Construction and Environmental Management Plan

Proposed Meenbog Wind Farm
Development at Meenbog & Adjacent
Townlands, Co. Donegal



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Prepared By: McCarthy Keville O'Sullivan Ltd.

Planning & Environmental Consultants

Block 1, G.F.S.C.

Moneenageisha Road, Galway



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1 INTRODUCTION

This Construction and Environmental Management Plan (CEMP) has been developed by McCarthy Keville O' Sullivan Ltd. on behalf of Planree Ltd., who intend to apply to An Bord Pleanála for planning permission, as part of the Strategic Infrastructure Development process, to construct a wind energy development and all associated infrastructure. The CEMP has been prepared in conjunction with the Environmental Impact Assessment Report (EIAR) which will accompany the planning application for the proposed development to be submitted to An Bord Pleanála.

Should the project secure planning permission, the CEMP will be updated, in line with all conditions and obligations which apply to any grant of permission. The CEMP should be read in conjunction with the EIAR and planning drawings. The CEMP will also require updating by the selected contractor in order to identify, assess and satisfy the contract performance criteria as set out by the various stakeholders. The CEMP due to its structure and nature will also require constant updating and revision throughout the construction period as set out below. Therefore, this is a working document and will be developed further prior to and during construction.

Triggers for amendments to the CEMP will include:

- When there is a perceived need to improve performance in an area of environmental impact;
- As a result of changes in environmental legislation applicable and relevant to the project;
- Where the outcomes from auditing establish a need for change;
- Where Work Method Statements identify changes to a construction methodology to address high environmental risk; and
- As a result of an incident or complaint occurring that necessitates an amendment.

This report provides the environmental management framework to be adhered to during the pre-commencement, construction and operational phases of the proposed development and it incorporates the mitigating principles to ensure that the work is carried out in a way that minimises the potential for any environmental impacts to occur. This report has been prepared in accordance with the mitigation measures and commitments made in the EIAR and other planning documents for the development.

This CEMP identifies the key planning and environmental considerations that must be adhered to and delivered during site construction and operation. This report is intended as a single, amalgamated document that can be used during the future phases of the project, as a single consolidated point of reference relating to all construction, environmental and drainage requirements for the Planning Authority, developer and contractors alike.

1.1 Scope of Construction and Environmental Management Plan

This report is presented as a guidance document for the construction of the proposed Meenbog Wind Farm including connection to the national grid. Where the term 'site' is used in the CEMP it refers to all works associated with the wind farm development including the grid connection and enabling works. The CEMP outlines clearly the

mitigation measures and monitoring proposals that are required to be adhered to in order to complete the works in an appropriate manner.

The report is divided into nine sections, as outlined below.

- Section 1 provides a brief introduction as to the scope of the report
- Section 2 outlines the Site and Project details, detailing the targets and objectives of this plan along with providing an overview of construction methodologies that will be adopted throughout the project.
- Section 3 sets out details of the environmental controls on site which looks at noise and dust controls. Site drainage measures, peat stability monitoring measures and a waste management plan are also included in this section.
- Section 4 sets out a fully detailed implementation plan for the environmental management of the project outlining the roles and responsibilities of the project team.
- Section 5 outlines the Emergency Response Procedure to be adopted in the event of an emergency in terms of site health and safety and environmental protection
- Section 6 consists of a summary table of all mitigation proposals to be adhered to during the project, categorised into three separate headings, 1) precommencement measures; 2) construction-phase measures and 3) operational-phase measures.
- Section 7 consists of a summary table of all monitoring requirements and proposals to be adhered to during the project, categorised into three separate headings, 1) pre-commencement measures; 2) construction-phase measures and 3) operational-phase measures.
- Section 8 sets out a programme for the timing of the works.
- Section 9 outlines the proposals for reviewing compliance with the provisions of this report.

2 SITE AND PROJECT DETAILS

2.1 Site Location and Description

The site of the Proposed Development is located in the townlands of Meenbog and Croaghonagh and adjacent townlands associated with the underground electrical cabling, listed in Table 1.1 of the EIAR, in County Donegal. The Proposed Development will comprise of the provision of a total of 19 No. wind turbines, with a maximum ground to top blade tip height of up to 156.5m and all associated infrastructure.

The wind proposed farm site measures approximately 990 hectares or 2,446 acres. The Grid Reference co-ordinates for the approximate centre of the site are (E207,963 N385,970). The Proposed Development is located approximately eight kilometres south west of the towns of Ballybofey and Stranorlor and approximately 15 kilometres northwest of the town of Castlederg, Co. Tyrone.

The electrical connection from the Proposed Development to the national grid will be completed by underground cabling which will run within the public road corridor to the existing Clogher 110 kV Electricity Substation.

2.2 Description of the Development

During the construction phase of the project, civil works will include constructing the reinforced concrete foundations; access road construction and upgrade of existing access roads; construction of temporary compounds; construction of substation; upgrading existing watercourse crossings, construction of underground cabling; and a permanent meteorological mast.

The design life of the project is expected to be 30 years.

The key components of the wind farm include the following:

- 19 no. Wind Turbines with a maximum blade tip height of 156.5 metres;
- 19 no. Hardstand Areas to facilitate cranes for turbine erection and to act as construction material storage compounds;
- 1 no. Permanent Meteorological Mast;
- 1 no. 110kV Electricity substation and control building with 2 no. control buildings with welfare facilities, associated electrical plant and equipment, security fencing and waste water holding tank;
- 110kV underground grid connection cabling;
- Upgrade of access junctions;
- Upgrade of existing tracks, roads and provision of new site access roads and hardstand areas;
- 3 no. borrow pits;
- 2 no. temporary construction compounds;
- Recreation and amenity works, including marked trails (upgrade of existing tracks and provision of new tracks), picnic, amenity and play areas, car parking and vehicular access:
- Site drainage
- Forestry felling
- Permanent signage;
- All associated site development and ancillary works

The proposed site layout showing individual elements of the development is shown in Figure 2.1 and in the Site Layout Drawings included with the application.

2.3 Targets and Objectives

In so far as they have been completed to date, or are to be further completed in future, the construction phase works are designed to approved standards, which include specified materials, standards, specifications and codes of practice. The design of the project has considered environmental issues and this is enhanced by the works proposals.

The key site targets are as follows;

- Adopt a sustainable approach to construction and, ensure sustainable sources for materials supply where possible;
- Keeping all watercourses free from obstruction and debris;
- Avoidance of any pollution incident or near miss as a result of working around or close to existing watercourses and having emergency measures in place;
- Correct fuel storage and refuelling procedures to be followed;
- Air and noise pollution prevention to be implemented;
- Construction Methods and designs will be altered where it is found there is an adverse effect on the environment;
- Good waste management and house-keeping to be implemented;
- Using recycled materials if possible, e.g. excavated stone, soil and subsoil material;
- Avoidance of vandalism;
- Monitoring of the works and any adverse effects that it may have on the environment and,
- Provide adequate environmental training and awareness for all project personnel.

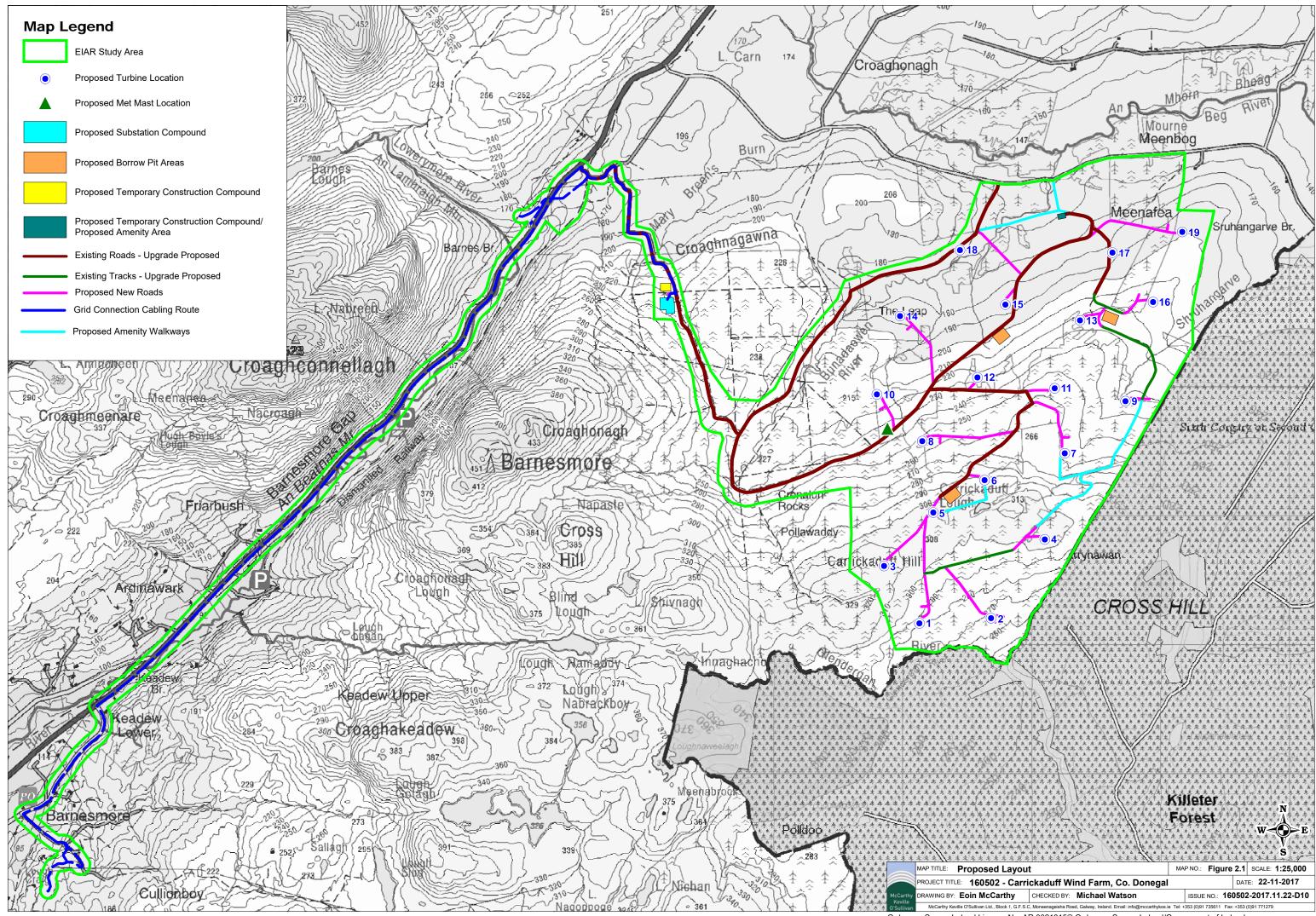
The key site objectives are as follows;

- Keep impact of construction to a minimum on the local environment, watercourses and wildlife;
- Comply with all relevant water quality legislation;
- Ensure construction works and activities are completed in accordance with mitigation and best practice approach presented in the Environmental Report and associated planning documentation;
- Ensure construction works and activities are completed in accordance with any planning conditions for the development;
- Ensure construction works and activities have minimal impact/disturbance to local landowners and the local community;
- Ensure construction works and activities have minimal impact on the Natural Environment;

2.4 Construction Methodologies Overview

2.4.1 Introduction

An experienced main contractor will be appointed for the civil works for the construction phase of the Proposed Development. The appointed contractor for the works will be required to comply with this CEMP and any revisions made to this document in the preparation of method statements for the various elements of the



construction phase of the proposed development. An overview of the proposed Construction Methodologies is provided below.

2.4.2 Overview of Proposed Construction Methodology

The proposed anticipated construction methodology is summarised under the following main headings:

- Temporary Construction Compounds;
- Borrow Pits:
- Site Drainage;
- Upgrade of Existing Roads;
- Proposed new Site Access Roads;
- Crane Hardstands;
- Turbine and Anemometry Mast Foundations;
- Electricity Substation and Control Buildings;
- Peat Repositories (cells within borrow pits);
- Cable Trenching;
- Grid Connection Cabling; and,
- Recreation and Amenity Areas

2.4.2.1 Temporary Construction Compound

There are two temporary construction compounds proposed for the site. One will be located in the northwest of the site, just north of the proposed substation location. The second temporary construction compound is located north of the site, northwest of Turbine no. 17 which will become an amenity area on completion on the construction of the wind farm. The location of the construction compound is shown on the site layout drawings in Figure 2.1. The compound will typically be constructed as follows:

- The area to be used as the compound will be marked out at the corners using ranging rods or timber posts. Drainage runs and associated settlement ponds (refer to Section 3.1.1 below) will be installed around the perimeter;
- The compound will be established using a similar technique as the construction of the excavated site tracks as discussed below;
- Where required, a layer of geogrid will be installed and compacted layers of well graded granular material will be spread and lightly compacted to provide a hard area for site offices and storage containers;
- Areas within the compound will be constructed as site roads and used as vehicle hardstandings during deliveries and for parking;
- A bunded containment area will be provided within the compound for the storage of lubricants, oils and site generators etc.;
- If necessary the compound will be fenced and secured with locked gates, although fencing would only be utilised where significant risk of danger to third parties or vandalism is envisaged; and,
- Upon completion of the project the compound will be decommissioned by backfilling the area with the material arising during excavation, landscaping with topsoil as required. (North-eastern compound will be repurposed as an amenity area as described in Section 4.6 of the EIAR)
- During the construction phase, a self-contained port-a-loo with an integrated waste holding tank will be used on site for toilet facilities. This will be maintained by the service contractor as required and will be removed from the site on completion of the construction phase.
- The water supply to the site will be from a temporary water storage tank which will be filled using a mobile water tank which will source water locally as required.

