

Planning Response Team
Klondyke Building
Cromac Avenue
Gasworks Business Park
Lower Ormeau Road
Belfast
BT7 2JA
Tel: 028 9056 9604
Email: planningresponse.team@daera-ni.gov.uk

Date: 18 January 2017

Dear Sir/Madam

Planning Application Ref.: LA11/2016/1055/TBA
Location: Carrickaduff
Meenbog and adjacent townlands
Co Donegal
Proposal: Wind Farm Development

DAERA acknowledges receipt of your letter dated 11/01/2017 advising that the planning authority has received notice in writing, under Regulation 8(1) of The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2015 (The "EIA Regulations") that the developer intends to submit an Environmental Statement for the above proposal.

In line with our duties under Regulation 9 (1) of The EIA Regulations, and when requested by the developer, DAERA will make available to the developer any information in our possession that DAERA considers relevant to the preparation of the environmental statement. As requested, all information or other comments passed to the developer will be copied to the planning authority.

To assist the developer with the initial scoping stage we recommend that they refer to DAERA's guidance and advice outlining the key environmental considerations for this type of development, available at

<https://www.daera-ni.gov.uk/topics/environmental-advice-planners/information-required-planning-consultations>

Kind Regards

Planning Response Team

On behalf of DAERA



Planning Service
(Through Planning Portal)

Ref: LA11/2016/1055/TBA

Forest Service
Inishkeen House
Killyhevlin
Enniskillen BT74 4EJ
Phone 028 6634 3124
E-mail: john.griffin@daera-ni.gov.uk
www.daera-ni.gov.uk/forestry

9th February 2017

Dear Sir/ Madam

Re: Application Reference: LA11/2016/1055/TBA, Proposed Windfarm at Carrickaduff, Meenbog and adjacent townlands, Co Donegal.

Request for information relevant to the preparation of an environmental statement

I refer to your letter of notification with regard to the intention to submit a planning application and environmental statement (where required) for the proposed windfarm at Carrickaduff, Meenbog and adjacent townlands, Co Donegal.

Location: The proposed windfarm is located in Co Donegal on lands adjacent to Glenderg and Moneygal Forests, Co Tyrone.

Proposed Development Boundaries: The Woodland Register¹ identifies one large forest block Glenderg Forest along the southern and eastern boundaries of the area containing wind turbines numbered T1-T20. The area containing wind turbines T43-T49 borders Moneygal Forest along its south-eastern boundary. Both these forests are managed by Forest Service and the woodland type is predominantly conifer. Glenderg Forest is inhabited by red squirrels and hen harriers also frequent this forest. Part of Moneygal Forest consists of a raised bog which is designated as a Special Area of Conservation (SAC) and an Area of Special Scientific Interest (ASSI). The Register also identifies a small grant-aided broadleaved woodland planted in 2014 adjacent to Moneygal Forest and within 70m of the southeastern boundary of the proposed windfarm.

Yours sincerely,

John Griffin
Grants & Regulations Branch

¹ <http://www.dardni.gov.uk/index/forestry/the-forest-industry/woodland-register.htm>



An Agency within the Department of
**Agriculture and
Rural Development**
www.dardni.gov.uk

AN ROINN
Talmhaíochta agus
Forbartha Tuaithe
MÁINNISTRE O.
Fáirns an
Kintra Fordèrin



**INVESTORS
IN PEOPLE**



Derry City & Strabane
District Council

Comhairle Chathair Dhoire
& Cheantar an tSraitha Báin

Derry Cittie & Stràbane
Destrìck Cooncil

LA11/2016/1055/TBA: Intention to submit an Environmental Impact Statement for a 'Proposed Carrickaduff Wind Farm Development at Meenbog and adjacent townlands, Co. Donegal

Planning Authority: An Bord Pleanála

Proposal: The proposed development will likely constitute the provision of the following:

- (i) > 25 wind turbines
- (ii) > 50MW installed capacity

Environmental Health Service Comments

The Environmental Health Service (EHS) of Derry City and Strabane District Council have been consulted on this transboundary application as the assessment of wind turbine noise impacting on noise sensitive receptors falls within the EHS's remit. It is understood that the proposed wind farm is located in Co. Donegal but may have the potential to impact on noise sensitive properties located in Northern Ireland (Co Tyrone). The applicant has not yet settled on a final turbine number or layout and it is assumed that the noise impact assessment shall be incorporated within the Environmental Impact Statement. This department previously commented on a similar application in the same area by the same applicant (Planree Ltd) for 49 turbines.

