing.

Croaghonagh Bog SAC:

Site Threats; drainage, mechanical turf cutting and water abstraction.

Site Damage: afforestation, drainage, hand cutting turf, mechanical turf cutting and overgrazing.

Cashelnavean Bog NHA:

Site Threats; afforestation, mechanical turf cutting.
Site Damage: afforestation and overgrazing.

Barnesmore Bog NHA:

Site Threats; afforestation, mechanical turf cutting and wind farm development.
Site Damage: afforestation, mechanical turf cutting, overgrazing and wind farm development.

Lough Eske SAC:

Site Threats; invasive species.

Meenagarranroe Bog NHA:

Site Threats; afforestation, burning, drainage, hand cutting turf and mechanical turf cutting.
Site Damage: drainage, hand cutting turf and mechanical turf cutting.

Lough Hill Bog SAC

Site Threats; afforestation, burning, drainage and mechanical turf cutting.
Site Damage: burning, drainage, hand cutting turf and mechanical turf cutting.

Moneygal Bog ASSI:

Site Threats; mechanical turf cutting and hand cutting turf.
Site Damage: hand cutting turf.

Dunragh Loughs/Pettigo Plateau SAC:

Site Threats; afforestation and wind farm development.
Site Damage: afforestation, hand cutting turf and overgrazing.

Durnesh Lough SAC:

Site Threats; drainage.
Site Damage: water pollution.

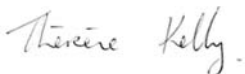
In light of the information on existing threats and damage to designated peatlands within the 15km buffer zone the IPCC thinks that any large scale developments such as this proposed wind farm would only further threaten these already damaged, sensitive and rare peatland habitats.

In conclusion, I recommend that in proceeding with your EIA that you adopt the precautionary principal approach at all stages and to all environmental matters that may impact on or arise from peatlands as a result of your proposed development. Along with improving your bird surveying techniques I hope that you will incorporate the considerations and recommendations of my response and those of my colleague from 26th March 2015 (see email attachment).

I would be much obliged if you would forward me on maps with the new turbine layout and any other ecological information that you have when it becomes available.

In the meantime if you have any queries on any of the information I am sending you, please do not hesitate to get in touch.

Yours Sincerely,



Therese Kelly B.Sc. Env. Sc.
Conservation Policy & Fundraising Officer

ENC: IPCC correspondence 26th March 2016 to An Bord Pleanala



IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA HÉIREANN

Lullymore, Rathangan, Co. Kildare, Ireland
Liolach Mór, Rath Iomgáin, Co. Chill Dara, Éire

Tel/Teil: +353-(0)45-860133
e-mail/ríomhphost: bogs@ipcc.ie web/idirlíon: www.ipcc.ie

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

26th March 2015

ABP Reference: PL05.PA0040

Provision of up to 49 no. wind turbines, two permanent meteorological masts, two 110kv Electrical Substations and all associated works at Meenbog and other townlands, Co. Donegal

A Chara,

The Irish Peatland Conservation Council would like to submit an observation on the above proposed development which is being dealt with under the Strategic Infrastructure Development process by An Bord Pleanála. The IPCC are an Environmental NGO with a mission statement of protecting a representative portion of Ireland's peatlands. Included is €50 to cover the cost of this submission. Below are the comments of the IPCC.

The IPCC recognise the importance of increasing the renewable energy sector as part of efforts to combat climate change and reduce dependency on the abstraction of non-renewable resources such as peat and oil. However, the IPCC cannot support the above proposed development as it would result in the destruction of a mosaic of blanket bog and upland heath habitats. Blanket Bog is an internationally rare habitat accounting for less than 3% of the world's peatlands. In an international context, the blanket bogs of Ireland and the UK form the largest single contribution (10 - 15%) to a globally scarce resource (Malone & O'Connell 2009). Only 21% of the original area of blanket bog remains intact in Ireland today and only 20% of the original area of blanket bog in Co. Donegal is intact. The EIS (table 6.55) shows that a further 2.95 hectares at least of this priority habitat will be permanently lost. We have both a European and an International obligation to protect this rare and threatened habitat for future generations under the EU Habitats Directive and under the Ramsar Convention.

Designated sites

The proposed development site is adjacent to a large number of areas designated for nature conservation. From the list provided in the Natura Impact Statement (Table 3.1, page 47) it can be seen that within a 15km radius of the development there are an extraordinary amount of protected sites. The NIS points to 15 Special Areas of Conservation (4 abutting the development), 4 Special Protection Areas, 13 Areas of Scientific Interest (ASSI), 5 Natural Heritage Areas (2 abutting) and 14 proposed Natural Heritage Areas. This makes a total of 51 sites of conservation concern falling within a 15km radius of this site.