2.4.2.2 Borrow Pit

The development will comprise three borrows pits one of which is proposed for the southern section of the site, north of turbine no. 5. The other borrow pits are located in north of the site, south of turbine no. 15 and east of turbine no. 13 as shown in Figure 2.1. The borrow pits will typically be excavated as follows:

- The areas to be used for both borrow pit will be marked out at the corners using ranging rods or timber posts. Drainage runs and associated settlement ponds will be installed around the perimeter;
- The initial borrow pit excavation will involve removal of peat and overburden from the top of bedrock. These materials will be used to form a berm on the downhill side of the borrow pit to provide screening of the borrow pit operations;
- Interceptor drainage ditches will be excavated on all sides of the borrow pit to catch surface water runoff, and direct it to downstream re-distribution locations;
- The bedrock material will be extracted from the borrow pit and stockpiled or used as required;
- The use of material won from the borrow pit will be sequential with new road construction or turbine base formations;
- Temporary stockpiling of aggregates will be required to accommodate the cut and fill operations within the borrow pit, and the progression of access roads and turbine excavations;
- As the borrow pit excavations progress and become deeper, surface water and groundwater ingress will be removed via pumping to settlement ponds, and re-distribution locally across natural vegetated areas. Where required, additional specialist treatment will be employed to ensure no deterioration in downstream water quality occurs;
- When extraction ceases within the borrow pit, the uphill face of the rock will be stepped and deposits of soil will be placed which will assist in the revegetation of the rock face.
- The extraction area of the borrow pit will have to be permanently secured and a stock-proof fence will be erected around the borrow pit to prevent access to these areas as well as the installation of appropriate health and safety signage.

Once the required volume of rock has been extracted from the borrow pit areas, it is intended to reinstate these areas with peat and overburden excavated from the works areas of the Proposed Development. The total estimated volume of peat and spoil to be excavated and managed during the construction phase of the proposed development is 330,820m³. The borrow pit areas, within the site of the proposed development will undergo restoration with this peat and spoil material after all rock has been excavated from the borrow pit. The volume of excavated peat and overburden will be managed as outlined below:

- Excavators will remove the peat from the permanent development footprint areas i.e. excavated roads, hardstanding areas and turbine foundation areas.
- Temporary, sealed stockpiling areas, located adjacent to the hardstanding areas and turbine foundation areas, will be chosen following onsite discussions between the construction site manager, an ecologist, a geotechnical engineer and hydrologist.
- The excavators will move the excavated peat to the designated temporary stockpiling areas within the construction and soft levelled areas.
- The temporary stockpiling areas will be surrounded by silt fences to ensure sediment-laden run-off does not occur.

- The excavated peat will remain in these areas over a period of time until the volume of the peat has reduced as the water drains out of the mounded peat.
- The excavators will then load the peat directly into dump trucks, to transport the peat to the nearest borrow pit area.
- The material will be backfilled into the borrow areas and will be spread evenly across the area.
- The peat and subsoil will also as part of landscaping and reinstatement along access roads and turbine excavations.

This method of managing the volume of surplus peat and other overburden material will ensure that no excavated material will be left on-site, or stockpiled adjacent to access roads and turbine locations, following the completion of the construction works.

2.4.2.3 Drainage System

The early establishment of temporary drainage facilities will manage the risk of impacts on watercourses on and adjacent to the site during construction. In addition, construction operations will adopt best working practices. The development of the site will need to be phased accordingly. The construction of the drainage will start from the downstream sections and progress upstream, connecting conveyance systems with other drainage features as each development phase progresses. They will therefore need to be designed with sufficient flexibility to respond to an early phase incoming flow during the construction phase.

Surface drainage design and management is summarised with in Section 3.2 below.

2.4.2.4 Upgrade of Existing Roads

It is proposed to utilise the existing road network as much as possible (approximately 14.5 km will be used). These roads will require upgrading which will entail widening of the roadway to a total running width of approximately six metres, with wider sections at corners and on the approaches to turbine locations, and the laying of a new surface dressing on the existing section of roadway where necessary. The road widening will be undertaken as follows:

- If it is considered that the current road formation level is adequate to support required bearing, then no upgrade or widening works will be completed;
- Otherwise, where required, the subsoil in the existing road verge will be excavated down to a suitable formation layer and the spoil used for the restoration of borrow pits or in reinstatement areas;
- Well-graded imported granular fill will be spread and compacted in layers with an overall thickness of up to 300mm to provide a homogeneous running surface. The thickness of layers and amount of compaction required will be decided by the Construction Manager based on the characteristics of the material and the compaction plant to be used. These layers of granular fill will be brought to the same level as the top of the existing road surface;
- A layer of geogrid will be installed directly onto the top of the granular fill layer and the existing road surface where required; and,
- A layer of finer well graded stone for the running surface will be laid on the geogrid and compacted.
- Prior to any works commencing on the upgrade of existing roads, the requirement for additional roadside drainage will be considered by the Project Hydrologist in line with the proposals outlined in Section 4
- Where road widening is required in an area where the peat depth is greater than c1.5m, it will be necessary to complete the road upgrade using a floating road methodology as summarised in the section that follows.

2.4.2.5 New Site Access Roads

There is approximately 7.7 km of new access roads to be installed at the site. In a number of areas across the site, floating roads will be required where peat depths exceed c1.5m. Floating roads will be constructed using either a lightweight construction methodology which includes the use of layers of brash and lumber either side of a geogrid membrane where required and capped with suitable stone material or the use of geogrid capped with a stone material. The new access roads will be constructed as follows:

- Establish alignment of the new site roads from the construction drawings and mark out the centrelines with ranging rods or timber posts;
- The road layout has been designed to avoid crossings of natural watercourses where possible;
- Where existing culverts are to be upgraded or extended, the works will be carried out to follow a method statement to be agreed with Inland Fisheries Ireland
- The access tracks will be of single-track design with an overall width of 6m. There will be some local widening on the bends, junctions and around turbine bases for the safe passage of large vehicles;
- Any excavated road section's will, where it is considered beneficial have turf stripped over the area of the excavation and stored growing side up for reuse. This area will be oversized to facilitate the excavated subsoil material. The subsoil material will subsequently be capped with topsoil to form an earth bund around the excavated material;

- Where the Geotechnical Engineer confirms it is more suitable, a non-excavated ground bearing road will be employed. In this case a reinforced sub-base will be placed directly on the existing ground using geotextile separation layer and layers of geogrid reinforcing as designed by the Geotechnical Engineer to achieve the bearing capacity required for the road running surface.
- All peat excavated will be used as part of the borrow pit restoration or in reinstatement areas. Topsoil will be temporarily stockpiled locally for reuse for landscaping the backfill placed above the foundations. A bund constructed of the excavated subsoil covered with a layer of Geogrid and capped with the peat topsoil for landscaping purposes will form the down-gradient boundary to the reinstatement areas;
- The subsoil will be excavated down to a suitable formation layer of either firm clay or bedrock;
- Where floating roads are to be constructed, the subsoil will not be excavated but a layer of geo-grid or layers of brash and lumber will be laid directly on to the peat surface.
- Well-graded granular fill will be spread and compacted in layers with an overall thickness of up to 750mm and a suitable capping layer to provide a homogeneous running surface. The thickness of layers and amount of compaction required will be decided by the Construction Manager based on the characteristics of the material and the compaction plant to be used;
- All new roadways will be constructed with a camber to aid drainage of surface water;
- Batters will generally be sloped to between 1:1 and 1:2 (depending on depth and type of material) and will be left as cut to re-vegetate naturally with local species. Design slopes will be informed by the Geotechnical Engineer;
- At bends or steep inclines from the roads, reflective snow poles will be erected
 to warn traffic on dark mornings and evenings that there is a turn in the road
 or a sharp incline beyond the site road.
- The granular fill use to complete the final running surface of the roads on site will be tested to BS812-111:1990 "Ten percent fines value".

2.4.2.6 Watercourse/Culvert Crossing on the Wind Farm Site

A survey of all existing stream culverts and proposed stream crossings along existing roads (for upgrade) and proposed access roads was undertaken as part of the drainage mapping There are a total of 19 no. existing watercourse crossings and 5 no. proposed new watercourse crossings. The locations of existing and proposed crossings are shown on Figure 9.9 of the EIAR. The minimum required culvert dimensions of proposed culverts are shown in Appendix 9.2 of the EIAR which has informed the selection of both piped culvert and clear span bridge methodologies for the watercourse crossings.

It is proposed to construct c. 5m wide clear-span bridge over the Bunadaowen River within the Proposed Development site to provide access to Turbine No. 18 in the eastern half of the site. The crossing will comprise a pre-cast concrete clear span bridge as shown in Figure 4.34 of the EIAR.

The typical construction methodology for the installation of a pre-cast concrete clear-span bridge is presented below:

 The access road on the approach to the watercourse will be completed to a formation level which is suitable for the passing of plant and equipment required for the installation of the watercourse crossing.

- All drainage measures along the proposed road will be installed in advance of the works.
- The abutment will consist of concrete panels which will be installed on a concrete lean mix foundation to provide a suitable base. The base will be excavated to rock or competent ground with a mechanical excavator with the foundation formed in-situ using a semi-dry concrete lean mix. The base will be excavated along the stream bank with no instream works required.
- Access to the opposite side of the river for excavation and foundation installation will require the installation of pre-cast concrete slab across the river to provide temporary access for the excavator.
- All pre-cast concrete panels and slabs/beams will be installed using a crane
 which will be set up on the southern side of the stream and will be lifted into
 place from the stream back with no contact with the watercourse.
- A concrete deck will be poured over the beams/slabs which span across the river. This will be shuttered, sealed and water tested before concrete pouring can commence. The deck will be leak tested before concrete pouring can commence.
- Once the culvert is in position stone backfill will be placed and compacted against the culvert up to the required level above the foundations.

When the concrete beams are cured the filling and compaction of the road will be completed. The road finish level will be decided by the Project Engineer.

At the proposed new crossing will be completed using piped culvert, the crossing will be installed as follows:

- The access road on the approach watercourse will be completed to a formation level which is suitable for the passing of plant and equipment required for the installation of the watercourse crossing.
- The installation of the culvert will take place in low flow conditions.
- Where a flow exists, the water running through the watercourse channel will be pumped around the water crossing location and back into the watercourse channel downstream of the works area.
- Where over pumping is required, measures will be taken to ensure that the pumped water discharge does not disturb the stream bed with the force of water from the discharge. A steel plate to reduce the force of the flow will be used where appropriate.
- The project engineer will determine the required gradient of the culvert. The pipe must be laid at a gradient that will ensure water is contained within the pipe at all times. Where necessary a rock armour dam will be installed within the stream to reduce flow and ensure an acceptable depth of water remains within the pipe. Where a gradient of 1 1.5% is identified, the use of a baffle has been recommended.
- The bed of the watercourse channel will be excavated, if necessary, to achieve the correct line and to allow the pipe to be embedded 300mm into the base of the existing drain.
- The embedded section will be allowed to fill naturally with existing material within the base of the drain or with suitable drainage material such as gravel or round shingle where deemed applicable.
- The culvert will be lowered into place using an excavator with a lifting mechanism.

- Large stone boulders (approx. 400mm), sourced from the on-site borrow pits, will be placed over the culvert to create a headwall for the culvert and a suitable sub-base for road construction.
- Smaller 50mm stone, sourced on site will be placed upon the sub-base to construct the road over the water crossing.

Any watercourse crossings required will be installed outside of the salmonid spawning season, October to June in any year, in accordance with Inland Fisheries Ireland best practice (IFI, 2016). This will ensure no potential impacts on salmonid spawning habitat.

All of the above works will be supervised by the Environmental Clerk of Works and the project hydrologist.

2.4.2.7 Crane Hardstands

All crane pads will be designed taking account of the loadings provided by the turbine manufacturer and will consist of a compacted stone structure. The crane hardstands will be constructed in a similar manner to the excavated site roads and will measure approximately to the turbine manufacturer's requirements. Where an excavated crane hardstand cannot be used due to the depth of peat, the hardstand will be supported by using reinforced concrete piles as per the methodology outlined for piled foundations summarised below. The position of the crane pads varies between turbine locations depending on topography, position of the site access road, and the turbine position.

2.4.2.8 Turbine and Anemometry Mast Foundations

The wind turbines and anemometry mast foundations will be a reinforced concrete base designed to Eurocode 2/BS8110. Foundation loads will be provided by wind turbine and mast supplier, and factors of safety will be applied to these in accordance with European design regulations. The turbine will be anchored to the foundation using a bolt assembly which shall be cast into the concrete. The anemometry mast is a free-standing structure which is also anchored to the reinforced concrete foundation. It is anticipated that the foundations for both the turbines and the anemometry mast will be either ground bearing or piled foundations and that the formation level of the turbine foundations will be on the lower mineral subsoil or bedrock. Bases will measure approximately 20 metres in diameter. They will likely be formed one metre below the base of the peat layer on stiff subsoil material or bedrock, or at a suitable level directed by the Geotechnical Engineer/Designer. The foundations will be constructed as follows:

- The extent of the excavation will be marked out and will include an allowance for trimming the sides of the excavation to provide a safe working area and slope batter;
- Where practical, the peat will be stripped over the area of the excavation and stored growing side up for reuse, the subsoil will be excavated and stored to one side for reuse during the landscaping around the finished turbine;
- No material will be removed from site and storage areas will be stripped of vegetation prior to stockpiling in line with best working practices;
- All groundwater and surface water arising from turbine base excavation will be pumped to the dirty water system prior to discharge from the works area;
- Soil excavation shall be observed by a qualified archaeologist in accordance with a scheme of archaeological monitoring to identify any significant remains as they come to light and,
- The foundations excavation will be raised to formation level by compacted layers of well graded granular material will be spread and compacted to provide a hard area for the turbine foundation.