Appropriate Noise Impact Assessment Criteria

In the previous application submitted by this applicant (J/2015/0036/TBA) the 'Planning Guidelines on Wind Energy' published by the DoEHLG were adopted as the appropriate noise criteria for application to Northern Ireland properties. This department would highlight that in Northern Ireland the relevant Department of Environment Planning Policy Statement is PPS18 "Renewable Energy". The Best Practice Guidance to the Application of Planning Policy Statement 18 refers to 'ETSU-R-97 - The Assessment and Rating of Noise from Wind Farms' in relation to the appropriate noise limits to be applied to wind farm developments in the UK. When preparing noise reports for inclusion in an Environmental Impact Assessment (EIA) wind farm developers in Northern Ireland (NI) must also apply the ETSU-R-97 methodology in line with the good practice outlined in the IOA's 'Good Practice Guide to the application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise' (GPG) which was endorsed by the NI Department of Environment Minister. As the proposed development may have significant transboundary effects, Environmental Health requires the applicant to apply these standards to the collection of background noise levels, derivation of noise limits, and prediction of turbine noise levels at any relevant noise sensitive receptors in Northern Ireland. The noise assessment must also include all wind farm developments in the vicinity with the potential to have a cumulative noise impact at any of the relevant properties.

In section 10.4.2.8 of the EIS submitted in support of J/2015/0036/TBA the applicant stated that one of the recommendations from the Department of Trade and Industry's (DTI) ETSU-R-97 publication, was that "a lower fixed limit of 45dB_{LA90}/5dB above background noise; at nearby noise sensitive locations is considered appropriate to provide protection to wind energy development neighbours". This is incorrect and this department would like to take this opportunity to clarify that a limit of 45dB_{LA90} or maximum increase of 5dB above background noise is only recommended in Northern Ireland where a property occupier has a financial involvement with a proposed development. In all other circumstances the applicable noise limit is the greater of a lower limit set between 35-40dB_{LA90} (with the agreement of the strategic Planning Division), or +5dB over the background, during quiet daytime hours; and the greater of 43dB_{LA90}, or +5dB over the background noise level at night. These limits are normally set from the cut-in wind speed of the wind turbine up to 12ms⁻¹. The applicant is advised to contact the DfI Strategic Planning Division for further information on applicable noise limits for properties in Northern Ireland.

Noise from a similar wind energy development planning proposal in Northern Ireland which exceeds a lower fixed limit of 35dB_{LA90} at any wind speed up to a maximum of 10ms⁻¹ at any non-financially associated properties automatically triggers the necessity for:-

- a) a noise assessment compliant with ETSU-R-97 and the associated GPG and;
- b) the comparison of noise predictions against the criteria described above to demonstrate that the development is acceptable on noise grounds.

Conclusion

1. EHS is of the opinion that potential exists for a significant transboundary impact due to noise. EHS is of the opinion that noise impact on properties located in Northern Ireland must be assessed in accordance with the noise standards and noise prediction methodologies relevant to the Northern Ireland jurisdiction. EHS recommends that the DfI advise An Bord Pleanála that a noise impact assessment which is fully compliant with ETSU-R-97 and the associated Institute of Acoustics GPG methodology be submitted for consideration. EHS can then provide an opinion in relation to the potential noise impact at properties associated with the proposed development in isolation and also cumulatively with all other relevant wind energy developments in the vicinity. In the absence of such an assessment Environmental Health would not be in a position to advise the Strategic Planning Division on implications of the noise impact of this development
2. It is recommended that the Department of Environment advise An Bord Pleanála as to the 'lower fixed daytime noise limit' and 'night-time noise limit' that the Department expects the applicant to achieve in respect of noise sensitive receptors located in Northern Ireland.