This highlights the importance of the area for biodiversity and the need for it to be managed accordingly. Overall these sites support a wide variety of habitat, a number of which are listed on Annex I of the EU Habitats Directive; **7130** Active Blanket Bog, **7230** Alkaline fens, **4030** European dry heaths, **5130** *Juniperus communis* formations on heaths, **4010** Northern Atlantic wet heaths with *Erica tetralix*, Alpine and Boreal Heaths & **7140** Transition mires and quaking bogs.

It should be noted here that in the most recent assessment of these protected habitats the National Parks and Wildlife Service (Anon 2013) concluded that the overall status of these habitats was either **POOR** or **BAD**. In many cases there is in fact a decline in the overall status of these habitats between 2008 and 2013 (the reporting years). The development of windfarms atop these protected habitats is not conducive to the now required restoration of these areas if we are to meet our obligations under the EU Habitats Directive.

30 YEARS TAKING ACTION FOR BOGS AND WILDLIFE

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Accepting that there is some overlap between the designated sites IPCC maintain that erecting this wind farm in an area so rich in terms of conservation worthy habitat and supporting so many protected sites acknowledging same defies logic.

This point is further reinforced by the response of the National Parks & Wildlife Service to the scoping for this project where they detail the risks to designated sites from the development.

This submission states

“... the proposed development is situated in a location with the potential to impact on the River Finn Special Area of Conservation Site No. SAC 002301. It is also noted that the proposed development site is situated approximately 10km from and in a location with the potential to impact on the Pettigo Plateau Nature Reserve Special Protection Area Site No. SPA 004099 and the Lough Derg (Donegal) Special Protection Area Site No. SPA 004057. Also the connection of the proposed development to the National Grid (i.e. the proposed wind farm project has an approved Gate 3 connection in Clogher Substation) has the potential to impact on a number of designated sites including Natura 2000 sites, namely Lough Eske and Ardnamona Wood Special Area of Conservation Site No. SAC 000163, Croaghonagh Bog Special Area of Conservation Site No. SAC 000129, Lough Hill Bog Natural Heritage Area Site No. NHA 002452, Meenagarranroe Bog Natural Heritage Area Site No. NHA 002437, Barnesmore Bog Natural Heritage Area Site No. NHA 002375 and Cashelnavean Bog Natural Heritage Area Site No. NHA 000122.”

While this information was key in ensuring the production of a Natura Impact Statement IPCC feel that the developer has not sufficiently ensured that the potential impacts of this large scale development have been mitigated against.

Species

The EIS acknowledges the presence of a large number of protected species in the vicinity of the site, which further enforces the need for conservation geared management.

A number of wild birds of conservation interest are known to use the area throughout the year. The Greenland White fronted goose, *Anser albifrons flavirostros*, is a winter visitor and is listed on Annex I of the EU Birds Directive and in the Irish Red Data Book. Red Grouse, *Lagopus lagopus*, is a species that has suffered large declines in Ireland and is now Red-listed by Birdwatch Ireland in the Birds of Conservation Concern in Ireland 2008 - 2012. The Golden Plover, *Pluvialis apricaria*, is found on the same list and is a species which is particularly susceptible to wind farm development (see Pearce-Higgins *et al.* 2008 case study on Golden Plover enclosed). The Hen Harrier is another currently much persecuted bird which is successfully breeding in the area. The proposed development will involve the destruction and removal of a significant amount of habitat ideal for the Hen Harrier (forestry & open bog) which is listed as an Annex 1 species under the EU Birds Directive.

IPCC would like to draw your attention to one particular study (Pearse-Higgins *et al.* 2009) which found that 7 of 12 species studied showed significantly lower frequencies of occurrence close to turbines. This study (enclosed) is of particular relevance given that a large number of the endangered species found in the surrounds of the development area for this wind farm were the study subjects in question. Serious thought must be given before allowing construction of a potentially damaging development in an area known to support a number of protected birds.

Conclusion

With the aim of protecting the rare and threatened blanket bog habitat and the birds of international concern, the above proposed development should not be permitted to go ahead. IPCC would consider your approval of this development to be setting a very bad example for nature conservation and could compromise Ireland's commitment to conserving protected areas throughout the country.

The species diversity of blanket bog and upland habitats is rich, containing 15% of the Irish flora, 49% of Ireland's endangered birds and 26% of Irish mammals. All of these species are strongly adapted to the environmental conditions prevailing in peatland habitats. Ireland's targets in reducing habitat loss and increasing biodiversity cannot be achieved for peatlands, if windfarms are allowed to substantially disrupt the habitat refuge of species.

IPCC object to this development and would urge you to reverse planning permission for it. It cannot be considered sustainable as it will deteriorate the conservation status of an area that is extraordinarily rich in biodiversity and recognised as such with the designation of a large number of sites for conservation and the known presence of a large number of protected species.

Thank you for taking the time to read this submission which I hope will help in concluding the correct decision for this area.

Is mise le meas,



Tadhg O Corcora MSc
Conservation Officer, IPCC.