Standard excavated reinforced concrete bases will be completed as follows:

- A layer of concrete blinding will be laid approximately 75mm thick directly on top of the newly exposed formation, tamped and finished with a screed board to leave a flat level surface. The concrete should be protected from rainfall during curing and all surface water runoff from the curing concrete should be prevented from entering surface water drainage directly;
- High tensile steel reinforcement will be fixed in accordance with the designer's drawings & schedules. The foundation anchorage system will be installed, levelled and secured to the blinding using steel box section stools;
- Ductwork will be installed as required, and formwork erected around the steel cage and propped from the backside as required;
- The foundation anchorage system will be checked both for level and line prior to the concrete being installed in the base. These checks will be passed to turbine manufacturer for their approval;
- Concrete will be placed using a concrete pump and compacted when in the forms using vibrating pokers to the levels and profile indicated on the drawings. Upon completion of the concreting works the foundation base will be covered and allowed to cure;
- Steel shutters will be used to pour the circular chimney section;
- Earth wires will be placed around the base; and,
- The foundation will be backfilled with a cohesive material, where possible using the material arising during the excavation and landscaped using the vegetable soil set aside during the excavation.
- Soil, rock and other materials excavated during construction shall not be left stockpiled on site following completion of works. Excavated areas shall be appropriately restored within three months of the date of commissioning of the wind farm

Reinforced concrete piled foundations will be completed as follows:

- The extent of the excavation will be marked out and will include an allowance for trimming the sides of the excavation to provide a safe working area and slope batter;
- No material will be removed from site and placement areas will be stripped of vegetation prior to stockpiling in line with best working practices;
- A piling platform for the piling rig will be constructed. This can be done in two ways depending on the bearing capacity of the underlying soil.
 - The first method is to lay geo-textile on the existing surface and a stone layer will then be placed on top of the geo-textile by an excavator and compacted in order to give the platform sufficient bearing capacity for the piling rig.
 - o The second method is to excavate the soils to a suitable intermediate mineral subsoil and backfill to the formation level.
- The piling rig, fitted with an auger, will then bore through the soft material with a sleeve fitted around the auger to prevent the sidewalls of the peat from collapsing. The borehole is then extended to a suitable depth into the subsoil/bedrock.
- When the auger and the sleeve are removed high tensile steel cages will be lowered into the boreholes. These steel cages will extrude above the level of the top of the concrete pile.
- As the auger is removed concrete is pumped into the borehole.
- Reinforcing steel on the top of the pile will tie to the foundation base steel.

The procedure for standard excavated reinforced concrete bases as outlined above can be applied form here.

2.4.2.9 Electricity Substation and Control Buildings

The electricity substation and control buildings will be constructed within the site, adjacent to the existing access road, as shown in Figure 2.1. The dimensions of the substation area will be set to meet the requirements and specifications of ESB/Eirgrid and the necessary equipment to safely and efficiently operate the wind farm; The substation will be constructed by the following methodology:

- The area of the substation will be marked out using ranging rods or wooden posts and the soil stripped and removed to a temporary placement area for later use in landscaping. No material will be removed from site and the temporary placement areas will be stripped of vegetation prior to stockpiling in line with best working practises;
- Wind farm control buildings will also be built within the substation compound;
- All groundwater and surface water arising from turbine base excavation will be pumped to the dirty water system and treated in settlement ponds, and/or specialist treatment systems, prior to discharge from site; and,
- The foundations will be excavated down to the level indicated by the project engineer. The foundations will be shuttered and poured with reinforced concrete. An anti-bleeding admixture will be included in the concrete mix;
- The substation will be constructed with masonry blockwork. The block work
 walls will be built up from the footings to DPC level and the floor slab
 constructed, having first located any ducts or trenches required by the follow
 on mechanical and electrical contractors;
- The block work will then be raised to wall plate level and the gables & internal partition walls formed. Scaffold will be erected around the outside of the building for this operation;
- Concrete roof slabs will be lifted into position using an adequately sized mobile crane;
- The timber roof trusses will then be lifted into position using a telescopic load all or mobile crane depending on site conditions. The roof trusses will then be felted, battened, tiled and sealed against the weather.
- A rainwater harvesting system will be installed to provide the small volume of water required for the operation of the proposed substation and control building.
- The electrical equipment will be installed and commissioned.
- Perimeter fencing will be erected around the substation and control building compound area.
- All wastewater from the staff welfare facilities in the control buildings by means of a sealed storage tank which will be fitted with an automated alarm system that will provide sufficient notice that the tank requires emptying.

2.4.2.10 Cable Trenching

The transformer in each turbine is connected to the substation through a network of buried electrical cables. The ground is trenched typically using a mechanical excavator. The top layer of soil is removed and saved so that it is replaced on completion. The cables are bedded with suitable material unless the ground conditions are such that no bedding is required. The cables will be laid at a depth that meets all national and international requirements, and will generally be approximately 1.3m below ground level; a suitable marking tape is installed between the cables and the surface. On completion, the ground will be reinstated as previously described above.

The route of the cable ducts will follow the access track to each turbine location, and are visible on the site layout drawings included as Appendix 4.1 of the EIAR.

A method statement for all internal cabling works will be prepared by the appointed contractor prior to the commencement of any construction

2.4.2.11 Grid Connection

A connection to the national electricity grid will be made by underground electricity cabling originating from the proposed Meenbog Wind Farm substation and will run south connecting to the existing electricity Clogher 110kV electricity substation. The installation methodology for the underground electrical cable is summarised in the following sections.

2.4.2.11.1 Parallel Road Excavations inroad & in Grass margin

The grid connection route generally follows the existing road corridor except for a section of approximately 300m southeast of the N15 and 230m northwest of the N15 that will cross cut over bog, grassland and scrub habitats to facilitate directional drilling, under the N15 and a tributary of the Lowerymore River. The grid connection cabling is summarised as follows:

- The area where excavations are planned will be surveyed and all existing services will be identified.
- All relevant bodies i.e. ESB, Donegal County Council etc. will be contacted and all drawings for all existing services sought.
- A traffic management plan for the grid connection cabling works will be prepared in advance of any works commencing.
- A road opening licence will be obtained where required and all plant operators and general operatives will be inducted and informed as to the location of any services.
- Excavation permit will be completed and all plant operators and general operatives will be inducted and informed as to the location of any services.
- A 13 tonne rubber tracked 360-degree excavator will be used to excavate the trench to the dimensions specified in the ESB Networks manuals. The 110kV trench material build-up is designed to the "Functional Specification for the Installation of Ducts and Ancillary Structures for 110kV Underground Power Cables and Associated Communications Cables for Contestable Projects" No. 18150. The 20kV trench material build-up is designed to comply with the "Functional Specification for the Installation of Ducts and Ancillary Structures for 20kV Underground Power Cables and Associated Communications Cables for Contestable Projects" No.18152.
- All excavated material not used for backfilling will be removed to the on-site borrow pit areas or to an approved tip or if suitable stock piled and reused where appropriate.
- The trench depth is specified at 1220mm and trench support will not be required, however where depths exceed 1250mm trench support will be installed or the trench sides will be benched or battered back where appropriate.
- Any ingress of ground water will be removed from the trench using submersible pumps.
- A silt filtration system will be used to prevent contamination of any watercourse.
- Once the trench has been excavated a base layer of 15 N CBM4 concrete will be installed and compacted. All concrete will be offloaded directly from the concrete truck directly into the trench.

- Ducting will then be placed in the trench as per specification, approved cable ties will be used where required to secure the trefoil ducts together (at 3 meter centres).
- Once the trefoil ducts have been installed couplers will be fitted and capped to prevent any dirt etc. entering the duct. In poor ground conditions, the end of the trefoil ducts will be shimmed up off of the bed of the trench to prevent any possible ingress of water dirt. The shims will be removed again once the next length has been connected.
- Extreme care will be taken to ensure that all duct collars (both ends) are clean and in good condition prior to ducts being joined.
- The as built location of the ducting will be surveyed using a total station/GPS.
- 15 N CBM4 concrete will be carefully installed so as not to displace the ducting to the underside of the communications duct and compacted as per approved detail. See Plate 2.1.
- Spacers will be used to ensure that the correct cover is achieved at both sides of the trefoil ducting.
- ESB marker board will be fitted above the trefoil ducting.
- The Communication duct will be fitted and kept to one side of the trench ensuring that the minimum cover is achieved and 15N CBM4 concrete will be placed to the specified cover and compacted, see Plate 2.1.
- ESB red marker board will be installed and the remainder of trench will be backfilled in two compacted layers with approved material (lean mix concrete/clause 804).
- Yellow marker tape will be installed as per approved detail specifications, 300 mm maximum below finished road/ground level.
- The finished surface will be reinstated as per original specification or to the requirements of the land owner/Local Authority as appropriate.
- Marker Posts will denote all changes of direction, road crossings, etc.





Plate 2.1 Cable Trench View

2.4.2.11.2 Existing Underground Services

Any underground services encountered along the route will be surveyed for level and the ducting will pass over the service provided adequate cover is available. A minimum clearance of 300mm will be required between the bottom of the ducts and the service

in question. If the clearance cannot be achieved the ducting will pass under the service and again 300 mm clearance between the top of the communications duct and bottom of the service will be achieved. In deeper excavations, an additional layer of marker tape will be installed between the communications layer and yellow top level marker tape. If the required separation distances cannot be achieved then a number of alternative options are available such as using steel plates laid across the width of the trench and using 35N concrete surrounding the ESB ducts where adjacent services are within 600mm, with marker tape on the side of the trench. Back fill around any utility services will be with dead sand/pea shingle where appropriate. All excavations will be kept within the roadway boundaries, i.e. in road or grass margin.

2.4.2.11.3 Joint Bays

Joint bays are pre-cast concrete chambers where lengths of cable ducting will be connected. They will be located at various points along the ducting route approximately every 600-1000 meters. Where possible joint bays will be located in areas where there is a natural widening/wide grass margin on the road in order to accommodate easier construction, cable installation and create less traffic congestion. During construction, the joint bay locations will be completely fenced off and will be incorporated into the traffic management system. Once they have been constructed they will be backfilled temporarily until cables are being installed.

2.4.2.11.4 Watercourse/Culvert Crossing - Grid Connection Cable Route

The underground cable route crosses a number of minor culverts throughout its length and 3 no. bridge crossings. The construction methodology has been designed to eliminate the requirement for in-stream works. A general description of the various construction methods employed at culvert and bridge crossings are described in the following paragraphs below. A list of the bridge crossings and the proposed crossing method at each location is provided in Table 2.1 below. The crossing methodologies employed at the remaining 25 No. culvert crossings, along the grid connection cable route, will be selected from the suite of watercourse crossing options outlined below, as appropriate, depending on culvert type, depth, size and local ground conditions.

The bridge crossing locations are shown in Figure 2.2. The culvert crossing and bridge crossing locations are also shown on the underground cable route drawings included as Appendix 4.1 of the EIAR.

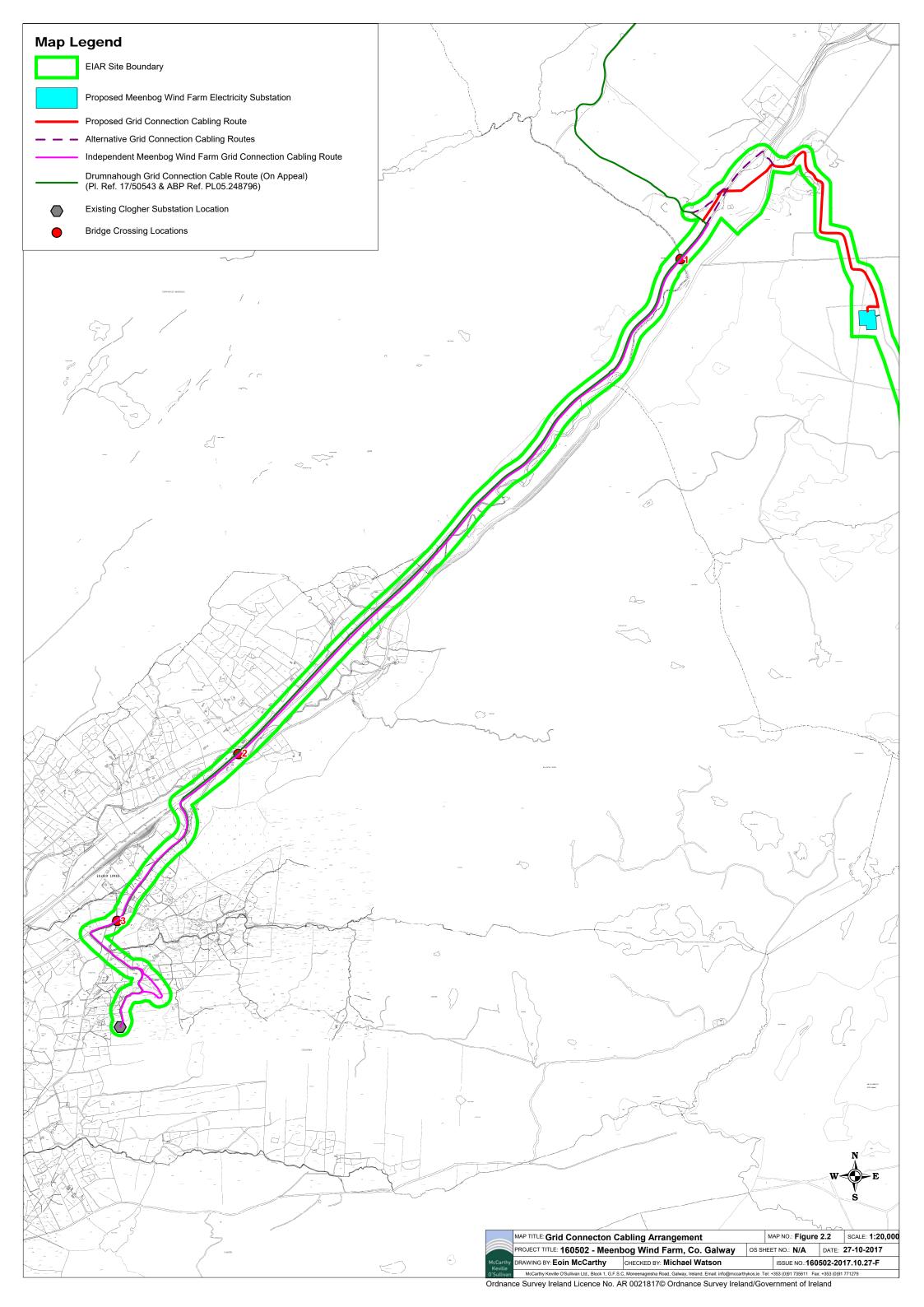
Piped Culvert Crossings over Culvert - Option 1