The Department of Environment could request An Bord Pleanála to instruct the applicant to provide a noise impact assessment where noise limits have initially been based initially on a lower daytime fixed limit of 35dBL_{A90}. If the applicant then wishes to avail of a higher noise limit at any properties in Northern Ireland ETSU-R-97 describes three criteria for the planning authority to consider when determining the fixed part of the limit in the range 35-40 dBL_{A90}, all of which should be considered. These are:

- a) The number of noise affected properties
- b) The potential impact on the power output of the wind farm
- c) The likely duration and level of exposure.

This information would allow the Department of Environment to provide An Bord Pleanála with a considered response. Environmental Health can advise the Department of Environment in relation to the likely duration and level of exposure element when the information is provided by the applicant.

Issued on behalf of the Environmental Health Service

Date:- 17th May 2017

Historic Environment Division
Causeway Exchange
1-7 Bedford Street
Belfast
BT2 7EG

Tel: 028 9082 3100
Email:
HEDPlanning.General@communities-
ni.gov.uk

Date: 31 January 2017

Dear Sir/Madam

Planning Application Ref.: LA11/2016/1055/TBA
Location: Carrickaduff
Meenbog and adjacent townlands
Co Donegal
Proposal: Wind Farm Development

Thank you for your consultation on the above application, received by DfC on 11/01/2017

Historic Environment Division (HED) has reviewed the details of the application and provides summary comments as follows:

Archaeology and Built Heritage

HED Historic Buildings has considered the information provided and advises the application may have limited effect or an impact on the setting of the listed buildings within the locality: Should it be determined that an Environmental Impact Assessment (EIA) is required, Historic Buildings consider that a listed building section is not required in the Cultural Heritage/ Material Assets Chapter of the Environmental Statement.

HED Historic Monuments:

HED: HM recommend that any subsequent EIA should have a Cultural Heritage section that includes:

1. A detailed assessment of the impact of the proposed development on the setting of the Scheduled and State Care monuments within the environs of the proposed application site. This should include a cumulative impact assessment that includes an assessment of the impact of this site along with similar wind farms and wind turbine sites nearby.

Should you seek further clarification on any of the issues raised in this response, please do not hesitate to contact the HED Planning Team.

Kind Regards

Historic Environment Division

Issued on behalf of Department for Communities

Archaeology & Built Heritage

Section Reference SM11/1 TYR 15:05

Considerations

Historic Environment Division: Historic Monuments (HED: HM) has reviewed this application and our records indicate that there are a number of Scheduled and State Care monuments close to the site. These are protected under the provisions of PPS6 Policy BH1.

HED: HM recommend that any subsequent EIA should have a Cultural Heritage section that includes:

1. A detailed assessment of the impact of the proposed development on the setting of the Scheduled and State Care monuments within the environs of the proposed application site. This should include a cumulative impact assessment that includes an assessment of the impact of this site along with similar wind farms and wind turbine sites nearby.

Informative

The Northern Ireland Sites and Monuments Record (NISMR) is available to consult online as is the Historic Environment Map Viewer.

<http://doeni.maps.arcgis.com/apps/webappviewer/index.html?id=f30dc61c86e44bb5bc19b5cacfe43cdc>

<https://www.communities-ni.gov.uk/services/sites-and-monuments-record>

Archaeology & Built Heritage

Section Reference: HB10 1072

Considerations

Historic Environment Division (HED) has been consulted to consider whether this application affects any listed buildings in the area that are of special architectural and historic interest as set out in Section 80 and is protected under the Planning Act (NI) 2011.