ENC: €50 cash to cover cost of submission to An Bord Pleanála
Pearce-Higgins *et al.* 2008 paper
Pearce-Higgins *et al.* 2009 paper

REF: Anonymous 2013. *The status of EU Protected Habitats and Species in Ireland*. National Parks and
Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin, Ireland

Malone, S. & O'Connell, C. 2009. *Ireland's Peatland Conservation Action Plan 2020*. Irish Peatland
Conservation Council, Lullymore, Rathangan, Co. Kildare. 2009

Pearse-Higgins, J. W., Stephen, L., Langston, R. H. W., & Bright, J.A. 2008. Assessing the cumulative
impacts of wind farms on peatland birds: a case study of golden plover *Pluvialis apricaria* in Scotland

Pearse-Higgins, J. W., Stephen, L., Langston, R. H. W., Bainbridge, I. P. & Bullman, R. 2009. The
distribution of breeding birds around upland wind farms. *Journal of Applied Ecology*, **46**, 1323 - 1331

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RE: EIA Scoping Document for Proposed Carrickaduff Wind Energy Development, Co. Donegal

Dear Ms Meehan,

Irish Water (IW) acknowledges receipt of your letter dated 7th December regarding the EIA scoping for the above development. Irish Water's stance has not changed in relation to this site. The objective to develop this water supply remains and therefore the information stated in the submission dated May 12th also remains relevant to this site.

Yours Sincerely,

P.P. [Signature]

Suzanne Dempsey
Spatial Planning Strategy Specialist



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Lorraine Meehan
McCarthy Keville O'Sullivan Ltd
Block 1, G.F.S.C
Moneenageisha Road
Galway



Our Ref: 973 – 2016

Your Ref: 160502

Re: EIA Scoping Document for Proposed Carrickaduff Wind Energy Development, Co Donegal

Dear Ms Meehan,

I refer to your correspondence dated 1st December 2016 received in our head office Trim, regarding the above.

This office would like to make the following observations:

There are no Arterial Catchment Drainage Schemes located within the area of works proposed and illustrated in your correspondence of 01/12/16.

There are no records of flooding identified in the proposed project location of the Flood Hazard Mapping website (www.floods.ie).

Under Section 50 of SI No.122 of 2010, no person, including a body of corporate, shall construct any new bridge or alter, reconstruct, or restore any existing bridge over any watercourse without the consent of the Commissioners or otherwise than in accordance with plans previously approved of by the Commissioners.

Yours Sincerely



Karen Donovan
Engineering Services Administration Unit
10th January 2017



Ms. Lorraine Meehan B.Sc (Env.)
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Dáta | Date

Ár dTag | Our Ref.

Bhur dTag | Your Ref.

15 December 2016

TII16-96252

160502

RE: EIA Scoping Document for Proposed Carrickaduff Wind Energy Development, Co. Donegal

Dear Ms. Meehan,

I refer to your letter and enclosures of 1 December 2016 regarding the above. The position in relation to your enquiry is as follows.

Transport Infrastructure Ireland (TII) wishes to advise that it is not in a position to engage directly with planning applicants in respect to proposed developments. TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines as outlined in the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

TII notes the proposed site extents extend to the N15, national primary road, at a location on the network that is subject to a general 100kph speed limit. In such circumstances, the developer/applicant should be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply.

The developer/applicant should consider access to the proposed development in the context of official policy which is outlined in Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines (2012) and therefore, avoid proposals that conflict with the provisions of the foregoing official policy.

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

With respect to Environmental Impact Statement (EIS) scoping issues, the recommendations indicated below provide only general guidance for the preparation of EIS, which may affect the National Roads Network.

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

- Consultations should be had with the relevant Local Authority/Roads Design Office with regard to locations of existing and future national road schemes,
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, i.e. N15,
- The developer should assess visual impacts from existing national roads,
- The developer should have regard to any EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts,
- The developer, in conducting Environmental Impact Assessment, should have regard to TII Publications,
- The developer, in conducting Environmental Impact Assessment, should have regard to TII's Environmental Assessment and Construction Guidelines, including the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (National Roads Authority, 2006),
- The EIS should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see Guidelines for the Treatment of Noise and Vibration in National Road Schemes (1st Rev., National Roads Authority, 2004)),
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. TII's TTA Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the TII TTA Guidelines which addresses requirements for sub-threshold TTA,
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required,
- In the interests of maintaining the safety and standard of the national road network, the EIS should identify the methods/techniques proposed for any works traversing/in proximity to the national road network,
- In relation to haul route identification, the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed,
- In relation to cabling and potential connection routing, the scheme promoter should note locations of existing and future national road schemes, outlined above, and develop proposals to safeguard proposed road schemes. In the context of existing national roads, the developer should be aware that separate approvals may be required for works traversing the national road network. TII requests referral of agreements between the local authority and the scheme promoter related to national roads.

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

I hope that the above comments are of use in your scoping process.

Yours sincerely,

P.P. Mark Byrne
Michael McCormack
Senior Land Use Planner