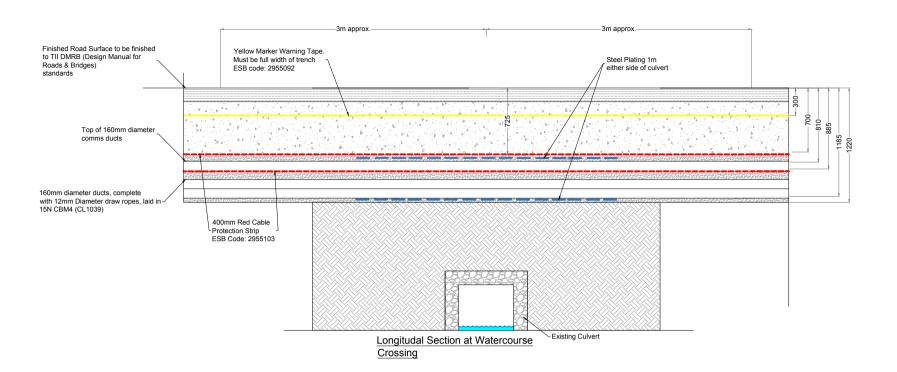
Watercourses will not be directly impacted upon since no instream works or bridge/culvert alterations are proposed. Where sufficient cover exists above the culvert, the trench will be excavated above the culvert and the ducts will be installed in the trefoil arrangement passing over the sealed pipe where no contact will be made with the watercourse. This method of duct installation is further detailed in Figure 2.3

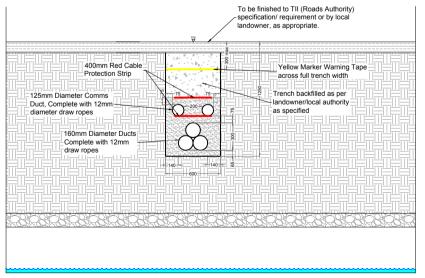
Piped Culvert Crossings under Culvert - Option 2

Watercourses will not be directly impacted upon since no instream works or bridge/culvert alterations are planned. Where the culvert consists of a socketed concrete or sealed plastic pipe, a trench will then be excavated beneath the culvert and cable ducts will be passed under the sealed pipe as outlined in Figure 2.4.

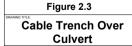
If this duct installation method cannot be achieved due to the invert level of the existing culvert or due to the composition of the culvert e.g. stone culverts, the ducts will be installed by alternative means as set out in the following sections.







Cross Section at Watercourse Crossing

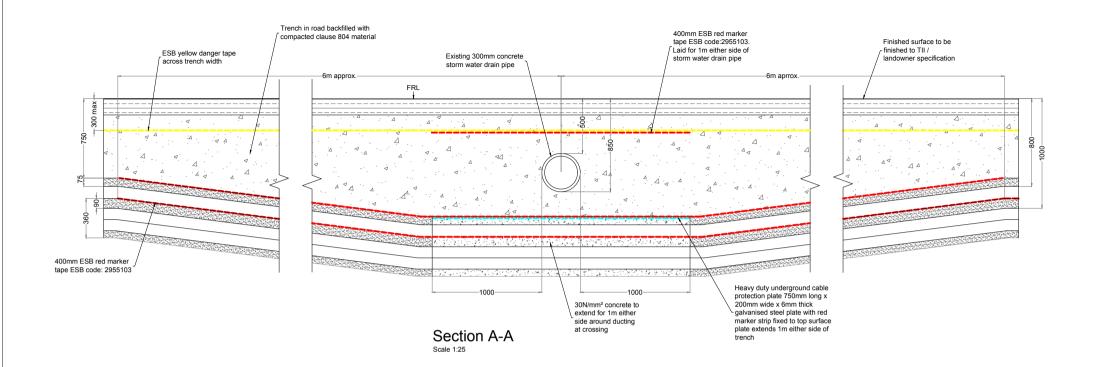


Meenbog Wind Farm, Co. Donegal

Joseph O Brien	Michael Watse
PROJECT No.: 160502	0502 - 53
1:30 @ A3	28.11.2017



McCarthy Keville O'Sullivan Ltd. Planning & Environmental Consultants Block 1, Galway Financial Services Centre, Monoenageisha Road, Galway, Ireland.
email: info@mccarthykos.ie
rel: v353 91 736811
Fax: v353 91 777279



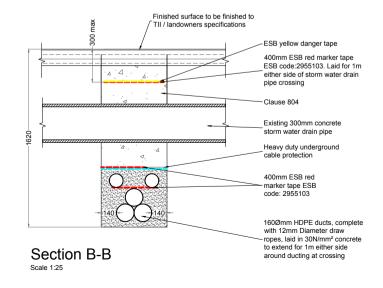


Figure 2.4 Cable Trench Under Piped Culvert

Meenbog Wind Farm, Co. Donegal

Joseph O Brien	Michael Watso
PROJECT No.: 160502	0502 - 54
1:25 @ A3	28.11.2017



Flatbed Formation over Culverts or at Road Level - Option 3

Where cable ducts are to be installed over an existing culvert where sufficient cover cannot be achieved by installing the ducts in a trefoil arrangement, the ducts will be laid in a much shallower trench the depth of which will be determined by the location of the top of the culvert. The ducts will be laid in this trench in a flatbed formation over the existing culvert and will be incased in 6mm thick steel galvanized plate with a 30N concrete surround as per ESB Networks specification. This method of duct installation is further detailed in Figure 2.5.

Where a bridge or culvert has insufficient deck cover to fully accommodate the required ducts, the ducts can be laid in a flatbed formation partially within the existing road surface. Where this option is to be employed, the ducts will also be incased in steel with a concrete surround as per Eirgrid and/or ESB Networks specifications. In order to achieve cover over these ducts and restore the carriageway of the road, it may be necessary to locally raise the pavement level to fully cover the ducts. The increase road level will be achieved by overlaying the existing pavement with a new wearing course as required. Any addition of a new pavement will be tied back into the existing road pavement at grade. After the crossing over the culvert has been achieved, the ducts will resume to the trefoil arrangement within a standard trench. This method of duct installation is further detailed in Figure 2.6.

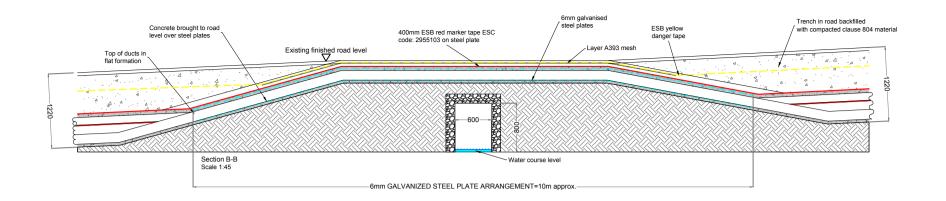
The flatbed formation methodology will also be used at bridge structures where there is an existing footpath. The cables will be installed in the same flatbed arrangement where the existing footpath will be excavated to allow for the installation of the cables. The footpath will be reinstated after cable ducts have been installed. Where there is no existing footpath, it is proposed to install a footpath to encase the cable ducts after they have been laid in the flatbed formation.

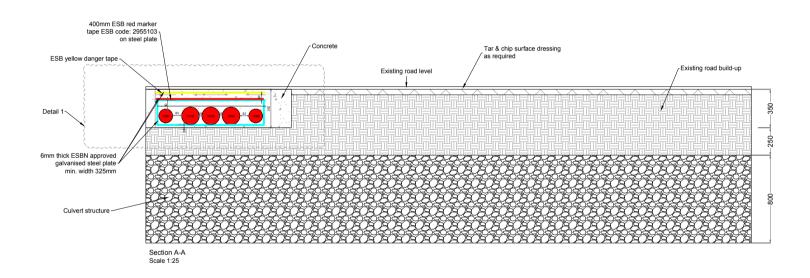
Directional Drilling - Option 4

In the event that none of the above methods are appropriate, directional drilling will be utilised.

The directional drilling method of duct installation will be carried out using Vermeer D36 x 50 Directional Drill (approximately 22 tonnes), or similar plant, will be utilised for the horizontal directional drilling at watercourse/culvert crossings listed above. The launch and reception pits will be approximately $0.55 \, \mathrm{m}$ wide, $2.5 \, \mathrm{m}$ long and $1.5 \, \mathrm{m}$ deep. The pits will be excavated with a suitably sized excavator. The drilling rig will be securely anchored to the ground by means of anchor pins which will be attached to the front of the machine. The drill head will then be secured to the first drill rod and the operator shall commence to drill into the launch pit to a suitable angle which will enable him to obtain the depths and pitch required to the line and level of the required profile. Drilling of the pilot bore shall continue with the addition of $3.0 \, \mathrm{m}$ long drill rods, mechanically loaded and connected into position.

During the drilling process, a mixture of a natural, inert and fully biodegradable drilling fluid such as $Clear\ Bore^{TM}$ and water is pumped through the centre of the drill rods to the reamer head and is forced in to void and enables the annulus which has been created to support the surrounding subsoil and thus prevent collapse of the reamed length. Depending on the prevalent ground conditions, it may be necessary to repeat the drilling process by incrementally increasing the size of the reamers. When the reamer enters the launch pit, it is removed from the drill rods which are then passed back up the bore to the reception pit and the next size reamer is attached to the drill rods and the process is repeated until the required bore with the allowable tolerance is achieved.





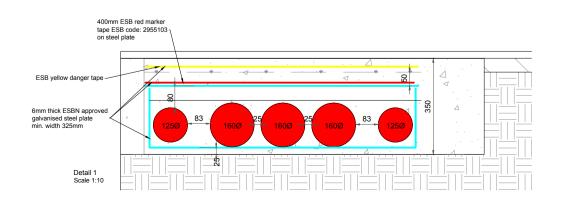


Figure 2.5 **Cable Trench Flatbed**

Formation Over Culvert

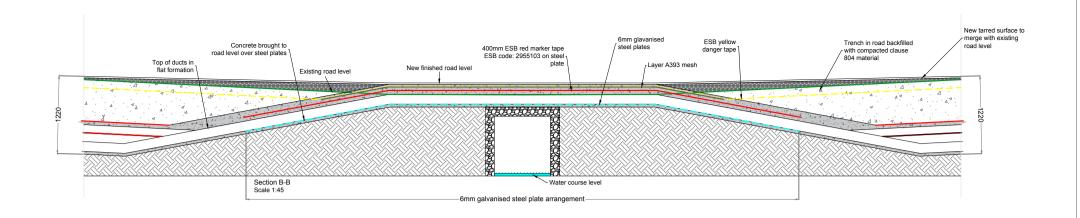
Meenbog Wind Farm, Co. Donegal

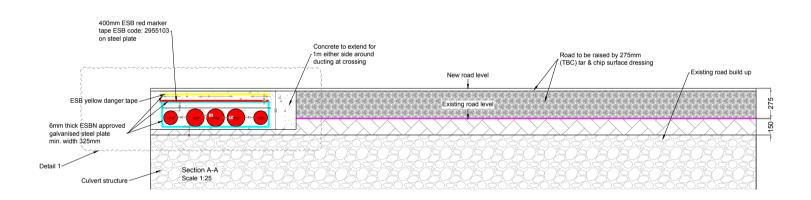
Joseph O Brien	Michael Watso	
PROJECT No.: 160502	0502 - 55	
As Shown @ A3	28.11.2017	



McCarthy Keville O'Sullivan Ltd. Planning & Environmental Consultants Galway Financial Services Centre,

Moneenageisha Road, Galway, Ireland. email: info@mccarthykos.ie website: www.mccarthykos.ie Tel: +353 91 735611 Fax: +353 91 771279





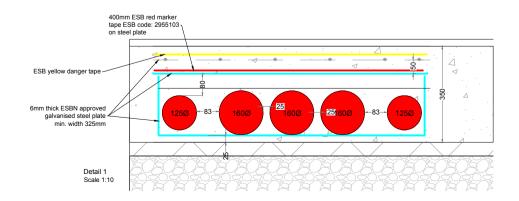


Figure2.6

Cable Trench Flatbed at Road Surface Level

Meenbog Wind Farm, Co. Donegal

Joseph O Brien	Michael Watsor	
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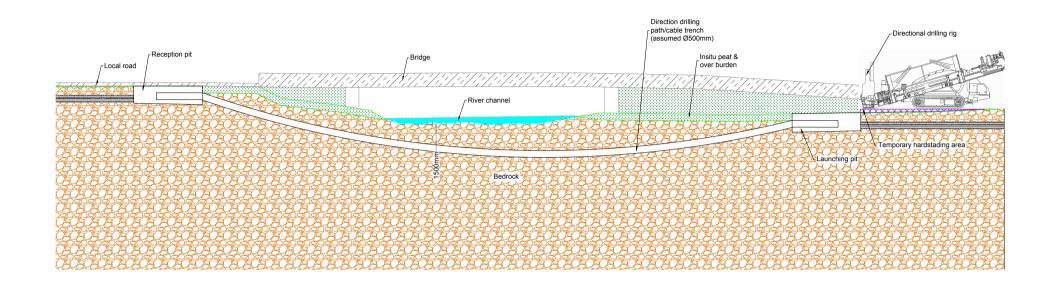