HED Historic Buildings has considered the potential effects of the proposal on any listed buildings and on the basis of the information provided advise:

- HED Historic Buildings has considered the information provided and advises the application may have limited effect **or** an impact on the setting of the listed buildings within the locality.
 - a) Should it be determined that an Environmental Impact Assessment (EIA) is required, Historic Buildings consider that a listed building section is not required in the Cultural Heritage/ Material Assets Chapter of the Environmental Statement;

HED Historic Monuments may have concerns with respect to archaeological issues and to the effects on Historic sites, Gardens and Demesnes etc and we defer to our colleagues on these issues.

Explanatory note

These comments are made in respect of the possible impact of the proposal against the requirements of the Strategic Planning Policy Statement for Northern Ireland (SPPS) and Policy BH11/Development affecting the Setting of a Listed Building of the Department's Planning Policy Statement 6: Planning, Archaeology and the Built Heritage.

The above comments are made to assess the impact of the proposal against the requirements of the Strategic Planning Policy Statement for Northern Ireland (SPPS) and Policy BH11 (Development affecting the Setting of a Listed Building) of the Department's Planning Policy Statement 6: Planning, Archaeology and the Built Heritage.

Informatives

Additional information/advice:

1. Strategic Planning Policy Statement for Northern Ireland (SPPS) – Planning for Sustainable Development.
2. Planning Policy Statement 6 – Planning, Archaeology and the Built Heritage.
3. BS 7913:2013, Guide to the conservation of Historic Buildings.
4. Consultation Guide: Required Environmental Information, A guide to supporting information required for effective consultations (Sections 10 and 16).
5. The following link will allow access to our Historic Environment Map viewer to enable determining the location of the historic structures:

<http://doeni.maps.arcgis.com/apps/webappviewer/index.html?id=f30dc61c86e44bb5bc19b5cacfe43cdc>

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<http://doeni.maps.arcgis.com/apps/webappviewer/index.html?id=f30dc61c86e44bb5bc19b5cacf43cdc>

Infrastructure Planning

Westland House
Old Westland Road
Belfast
BT41 6TE

Tel: 028 90354813 Ext 20646
www.niwater.com



Derry and Strabane
Local Planning Office
Orchard House
40 Foyle Street
Londonderry
BT48 6AT

Your Ref:
LA11/2016/1055/TBA
Our Ref:

Date: 30 January 2017

Dear Sir / Madam.

PLANNING CONSULTATION REFERENCE – LA11/2016/1055/TBA

Please note this proposed development will not conflict with any NI Water Infrastructure.

Yours faithfully

Alan Moore
Infrastructure Planning



DFI STRATEGIC PLANNING DIVISION
CLARENCE HOUSE
10-18-ADELAIDE STREET
BELFAST
BT2 8GB

Rivers Agency Planning Advisory Unit
44 Seagoe Industrial Estate
CRAIGAVON
Co. Armagh
BT63 5QE
Tel: 028 3839 9102

Your Ref: LA11/2016/1055/TBA
Our Ref: IN1-17-1125

27th January 2017

Re: Wind Farm - Carrickaduff & Meenbog, County Donegall - LA11/2016/1055/TBA

In response to your consultation dated 11th January 2017.

Paragraph 5.8 of PPS 15 requires that flood risk and drainage assessment are addressed in the Environmental Statement.

The Strategic Flood Map for Northern Ireland does not extend outside Northern Ireland.

Under the terms of Schedule 6 of the Drainage (NI) Order 1973 any proposal either temporary or permanent, in connection with the development which involves interference with any watercourse in Northern Ireland such as culverting, bridging, diversion, building adjacent to or discharge of storm water etc requires the written consent of Rivers Agency.

If you require any additional information or clarification please contact me at the above address quoting the reference number.

Yours faithfully,

A Bell

Planning Advisory Unit

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

27 January 2017

Dear Sir/Madam

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

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

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

The Department for Infrastructure (DfI) can be contacted for any available data gathered from any other local wind farm developments⁵. RSPB data can be requested using the link below⁶ where access to other data sources can also be found such as the National Biodiversity Network Gateway (NBN)⁷ and the British Trust for Ornithology (BTO)⁸ through our website.