Figure 2.7 **Directional Drilling**

Meenbog Wind Farm, Co. Donegal

Joseph O Brien Michael Watson 0502 - 57 28.11.2017 1:200 @ A3



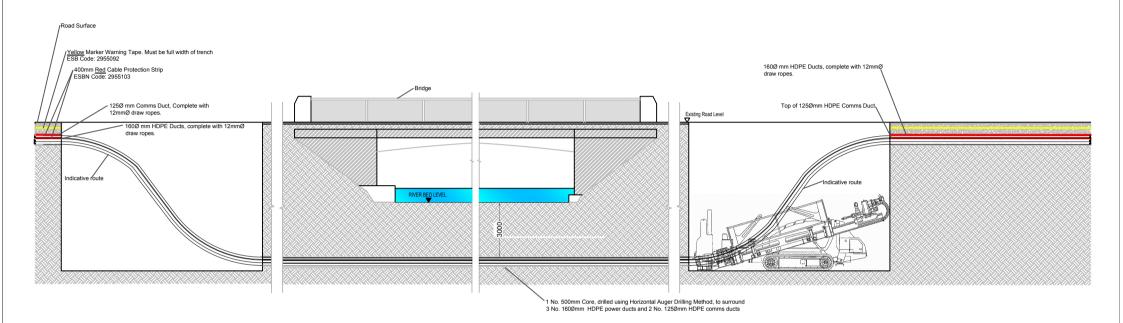
McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants
Block 1,
Gallway Financial Services Centre,
Monenageisha Road,
Gallway, Ireland,
ewebalar own roccurbylocs is
ewebalar own roccurbylocs is
Tel: +335 91 771279
Fax: +353 91 771279

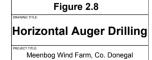
The use of a natural, inert and biodegradable drilling fluid such as *Clear Bore*TM is intended to negate any adverse impacts arising from the use of other, traditional polymer-based drilling fluids and will be used sparingly as part of the drilling operations. It will be appropriately stored prior to use and deployed in the required amounts to avoid surplus. Should any excess drilling fluid accumulate in the reception or drilling pits, it will be contained and removed from the site in the same manner as other subsoil materials associated with the drilling process to an a licensed recovery facility.

Backfilling of launch & reception pits will be conducted in accordance with the normal specification for backfilling excavated trenches. The directional drilling methodology is further detailed in Figure 2.7.

Horizontal Drilling - Option 5

The process of horizontal drilling is carried out by an auger boring machine. The methods employed are similar to directional drilling (a launch and reception pit are required). The drilling pit for horizontal drilling is excavated to a depth greater than that required for directional drilling. This is necessary as the drilling process is horizontal only and cannot drill in a downward direction to get under a watercourse as in the case of directional drilling. Therefore, the drilling pit is excavated to a base level at which the drilling will take place which will be a minimum of 3 metres below the bed of the watercourse. The auger boring machine is mobilised within the drilling pit where an air driven auger cutting head bores through the ground horizontally. The drilled bore is supported by a steel sleeve which is hammered through the opening by air compressors during drilling to avoid collapse. The spoil material passes back through the auger within the steel sleeve and out of the bored channel. The process is continued until the crossing reaches the opposing reception pit on the other side of the watercourse. Electrical ducts will be passed through the sleeves and the steel sleeves will then be removed. The entire excavation will be backfilled as necessary. The horizontal drilling methodology is illustrated in Figure 2.8.





McC Plann Block Galw

McCarthy Keville O'Sullivan Ltd.
Planning & Environmental Consultants
Block 1,
Galway Financial Services Centre,
Moneenageshal Road,
Galway, Ireland,
email: info@mccarthykos.ie
website: www.mccarthykos.ie
Tei: +353 91 736511
Fax: +353 91 771279

Table 2.1 Grid Connection Route Bridge Crossings Methodology

Table 2.1 Grid Connection Route Bridge Crossings Methodology					
Bridge Crossing no.	Name	Description	Watercourse Crossing Option	Extent of In- stream Works	
1	Lowerymore Bridge	The existing bridge consists of a concrete deck which cannot be excavated for a cable trench therefore the cable will be installed under the watercourse by means of directional or horizontal drilling which will ensure that no contact will be made with the watercourse during the works.	Option 4/5	None. No in- stream works required.	
2	Lower Keadew Bridge	The existing bridge consists of a concrete deck which cannot be excavated for a cable trench therefore the cable will be installed under the watercourse by means of directional or horizontal drilling which will ensure that no contact will be made with the watercourse during the works.	Option 4/5	None. No in- stream works required.	
3	Barnesmore Bridge	Stone arch bridge which cannot be excavated for a cable trench therefore the cable will be installed under the watercourse by means of directional or horizontal drilling which will ensure that no contact will be made with the watercourse during the works.	Option 4/5	None. No in- stream works required.	

2.4.2.11.5 General Construction Measures

Prior to any works commencing a dilapidation survey will be conducted of the entire grid connection route, photographing and noting any existing damage or defects to structure or road surfaces. A copy of this survey will be submitted to Donegal County Council prior to works commencing.

Communication with the public, local residences and businesses along the route will be an important responsibility of the project supervisor. Keeping all affected parties up to date and informed both shortly prior and during the construction period at all times. Two to three weeks before any work commencing reasonable efforts will be made to inform all affected parties of the oncoming works.

Signage will be erected in the weeks prior to any works commencing along and on adjacent roads to the cable route notifying the public of the forthcoming construction. Contact details for the contractor and details of license will also be posted along the cable route during construction.

Every effort will be made to minimise the impact of the above works on local residences and traffic. Consideration will also be given to the agricultural community and works will be organised and sequenced so as not to inconvenience any such activities.

- All personnel will be inducted and made familiar with the method statements, risk assessments and traffic management plans involved.
- All site-specific safety rules will be adhered to.
- All plant operators will have appropriate CSCS training.
- All personnel will have SOLAS Safe Pass training
- Fire extinguishers and first aid supplies will be available in the work area.
- The road way will be maintained in clean condition at all times.
- Helmets, high visibility clothing and safety footwear will be worn at all times.
- A competent foreman will be on site at all times.
- Excavations are back filled at the end of each working day.
- The trench will not be over crowded.
- Unauthorised access will be monitored and prevented.
- Pipe work will be lifted into position manually.
- Hand dig will be used to expose any services detected during the survey.

2.4.2.12 Recreation and Amenity Areas

The proposed recreation and amenity facilities consist of a series of marked walkways, complimented by waypoint signage, and visitor facilities in the form of a car park, play areas, barbeque area, picnic area and community garden. The walkways will be constructed with the same methodology for site access roads. The temporary construction compound located in the north of the site will provide an amenity area within the site once the Proposed Development has been commissioned. This area will be developed as a compound initially so it will be well established requiring only minor works to accommodate the facilities proposed.

Waypoint signage will be installed throughout the proposed recreation and amenity area to provide information and location reference point for facility users. The signage will be installed as part of the amenity walkway construction where the signage poles will be erected in concrete footings.

2.4.2.13 Decommissioning

The design life of the wind farm is 30 years after which time decommissioning will occur. At the end of the design life of the wind farm, or if the operations at the wind farm cease for a period of greater than one year, the turbines, met mast and all their

associated above ground components will be removed from site. The turbine foundations will be covered with soil to facilitate re-vegetation. The management of waste materials arising from the decommissioning of the development is outlined in the Waste Management Plan (Section 3 below).

Site roadways could be in use for other purposes other than the wind operation of the wind farm by the time the decommissioning of the project is to be considered, and therefore it may be more appropriate to leave the site roads in situ for future use. If it were to be confirmed that the roads were not required in the future for any other useful purpose, they could be removed

The substation will remain in place as it will be under the ownership of the ESB/EirGrid. Underground cables will be removed and the ducting left in place.

A full reinstatement plan will be submitted to Donegal County Council three months prior to decommissioning.

3 ENVIRONMENTAL MANAGEMENT

3.1 Introduction

This CEMP has been prepared and presented as a standalone document and includes all drainage measures required to construct the wind farm. The drainage proposals will be developed further prior to the commencement of construction however, any such improvements will be in line with the principles and mitigation presented in the EIAR. The following sections give an overview of the drainage design, dust and noise control measures and a waste management plan for the site.

3.2 Protecting Water Quality

3.2.1 Good Environmental Management During Construction

Timing of road works can strongly influence the potential for damaging the freshwater environment. Operations during wetter periods of the year pose a significantly greater risk of causing erosion and siltation, which can be particularly severe following major rainfall or snowmelt events. Traditionally, wind farm construction undertaken during the drier summer months would result in significantly less erosion and siltation. Construction activities in the hydrological buffer zones shall be avoided during or after prolonged rainfall or an intense rainfall event and work will cease entirely near watercourses when it is evident that water quality is being impacted. Given that this site has an established road network and existing watercourse crossing points, there will be minimal impacts on watercourses.

3.2.2 Site Drainage Principles

The site drainage features for this site have previously been outlined in Section 4.7 of the EIAR and are again further developed in Section 4 of this CEMP. The protection of the watercourses within and surrounding the site, and downstream catchments that they feed is of utmost importance in considering the most appropriate drainage proposals for the site of the proposed development. No routes of any natural drainage features will be altered as part of the proposed development as new watercourse crossings are kept to a minimum to facilitate the proposed development. Turbine locations and associated roadways were originally selected to avoid natural watercourses and existing roads are to be used wherever possible. The proposed development has where possible, been kept a minimum of 50 metres from natural watercourses. There will be no direct discharges to any natural watercourses, with all drainage waters being dispersed as overland flows. Buffer zones around the existing natural drainage features have informed the layout of the proposed development.

Existing artificial drains in the vicinity of existing site roads will be maintained in their present location where possible. If it is expected that these artificial drains will receive drainage water from works areas, check dams will be added (as specified below) to control flows and sediment loads in these existing artificial drains. If road widening or improvement works are necessary along the existing roads, where possible, the works will take place on the opposite side of the road to the drain.

3.2.3 Legislation and Best Practice Guidance

The drainage design has been prepared based on experience of the project team of other wind farm sites in peat-dominated environments, and the number of best practice guidance documents.

There is no one guidance document that deals with drainage management and water quality controls for wind farm developments. However, a selection of good practice approaches have been adopted in preparation of this CEMP, and these are taken from the various best practice guidance documents listed below. These relate to infrastructure and operational works on forested sites, forest road design, water quality controls for linear projects, forestry road drainage and management of geotechnical risks. To achieve best practice in terms of water protection through construction management all drainage management is prepared in accordance with guidance contained in the following:

- Forestry Commission (2004): Forests and Water Guidelines, Fourth Edition.
 Publ. Forestry Commission, Edinburgh;
- Coillte (2009): Forest Operations & Water Protection Guidelines;
- Forest Service (Draft): Forestry and Freshwater Pearl Mussel Requirements –
 Site Assessment and Mitigation Measures;
- Forest Service (2000): Forestry and Water Quality Guidelines. Forest Service, DAF, Johnstown Castle Estate, Co. Wexford;
- Forest Service, (2000): Code of Best Forest Practice Ireland. Forest Service,
 DAF, Johnstown Castle Estate, Co. Wexford;
- COFORD (2004): Forest Road Manual Guidelines for the design, construction and management of forest roads;
- MacCulloch (2006): Guidelines for risk management of peat slips on the construction of low volume low cost roads over peat (Frank MacCulloch Forestry Civil Engineering Forestry Commission, Scotland);
- Authority (2005): Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes;
- Wind Farm Development Guidelines for Planning Authorities (September 1996);
- Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites. Eastern Regional Fisheries Board;
- Guidelines on Protection of Fisheries During Construction Works Adjacent to Waters, Inland Fisheries Ireland (2016):;
- Good Practice During Wind Farm Construction (Scottish Natural Heritage, 2010);
- PPG1 General Guide to Prevention of Pollution (UK Guidance Note);
- PPG5 Works or Maintenance in or Near Water Courses (UK Guidance Note);
- CIRIA (Construction Industry Research and Information Association) guidance on 'Control of Water Pollution from Linear Construction Projects' (CIRIA Report No. C648, 2006);
- Control of water pollution from construction sites Guidance for consultants and contractors. CIRIA C532. London, 2001; and,
- Control of water pollution from linear construction projects -Technical quidance. CIRIA C648 London, 2006.

3.2.4 Site Drainage Design and Management

The proposed site drainage features for this site are outlined in Section 4.7 of the EIAR. As this CEMP is a working document and is presented as an Appendix to the EIAR, the detailed drainage measures are not included in this document. When the final CEMP report is prepared and presented as a standalone document, all drainage measures will be included in that document. The drainage proposals will be developed further prior to the commencement of construction. The following sections give an outline of drainage management arrangements in terms of pre-construction, construction and operational phases of the Proposed Development.

3.2.4.1 Pre-Construction Drainage

There is an existing drainage network across the site, and due to the sloping nature of the area, runoff drains relatively freely to local watercourses and streams. This existing drainage system will continue to function as it is during the pre-construction phase.

However, prior to commencement of works in sub-catchments across the site main drain inspections will be competed to ensure ditches and streams are free from debris and blockages that may impede drainage. It is proposed to complete these inspections on a catchment by catchment basis as the construction works develop across the site, as works in all areas will not commence simultaneously.

3.2.4.2 Construction Phase Drainage

The Project Hydrologist/Design Engineer will complete a site drainage plan before construction commences and will attend the site to set out and assist with micro siting of proposed drainage controls as outlined in Section 4.7 of the EIAR. The drainage system will be excavated and constructed in conjunction with the road and hard standing construction. Drains will be excavated and stilling ponds constructed to eliminate any suspended solids within surface water running off the site.

Best practice and practical experience on other similar projects suggests that in addition to the drainage plans that are included in the EIAR, there are additional site based decisions and plans that can only be made in the field through interaction between the Site Construction Manager, the Project Hydrologist and the Project Geotechnical Engineers. The mechanisms for interaction between these are outlined within Section 4 of this CEMP.

In relation to decisions that are made on site it is important to stress that these will be implemented in line with the associated drainage controls and mitigation measures outlined in Section 6 below, and to ensure protection of all watercourses.

3.2.4.3 Operational Phase Drainage

The project hydrologist will inspect and review the drainage system after construction has been completed to provide guidance on the requirements of an operational phase drainage system. This operational phase drainage system will have been installed during the construction phase in conjunction with the road and hardstanding construction work as described below:

- Interceptor drains will be maintained up-gradient of all proposed infrastructure to collect clean surface runoff, in order to minimise the amount of runoff reaching areas where suspended sediment could become entrained. It will then be directed to areas where it can be re-distributed over the ground by means of a level spreader.
- Swales/road side drains will be maintained to intercept and collect runoff from access roads and hardstanding areas of the site, likely to have entrained suspended sediment, and channel it to stilling ponds for sediment settling;
- Check dams will be maintained at regular intervals along interceptor drains and swales/roadside drains in order to reduce flow velocities and therefore minimise erosion within the system during storm rainfall events; and,
- Stilling ponds/settlement ponds, emplaced downstream of swales and roadside drains, will buffer volumes of runoff discharging from the drainage system during periods of high rainfall, by retaining water until the storm hydrograph has receded, thus reducing the hydraulic loading to watercourses. The stilling ponds will be sized according to the size of the area they will be

receiving water from, but will be sufficiently large to accommodate peak flows storm events. Inspection and maintenance of all settlement ponds will be ongoing through the construction period.

3.2.4.4 Preparative Site Drainage Management

All materials and equipment necessary to implement the drainage measures outlined above will be brought on-site in advance of any works commencing.

An adequate quantity of straw bales, clean stone, terram, stakes, etc. will be kept on site at all times to implement the drainage design measures as necessary. The drainage measures outlined in the above will be installed prior to, or at the same time as the works they are intended to drain.

3.2.4.5 Pre-emptive Site Drainage Management

The works programme for the groundworks part of the construction phase of the project will also take account of weather forecasts, and predicted rainfall. Large excavations and movements of overburden or large-scale overburden or soil stripping will be suspended or scaled back if heavy rain is forecast. The extent to which works will be scaled back or suspended will relate directly to the amount of rainfall forecast.

3.2.4.6 Reactive Site Drainage Management

The final drainage design prepared for the site has provided for reactive management of drainage measures. The effectiveness of drainage measures designed to minimise runoff entering works areas and capture and treat silt-laden water from the works areas, will be monitored continuously by the Environmental Clerk of Works (ECoW) onsite. The ECoW or supervising hydrologist will respond to changing weather, ground or drainage conditions on the ground as the project proceeds, to ensure the effectiveness of the drainage design is maintained in so far as is possible. This may require the installation of additional check dams, interceptor drains or swales as deemed necessary on-site. The drainage design may have to be modified on the ground as necessary, and the modifications will draw on the various features outlined above in whatever combinations are deemed to be most appropriate to situation on the ground at a particular time.

In the event that works are giving rise to siltation of watercourses, the ECoW or supervising hydrologist will stop all works in the immediate area around where the siltation is evident. The source of the siltation will be identified and additional drainage measures such as those outlined above will be installed in advance of works recommencing.

3.3 Cable Trench Drainage

Cable trenches are typically developed in short sections, thereby minimising the amount of ground disturbed at any one time, and minimising the potential for drainage runoff to pick up silt or suspended solids. Each short section of trench is excavated, ducting installed and bedded, and backfilled with the appropriate materials, before work on the next section commences.

To efficiently control drainage runoff from cable trench works areas, excavated material is stored on the upgradient side of the trench. Should any rainfall cause runoff from the excavated material, the material is contained in the downgradient cable trench. Excess subsoil is removed from the cable trench works area immediately upon excavation, and in the case of the proposed development, would be transported to one

of the on-site borrow pits or used for landscaping and reinstatements of other areas elsewhere on site.

On steeper slopes, silt fences, as detailed in Section 4.7.5 of the EIAR will be installed temporarily downgradient of the cable trench works area, or on the downhill slope below where excavated material is being temporarily stored to control run-off.

Measures that will be implemented to ensure that directional or horizontal drilling works, underneath watercourse channels, do not have a negative effect on water quality are outlined below, including a blow-out (Frac-out) prevention and contingency plan.

- In order to prevent significant water quality impacts and morphological impacts, trenchless technology will be carried out to install the cable below the watercourse;
- Although no in-stream works are proposed, the drilling works will only be done over a dry period between July and September (as required by IFI for in-stream works) to avoid the salmon spawning season and to have more favourable (dryer) ground conditions;
- The crossing works area will be clearly marked out with fencing or flagging tape to avoid unnecessary disturbance of vegetation;
- A minimum 15 metre vegetative buffer zone will be maintained between the works area and the watercourse;
- There will be no storage of material / equipment or overnight parking of machinery inside the 15m buffer zone;
- Before any ground works are undertaken, double silt fencing will be placed upslope of the watercourse channel along the 15m buffer zone boundary;
- Additional silt fencing or straw bales (pinned down firmly with stakes) will be placed across any natural surface depressions / channels that slope towards the watercourse:
- Silt fencing will be embedded into the local soils to ensure all site water is captured and filtered;
- The area around the bentonite batching, pumping and recycling plant will be bunded using terram (as it will clog) and sandbags in order to contain any spillages;
- Drilling fluid returns will be contained within a sealed tank / sump to prevent migration from the works area;
- Spills of drilling fluid will be clean up immediately and stored in an adequately sized skip before been taken off-site;
- If rainfall events occur during the works, there will be a requirement to collect and treat small volumes of surface water from areas of disturbed ground (i.e. soil and subsoil exposures created during site preparation works);
- This will be completed using a shallow swale and sump down slope of the disturbed ground; and water will be pumped to a proposed percolation area at least 50m from the watercourse
- The discharge of water onto vegetated ground at the percolation area will be via a silt bag which will filter any remaining sediment from the pumped water.
 The entire percolation area will be enclosed by a perimeter of double silt fencing;
- Any sediment laden water from the works area will not be discharged directly to a watercourse or drain:
- Works shall not take place during periods of heavy rainfall and will be scaled back or suspended if heavy rain is forecasted;

- Daily monitoring of the compound works area, the water treatment and pumping system and the percolation area will be completed by a suitably qualified person during the construction phase. All necessary preventative measures will be implemented to ensure no entrained sediment, or deleterious matter is discharged to the watercourse
- If high levels of silt or other contamination is noted in the pumped water or the treatment systems, all construction works will be stopped. No works will recommence until the issue is resolved and the cause of the elevated source is remedied;
- On completion of the works, the ground surface disturbed during the site preparation works and at the entry and exit pits will be carefully reinstated and re-seeded at the soonest opportunity to prevent soil erosion;
- The silt fencing upslope of the river will be left in place and maintained until the disturbed ground has re-vegetated;
- There will be no batching or storage of cement allowed at the watercourse crossing;
- There will be no refuelling allowed within 100m of the watercourse crossing;
 and,
- All plant will be checked for purpose of use prior to mobilisation at the watercourse crossing.

Fracture Blow-out (Frac-out) Prevention and Contingency Plan

- The drilling fluid/bentonite will be non-toxic and naturally biodegradable (i.e. Clear Bore Drilling Fluid or similar will be used);
- The area around the drilling fluid batching, pumping and recycling plants will be bunded using terram and/or sandbags to contain any potential spillage;
- One or more lines of silt fencing will be placed between the works area and the adjacent river;
- Spills of drilling fluid will be cleaned up immediately and transported off-site for disposal at a licensed facility;
- Adequately sized skips will be used where temporary storage of arisings are required;
- The drilling process / pressure will be constantly monitored to detect any possible leaks or breakouts into the surrounding geology or local watercourse;
- This will be gauged by observation and by monitoring the pumping rates and pressures. If any signs of breakout occur then drilling will be immediately stopped;
- Any frac-out material will be contained and removed off-site;
- The drilling location will be reviewed, before re-commencing with a higher viscosity drilling fluid mix; and,
- If the risk of further frac-out is high, a new drilling alignment will be sought at the crossing location.

3.4 Refuelling, Fuel and Hazardous Materials Storage

The following mitigation measures are proposed to avoid release of hydrocarbons at the site:

- Minimal refuelling or maintenance of construction vehicles or plant will take place on site. Off-site refuelling should occur at a controlled fuelling station;
- On-site refuelling will take place using a mobile double skinned fuel bowser.
 The fuel bowser, a double-axel custom-built refuelling trailer will be re-filled off site, and will be towed around the site by a 4x4 jeep to where machinery is located. It is not practical for all vehicles to travel back to a single refuelling

point, given the size of the cranes, excavators, etc. that will be used during the construction of the wind farm. The 4x4 jeep will also carry fuel absorbent material and pads in the event of any accidental spillages. The fuel bowser will be parked on a level area in the construction compound when not in use. Only designated trained and competent operatives will be authorised to refuel plant on site. Mobile measures such as drip trays and fuel absorbent mats will be used during all refuelling operations.

- Fuels volumes stored on site should be minimised. Any fuel storage areas will be bunded appropriately for the fuel storage volume for the time period of the construction and fitted with a storm drainage system and an appropriate oil interceptor;
- The electrical substation building will be bunded appropriately to the volume of oils likely to be stored, and to prevent leakage of any associated chemicals and to groundwater or surface water. The bunded area will be fitted with a storm drainage system and an appropriate oil interceptor;
- The plant used should be regularly inspected for leaks and fitness for purpose; and,
- An emergency plan for the construction phase to deal with accidental spillages will be contained within Environmental Management Plan. Spill kits will be available to deal with and accidental spillage in and outside the refuelling area.

3.5 Tree Felling

Mitigation measures will reduce the risk of entrainment of suspended solids and nutrient release in surface watercourses. These measures are derived from best practice guidance documents as outlined in Section 9.4.2 of the EIAR. The water protection measures to be adopted during felling operations are set out as follows:

- Machine combinations will be chosen which are most suitable for ground conditions at the time of felling and to minimise soils disturbance;
- Use of buffer zones for aquatic zones (see Table 3.1 below);
- Checking and maintenance of roads and culverts will be on-going through any felling operation. No tracking of vehicles through watercourses will occur, as vehicles will use road infrastructure and existing watercourse crossing points.
 Where possible, existing drains will not be disturbed during felling works;
- Ditches which drain from the proposed area to be felled towards existing surface watercourses will be blocked, and temporary silt traps will be constructed. No direct discharge of such ditches to watercourses will occur. Drains and sediment traps should be installed during ground preparation. Collector drains will be excavated at an acute angle to the contour (~0.3%-3% gradient), to minimise flow velocities. Main drains to take the discharge from collector drains will include water drops and rock armour, as required, where there are steep gradients, and should avoid being placed at right angles to the contour:
- Sediment traps will be sited outside of buffer zones and will have no direct outflow into the aquatic zone. Machine access will be maintained to enable the accumulated sediment to be excavated. Sediment will be carefully disposed of away from all aquatic zones. Where possible, all new silt traps will be constructed on even ground and not on sloping ground;
- In areas particularly sensitive to erosion, it may be necessary to install double or triple sediment traps. This measure will be reviewed on site during construction;
- All drainage channels will taper out before entering the aquatic buffer zone.
 This ensures that discharged water gently fans out over the buffer zone before

- entering the aquatic zone, with sediment filtered out from the flow by ground vegetation within the zone. On erodible soils, silt traps will be installed at the end of the drainage channels, to the outside of the buffer zone;
- Drains and silt traps will be maintained throughout all felling works, ensuring that they are clear of sediment build-up and are not severely eroded. Correct drain alignment, spacing and depth will ensure that erosion and sediment build-up are minimised and controlled;
- Brash mats will be used to support vehicles on soft ground, reducing peat and mineral soils erosion and avoiding the formation of rutted areas, in which surface water ponding can occur. Brash mat renewal should take place when they become heavily used and worn. Provision should be made for brash mats along all off-road routes, to protect the soil from compaction and rutting. Where there is risk of severe erosion occurring, extraction should be suspended during periods of high rainfall;
- Timber should be stacked in dry areas, and outside a local 50m stream buffer zone. Straw bales and check dams to be emplaced on the down gradient side of timber storage/processing sites;
- Works should be carried out during periods of no, or low rainfall, in order to minimise entrainment of exposed sediment in surface water run-off;
- Checking and maintenance of roads and culverts will be on-going through the felling operation;
- Refuelling or maintenance of machinery will not occur within 50m of an aquatic
- Branches, logs or debris will not be allowed to build up in aquatic zones. All such material will be removed when harvesting operations have been completed, but care will be taken to avoid removing natural debris deflectors.