¹ [NIEA](#)

² [NIRSG](#)

³ [Birds Directive](#)

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

⁵ [Homepage | Planning NI](#)

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

⁷ [National Biodiversity Network Gateway](#)

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

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

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

1. Survey/desktop study recommendations

Site Designations

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

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

Habitats

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

Methodologies

The RSPB is of the opinion that in order to satisfy Schedule 4 of the EIA Regulations, i.e. to describe the likely significant effects of the development proposal on the environment, the scoping report should give an indication of the survey methodologies that will be employed during the EIA process.

⁹ [Planning Regulations](#)

¹⁰ [Protected Areas](#)

¹¹ [The Conservation Regulations](#)

¹² [Priority habitats](#)

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

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

These methodologies will vary according to the species concerned, and the RSPB reserves the right to make further comments once the developer has set out suggested methodologies for each species. We can give further advice on this matter, if required. The scoping document should therefore affirm that the EIA will include a full bird survey carried out at appropriate times of the year, employing stated methodologies and using a reputable ecological contractor. The surveys should cover not only the development site but also areas near the site that may be affected, either directly or indirectly, by the development.

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

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

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

A transect CBC style survey will pick up records of most breeding waders. However, the B&S methodology can be used to identify breeding waders, where there is suitable habitat (i.e. in upland

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

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

areas). All reports, field maps and field forms should be retained, even after a development proposal has gained consent, and should be viewed as being in the public domain.

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

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

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

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

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

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

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

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

We expect these papers to be used to help quantify the potential level of disturbance and loss of species post-construction from proposed sites and therefore aid the choice of suitable sites and areas of land, on or off-site, for successful habitat management. It is particularly relevant if breeding waders¹⁸ are on or near to a proposed site and/or foraging hen harriers or buzzards are present.

¹⁷ [PPS18](#)

¹⁸ Such as snipe and curlew

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

2. Analysis

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

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

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

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

Indirect impacts may include:

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

3. Mitigation, enhancement and monitoring

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

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

- institution of agricultural management and access regimes which favour important bird species through habitat management and possibly habitat creation,
- time-related restrictions on construction in relation to nesting periods,

- precise location and orientation of built development within the development site, and
- removal of some tracks/roads after construction.

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

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

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

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

Yours sincerely

Assistant Conservation Officer
RSPB Northern Ireland

¹⁹ [Futurescapes](#)

PLANNING CONSULTATION REQUEST

Planning Application Number: LA11/2016/1055/TBA

Proposed Development: Wind Farm Development.

Location: Carrickaduff, Meenbog and adjacent townlands,
Co Donegal.

Date: 1st June 2017

Thank you for your consultation request dated 11th January 2017; please accept our apologies for the delay in responding.

Tourism NI (TNI) is a non-departmental public body of the Department for the Economy (DfE) and is responsible for the development of tourism and the marketing of Northern Ireland as a tourist destination to domestic tourists from within Northern Ireland, and to visitors from the Republic of Ireland. Whilst TNI is not a statutory consultee, in the past it did provide comment on planning applications requiring a tourism perspective, in order to assist planning officials to come to a determination on such matters.

In light of the transfer of powers to Local Authorities for planning applications within their council boundaries (from the then Department of the Environment); and to better align with TNI's role as a statutory partner in the Community Planning process, TNI has now revised its approach to consideration of planning matters.

TNI does not consider it appropriate to participate in Environmental Impact Assessment Scoping discussions (EIAs) connected with applications for major development. TNI recognises the role played by wind farms in generating renewable energy and reducing the carbon footprint, and acknowledges that care does need to be taken to ensure that insensitively sited wind farm developments do not negatively impact tourism potential. However, TNI considers that the judgement of acceptability based on landscape protection should provide adequate protection for tourism assets, and that the planning authority is best placed to determine on the implications of wind turbine development for tourism assets.

Furthermore, research to date in Northern Ireland indicates that the impact of wind farms on the tourism industry is inconclusive, in terms of whether they have a negative, neutral or positive influence on the decision of tourists to visit here.

Tourism NI has written to each Council Chief Executive, the Council Heads of Planning and the Department for Infrastructure to advise them of its position.