Table 3.1 Minimum Buffer Zone Widths (Forest Service, 2000)

Average slope leading to the aquatic zone		Buffer zone width on either side of the aquatic zone	Buffer zone width for highly erodible soils
Moderate	(0 – 15%)	10 m	15 m
Steep	(15 – 30%)	15 m	20 m
Very steep	(>30%)	20 m	25 m

3.6 Cement Based Products Control Measures

The following mitigation measures are proposed to avoid release of cement leachate from the site:

- No batching of wet-cement products will occur on site;
- Ready-mixed supply of wet concrete products and where possible, emplacement of pre-cast elements, will take place. Where possible pre-cast elements for culverts and concrete works will be used;
- No washing out of any plant used in concrete transport or concreting operations will be allowed on-site;
- Where concrete is delivered on site, only chute cleaning will be permitted, using the smallest volume of water possible. No discharge of cement contaminated waters to the construction phase drainage system or directly to any artificial drain or watercourse will be allowed.
- Use weather forecasting to plan dry days for pouring concrete;
- Ensure pour site is free of standing water and plastic covers will be ready in case of sudden rainfall event;

■ The small volume of water that will be generated from washing of the concrete lorry's chute will be directed into a concrete washout area, typically built using straw bales and lined with an impermeable membrane. Two examples are shown in Plates 3.1 and 3.2 below. The areas are generally covered when not in use to prevent rainwater collecting. In periods of dry weather, the areas can be uncovered to allow much of the water to be lost to evaporation. At the end of the concrete pours, any of the remaining liquid contents is tankered off-site. Any solid contents that will have been cleaned down from the chute will have solidified and can be broken up and disposed of along with other construction waste.

The 50m wide river buffer zone and 20 m existing artificial drainage buffer will be emplaced for the duration of the construction phase. No construction activity will occur within the buffer zone with the exception of bridge and culvert construction. The buffer zone will:

- Prevent any cement based products accidentally entrained in the construction phase drainage system entering directly into watercourses, achieved in part by ending drain discharge outside the 50m buffer zone and allowing percolation across the vegetation of the buffer zone;
- Provide a buffer against accidental direct run-off to surface waters by any pollutants, or by pollutants entrained in surface water run-off.



Plate 3.1 Concrete washout area



Plate 3.2 Concrete washout area

3.7 Peat Stability Management

Peat instability or failure refers to a significant mass movement of a body of peat that would have an adverse impact on wind farm development and the surrounding environment. Peat failure excludes localised movement of peat that could occur below an access road, creep movement or erosion type events. In the absence of appropriate mitigation, the consequence of peat failure at the study area may result in:

- Death or injury to site personnel;
- Damage to machinery;
- Damage or loss of access tracks;
- Drainage disrupted;
- Site works damaged or unstable;
- Contamination of watercourses, water supplies by sediment particulates; and,
- Degradation of the environment.

3.7.1 General Recommendations for Good Construction Practice

The peat stability assessment indicates that there is insignificant risk of peat failure, although drainage mitigation measures would be required to prevent the buildup of water in the peat and reduce the risk of failure (AGEC, 2017).

The following issues incorporated into the construction phase of the project will assist in the management of the risks for this site (AGEC, 2017):

- Appointment of experienced and competent contractors;
- The site should be supervised by experienced and qualified personnel;
- Allocate sufficient time for the project (be aware that decreasing the construction time has the potential to increase the risk of initiating a peat movement);
- Prevent undercutting of slopes and unsupported excavations;
- Maintain a managed robust drainage system;
- Prevent placement of loads/overburden on marginal ground;
- Set up, maintain and report readings from peat stability monitoring systems;
- Ensure construction method statements are followed or where agreed modified/ developed; and,
- Revise and amend the Geotechnical Risk Register as construction progresses.

3.8 Dust Control

Construction dust can be generated from many on-site activities such as excavation and backfilling. The extent of dust generation will depend on the type of activity undertaken, the location, the nature of the dust, *i.e.* soil, sand, peat, etc. and the weather. In addition, dust dispersion is influenced by external factors such as wind speed and direction and/or, periods of dry weather. Construction traffic movements also have the potential to generate dust as they travel along the haul route.

Proposed measures to control dust include:

- Any site roads with the potential to give rise to dust will be regularly watered, as appropriate, during dry and/or windy conditions;
- The designated public roads outside the site and along the main transport routes to the site will be regularly inspected by the ECoW for cleanliness, and cleaned as necessary;
- Material handling systems and material storage areas will be designed and laid out to minimise exposure to wind;
- Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods;
- Water misting or bowsers will operate on-site as required to mitigate dust in dry weather conditions;
- The transport of soils or other material, which has significant potential to generate dust, will be undertaken in tarpaulin-covered vehicles where necessary;
- All construction related traffic will have speed restrictions on un-surfaced roads to 20 kph;
- Daily inspection of construction sites to examine dust measures and their effectiveness.
- When necessary, sections of the haul route will be swept using a truck mounted vacuum sweeper; and,
- All vehicles leaving the construction areas of the site will pass through a wheel cleansing area prior to entering the local road network.

3.9 Noise Control

The operation of plant and machinery, including construction vehicles, is a source of potential impact that will require mitigation at all locations within the site. Proposed measures to control noise include:

- Diesel generators will be enclosed in sound proofed containers to minimise the potential for noise impacts;
- Plant and machinery with low inherent potential for generation of noise and/or vibration will be selected. All construction plant and equipment to be used onsite will be modern equipment and will comply with the European Communities (Construction Plant and Equipment) (Permissible Noise Levels) Regulations;
- Regular maintenance of plant will be carried out in order to minimise noise emissions. Particular attention will be paid to the lubrication of bearings and the integrity of silencers;
- All vehicles and mechanical plant will be fitted with effective exhaust silencers and maintained in good working order for the duration of the works;
- Compressors will be of the "sound reduced" models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use and all ancillary pneumatic tools shall be fitted with suitable silencers;
- Machines, which are used intermittently, will be shut down during those periods when they are not in use;
- Training will be provided by the ECoW to drivers to ensure smooth machinery operation/driving, and to minimise unnecessary noise generation; and,
- Local areas of the haul route will be condition monitored and maintained if necessary.

3.10 Invasive Species Management

A baseline invasive species survey will be carried out at the site to identify the presence and location of any invasive species (listed under the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011) by a suitably qualified ecologist. If the presence of such species is found at or adjacent to the site, particularly in areas where its excavation may be required, an invasive species management plan will be prepared for the site to prevent the introduction or spread of any invasive species within the footprint of the works. An invasive species management plan, if required, will set out best practice control methods as summarised in the following sections.

3.10.1 General Best Practice Control Methods

The following general best practice guidelines in the treatment and control of invasive species during construction works are outlined below having regard to guidance documents outlined in Section 2.5 particularly those issued by the National Roads Authority (2010).

3.10.2 Site Management

Careful preparation of the site and planning of the works is crucial to successful treatment of invasive species. The following list of guidelines, which is not exhaustive, shall be followed by all on-site personnel. Only those who have been inducted into biosecurity measures on-site may enter the contaminated zones within the works areas. Should any risk of contaminated material escaping be observed by the site supervisor, the management plan for the site must be amended by an appropriately qualified person to mitigate against the risk.

3.10.3 Establishing Good Site Hygiene

- A risk assessment and method statement must be provided by the Contractor prior to commencing works.
- Fences will be erected around areas of infestation, as confirmed by test pits, and warning signs shall be erected.
- A designated wash-down area will be created, where power-washed material from machinery can be contained, collected and disposed of with other contaminated material. This area will contain a washable membrane or hard surface.
- Stockpile areas will be chosen to minimise movement of contaminated soil.
- Stockpiles will be marked and isolated.
- Contaminated areas which will not be excavated will be protected by a root barrier membrane if they are likely to be disturbed by machinery. Root barrier membranes will be protected by a layer of sand above and below and topped with a layer of hardcore.
- The use of vehicles with caterpillar tracks within contaminated areas will be avoided to minimise the risk of spreading contaminated material.
- An ECoW/suitably qualified ecologist will be on site to monitor and oversee the implementation of invasive species management plans.

Plant and equipment which is operated within an area for the management of materials in contaminated areas should be decontaminated prior to relocating to a different works area. The decontamination procedures should take account of the following:

- Personnel may only clean down if they are familiar with the plant and rhizome material, and can readily identify it.
- Decontamination will only occur within designated wash-down areas.
- Vehicles will be cleaned using stiff-haired brush and pressure washers, paying special attention to any areas that might retain rhizomes e.g. wheel treads and arches.
- All run-off will be isolated and treated as contaminated material. This will be disposed of in already contaminated areas.

3.11 Waste Management

This section of the CEMP provides a waste management plan (WMP) which outlines the best practice procedures during the excavation and construction phases of the project. The WMP will outline the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage. Disposal of waste will be seen as a last resort.

3.11.1 Legislation

The Waste Management Act 1996 and its subsequent amendments provide for measures to improve performance in relation to waste management, recycling and recovery. The Act also provides a regulatory framework for meeting higher environmental standards set out by other national and EU legislation.

The Act requires that any waste related activity has to have all necessary licenses and authorisations. It will be the duty of the Waste Manager on the site of the development to ensure that all contractors hired to remove waste from the site have valid Waste Collection Permits. It will then be necessary to ensure that the waste is delivered to a licensed or permitted waste facility. The hired waste contractors and subsequent receiving facilities must adhere to the conditions set out in their respective permits and authorisations.

The Department of the Environment provides a document entitled, 'Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects' (2006). It is important to emphasise that no demolition will take place at this site however, this document was referred to throughout the process of completing this WMP.

3.11.2 Waste Management Hierarchy

The waste management hierarchy sets out the most efficient way of managing waste in the following order:

Prevention and Minimisation:

The primary aim of the WMP will be to prevent and thereby reduce the amount of waste generated at each stage of the project.

Reuse of Waste:

Reusing as much of the waste generated on site as possible will reduce the quantities of waste that will have to be transported off site to recovery facilities or landfill.

Recycling of Waste:

There are a number of established markets available for the beneficial use of Construction and Demolition waste such as using waste concrete as fill for new roads.

At all times during the implementation of the WMP, disposal of waste to landfill will be considered only as a last resort.

3.11.3 Construction Phase Waste Management Plan

3.11.3.1 Description of the Works

The proposed development will involve the construction of turbines, associated new site roads and upgrade of some existing roads, a substation & control building and an anemometry mast.

The proposed turbines will be manufactured off site and delivered to site where on-site assembly will occur.

The turbine and anemometry mast foundations will consist of stone excavated from the onsite borrow pit and a concrete base which will contain reinforcing steel. These concrete foundations will be shuttered with steel formwork specifically designed for the works and re-usable off site on similar projects.

The substation and control buildings will be constructed on a concrete foundation with the buildings constructed with concrete masonry blocks with a timber roof structure and roof tile or slate covering. The roof structure will be made up of prefabricated roof trusses manufactured off site to minimise timber cutting on site.

The site roads will be constructed with rock won from the onsite borrow pit.

The waste types arising from the construction phase of the proposed development are outlined in Table 3.2 below.

Table 3.2 Expected waste types arising during the Construction Phase

Materials type	Example	EWC
		Code
Cables	Electrical wiring	17 04 11
Cardboard	Boxes, cartons	15 01 01
Composite		
packaging	Containers	15 01 05
Metals	Copper, aluminium, lead, iron and steel	17 04 07
Inert materials	Sand, stones, plaster, rock, blocks	17 01 07
Mixed municipal	Daily canteen waste from construction workers,	
waste	miscellaneous	20 03 01
Plastic	PVC frames, electrical fittings	17 02 03
Plastic packaging	Packaging with new materials	15 01 02
Tiles and ceramics	Slates and tiles	17 01 03
Wooden packaging	Boxes, pallets	15 01 03

Hazardous wastes that may occur on site during the construction phase of the proposed development may include oil, diesel fuel, chemicals, paints, preservatives etc. All hazardous wastes will be stored in bunded containers/areas before being collected by an authorised waste contractor and brought to an EPA licensed waste facility. As mentioned above, hazardous wastes will be kept separate from non-hazardous wastes to ensure that contamination does not occur.

3.11.3.2 Waste Arisings and Proposals for Minimisation, Reuse and Recycling of Construction Waste

Construction waste will arise on the project mainly from excavation and unavoidable construction waste including material surpluses and damaged materials and packaging waste.

Appropriate measures should be taken to ensure excess waste is not generated during construction, including;

- Ordering of materials should be on an 'as needed' basis to prevent over supply to site. Co-ordination is required with suppliers enabling them to take/buy back surplus stock.
- Purchase of materials pre-cut to length to avoid excess scrap waste generated
- Request that suppliers use least amount of packaging possible on materials delivered to the site.
- Ensuring correct storage and handling of goods to avoid unnecessary damage that would result in their disposal
- Ensuring correct sequencing of operations.
- Use reclaimed materials in the construction works.

Hazardous waste will be kept separate from all other construction waste to prevent contamination and removed appropriately.

3.11.3.3 Waste Arising from Construction Activities

All waste generated on site will be contained in waste skips at a waste storage area on site. This waste storage area will be kept relatively tidy with the various waste skip clearly labelled to indicate the allowable material to be disposed of therein.

The expected waste volumes generated on site are unlikely to be large enough to warrant source segregation. Therefore, all wastes streams generated on site will be deposited into a single skip. This waste material will be transferred to a Materials Recovery Facility (MRF) by a fully licensed waste contractor where the waste will be sorted into individual waste streams for recycling, recovery or disposal.

The waste generated from the turbine erection will be limited to the associated protective covers which are generally reusable. Considering the specialist nature of this packaging material the majority will be taken back by suppliers for their own reuse. Any other packaging waste generated from the turbine supply will be deposited in the on-site skip and subsequently transferred to the MRF

It is not envisaged that there will be any waste material arising from the materials used to construct the road as only the quantity of stone necessary will be excavated from the borrow pit on an 'as needed' basis.

Site personnel will be instructed at induction that no under no circumstances can waste be brought to site for disposal in the on-site waste skip. It must also be made clear that the burning of waste material on site is forbidden.

3.11.4 Reuse

Many construction materials can be reused a number of times before they have to be disposed of:

- Concrete can be reused as aggregate for roads cable trench backfilling material.
- Plastic packaging etc. can be used to cover materials on site or reused for the delivery of other materials.
- Excavated peat will be can be reused for reinstatement of the areas around turbine foundations and adjacent to site roads.

3.11.5 Recycling

If a certain type of construction material cannot be reused on site, then recycling is the most suitable option. The opportunity for recycling on site will be restricted to the associated packaging from the wind turbines.

All waste that is produced during the construction phase including dry recyclables will be deposited in the on-site skip initially and sent for subsequent segregation at a remote facility. The low volume of such material that is anticipated to be generated at the proposed development is the justification for adopting this method of waste management.

3.11.6 Implementation

3.11.6.1 Roles and Responsibilities for Waste Management

Prior to the commencement of the proposed development a member of the on-site construction management staff will be assigned the role of Construction Waste Manager. The Construction Waste Manager will be in charge of the implementation of the objectives of the WMP, ensuring that all hired waste contractors have the necessary authorisations and that the waste management hierarchy is adhered to. The person nominated must have sufficient authority so that they can ensure everyone working on the proposed development adheres to the WMP.

3.11.6.2 Training

It is important for the Construction Waste Manager to communicate effectively with colleagues in relation to the aims and objectives of the WMP. All employees working on site during the construction phases of the project will be trained in materials management and thereby, should be able to:

- Distinguish reusable materials from those suitable for recycling;
- Ensure maximum segregation at source;
- Co-operate with site manager on the best locations for stockpiling reusable materials;
- Separate materials for recovery; and
- Identify and liaise with waste contractors and waste facility operators.

3.11.6.3 Record Keeping

The WMP will provide systems that will enable all arising, movements and treatments of construction waste to be recorded. This system will enable the contractor to measure and record the quantity of waste being generated. It will highlight the areas from which most waste occurs and allows the measurement of arising against performance targets. The WMP can then be adapted with changes that are seen through record keeping.

The fully licensed waste contractor employed to remove waste from the site will be required to provide documented records for all waste dispatches leaving the site of the proposed development. Each record will contain the following:

- Consignment Reference Number
- Material Type(s) and EWC Code(s)
- Company Name and Address of Site of Origin
- Trade Name and Collection Permit Ref. of Waste Carrier
- Trade Name and Licence Ref. of Destination Facility
- Date and Time of Waste Dispatch
- Registration no. of Waste Carrier vehicle
- Weight of Material
- Signature of Confirmation of Dispatch detail
- Date and Time of Waste Arrival at Destination
- Weight of Material
- Site Address of Destination Facility

3.11.6.4 Waste Management Plan Conclusion

The WMP will be properly adhered to by all staff involved in the project which will be outlined within the induction process for all site personnel. The waste hierarchy should always be employed when designing the plan to ensure that the least possible amount of waste is produced during the construction phase. Reuse of certain types of construction wastes will cut down on the cost and requirement of raw materials therefore further minimising waste levels.

This preliminary WMP has been prepared to outline the main objectives that are to be adhered to for the preparation of a more detailed WMP to be completed after the planning phase of the proposed development.

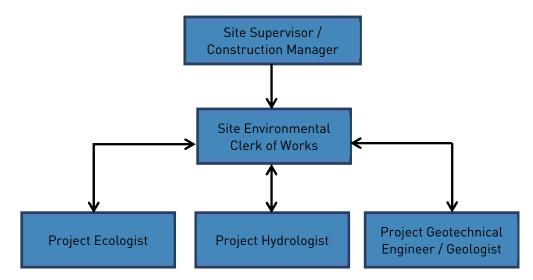
4 ENVIRONMENTAL MANAGEMENT IMPLEMENTATION

4.1 Roles and Responsibilities

The Site Supervisor/Construction Manager and/or Environmental Clerk of Works (ECoW) are the project focal point relating to construction-related environmental issues.

In general, the ECoW will maintain responsibility for monitoring the works and Contractors/Sub-contractors from an environmental perspective. The ECoW will act as the regulatory interface on environmental matters by reporting to and liaising with Donegal County Council and other statutory bodies as required.

The ECoW will report directly to the Site Supervisor/Wind Farm Construction Manager. A Project Ecologist, Project Hydrologist and Project Geotechnical engineer will visit the site regularly and report to site management. This structure provides a "triple lock" review/interaction by external specialists. An organogram structure for the construction stage is as follows:



Any requirement of favourable planning permission decision, for the works to be supervised by an engineer with professional indemnity insurance, who upon completion of the works, including site stability, shall certify the said works, will be adhered to. Such an engineer will be appointed to oversee and supervise the construction phase of the project.

4.1.1 Wind Farm Construction Manager/Site Supervisor

The Site Supervisor/Construction Manager will have overall responsibility for the organisation and execution of all related environmental activities as appropriate, in accordance with regulatory and project environmental requirements. The duties and responsibilities of the Site Supervisor/Construction Manager will include:

- Ensure that all works are completed safely and with minimal environmental risk.
- Approve and implement the Project CEMP and supporting environmental documentation, and ensure that all environmental standards are achieved during the construction phase of the project;

- Take advice from the ECoW on legislation, codes of practice, guidance notes and good environmental working practice relevant to their work;
- Ensure compliance through audits and management site visits;
- Ensure timely notification of environmental incidents; and,
- Ensure that all construction activities are planned and performed such that minimal risk to the environment is introduced.

4.1.2 Site Environmental Clerk of Works

The main contractor will be required to engage a qualified Environmental Engineer, Environmental Scientist, or equivalent, with experience in wind farm construction to fulfil the role of Site Environmental Clerk of Works (ECoW), and to monitor all site works and to ensure that methodologies and mitigation are followed throughout construction to avoid negatively impacting on the receiving environment.

The ECoW will report to the Construction Manager. The responsibilities and duties of the ECoW will include the following:

- Preparation of the CEMP and supporting environmental documentation and review/approval of contractor method statements;
- Undertake inspections and reviews to ensure the works are carried out in compliance with the CEMP;
- Monitor the implementation of the CEMP, particularly all proposed/required Environmental Monitoring;
- Generate environmental reports as required to show environmental data trends and incidents and ensure environmental records are maintained throughout the construction period;
- Advise site management/contractor/sub-contractors on:
 - Prevention of environmental pollution and improvement to existing working methods;
 - o Changes in legislation and legal requirements affecting the environment;
 - Suitability and use of plant, equipment and materials to prevent pollution;
 - Environmentally sound methods of working and systems to identify environmental hazards;
- Ensure proper mitigation measures are initiated and adhered to during the construction phase;
- Liaise with Project Ecologist, Project Hydrologist and Project Geotechnical Engineer to ensure regular site visits and audits/inspections are completed;
- Ensure adequate arrangements are in place for site personnel to identify potential environmental incidents;
- Ensure that details of environmental incidents are communicated in a timely manner to the relevant regulatory authorities, initially by phone and followed up as soon as is practicable by e-mail;
- Support the investigation of incidents of significant, potential or actual environmental damage, and ensure corrective actions are carried out, recommend means to prevent recurrence and communicate incident findings to relevant parties; and,
- Identify environmental training requirements, and arrange relevant training for all levels of site based staff/workers.
- The level, detail and frequency of reporting expected from the ECoW for the Construction Manager, developer's project manager, and any Authorities or other Agencies, will be agreed by all parties prior to commencement of

construction, and may be further adjusted as required during the course of the project.

4.1.3 Project Ecologist

The Project Ecologist will report to the ECoW and is responsible for the protection of sensitive habitats and species encountered during the construction phase of the wind farm. The Project Ecologist will not be full time on site but will visit the site at least once a month during construction.

The responsibilities and duties of the Project Ecologist will include the following:

- Review and input to the final construction phase CEMP in respect of ecological matters;
- In liaison with ECoW, oversee and provide advice on all relevant ecology mitigation measures set out in EIAR;
- Regular inspection and monitoring of the development, through all phases of construction/operation and provide ecological advice as required;
- Carry out ecological monitoring and survey work as may be required by the planning authority.
- Complete a pre-commencement invasive species survey at the site

4.1.4 Project Hydrologist

The Project Hydrologist will report to the ECoW and is responsible for inspection and review of drainage and water quality aspects associated with construction of the wind farm. The Project Hydrologist will not be full time on site but will visit the site at least once a month during construction.

The responsibilities and duties of the Project Hydrologist will include the following:

- Assist in compiling a detailed drainage design before construction commences and attend the site to set out and assist with micro siting of drainage controls.
 This will be completed over several site visits at the start of the construction phase:
- Review and input to the final construction phase CEMP in respect of drainage and water quality management;
- Following the initial stage of drainage construction regular site visits will be required, at least once a month, to complete hydrological and water quality audits and reviews and report any issues noted to the Site Supervisor/Construction Manager; and,
- Complete ongoing inspection and monitoring of the development, particularly in areas of drainage control, through all phases of construction (including pre, during and post construction) and ensure construction is carried out as specified in the EIAR.

4.1.5 Project Geotechnical Engineer / Geologist

The Geotechnical Engineer or Project Geologist will report to the ECoW and is responsible for inspection and review of geotechnical aspects associated with construction of the wind farm. The Geotechnical Engineer will not be full time on site but will visit site at least once a month during construction phase.

The responsibilities and duties of the Geotechnical Engineer or Geologist will include the following:

- Visit site regularly, or at least once a month during the construction phase, to complete geotechnical audits and reviews and report any issues to the Site Supervisor/Construction Manager;
- Ensuring that identified hazards are listed in the Geotechnical Risk Register and that these are subject to ongoing monitoring;
- Set up and review the readings of the peat stability monitoring system and,
- Ongoing inspection and monitoring of the development, particularly in areas of peatland and at the borrow pit areas through all phases of construction (including pre, during and post construction) and ensure construction is carried out as specified in the EIAR.

4.2 Environmental Awareness and Training

4.2.1 Environmental Induction

The Environmental Induction will be integrated into the general site induction on a case by case basis for each member of staff employed on-site depending on their assigned roles and responsibilities on site. Where necessary, the Environmental Induction will as a minimum include:

- A copy of the Environmental Management Site Plans and discussion of the key environmental risks and constraints;
- An outline of the CEMP structure;
- A discussion of the applicable Works Method Statement;
- The roles and responsibilities of staff, including contractors, in relation to environmental management; and,
- An outline of the Environmental Incident Management Procedure.

4.2.2 Toolbox Talks

Tool box talks would be held by the ECoW or Construction Manager at the commencement of each day, or at the commencement of new activities. The aims of the tool box talks are to identify the specific work activities that are scheduled for that day or phase of work. In addition, the necessary work method statements and sub plans would be identified and discussed prior to the commencement of the day's activities.

Site meetings would be held on a regular basis involving all site personnel. The objectives of site meetings is to discuss the coming weeks activities and identify the relevant work method statements and sub plans that will be relevant to that weeks activities. Additionally, any non-compliance identified during the previous week would also be discussed with the aim to reduce the potential of the same non-compliance reoccurring.

5 EMERGENCY RESPONSE PLAN

An Emergency Response Plan (ERP) is presented in this section of the CEMP. It provides details of procedures to be adopted in the event of an emergency in terms of site health and safety and environmental protection.

5.1 Emergency Response Procedure

The Emergency Response Plan (ERP) is presented in this section of the CEMP. It provides details of procedures to be adopted in the event of an emergency. The site ERP includes details on the response required and the responsibilities of all personnel in the event of an emergency. The ERP will require updating and submissions from the contractor/PSCS and suppliers as the project progresses. Where sub-contractors that are contracted on site are governed by their own emergency response procedure a bridging arrangement will be adopted to allow for inclusion of the sub-contractor's ERP within this within this document.

This is a working document that requires updating throughout the various stages of the project.

5.1.1 Roles and Responsibilities

The chain of command during an emergency response sets out who is responsible for coordinating the response. The Site Manager, will lead the emergency response which makes him responsible for activating and coordinating the emergency response procedure. The other site personnel who can be identified at this time who will be delegated responsibilities during the emergency response are presented in Figure 5.1. In a situation where the Site Manager is unavailable or incapable of coordinating the emergency response, the responsibility will be transferred to the next person in the chain of command outlined in Figure 5.1. This will be updated throughout the various stages of the project.

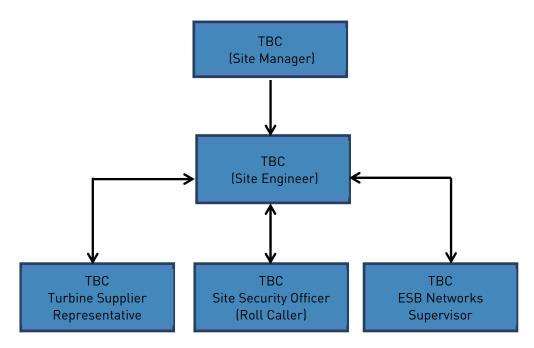


Figure 5.1 Emergency Response Procedure Chain of Command

5.1.2 Initial Steps

In order to establish the type and scale of potential emergencies that may occur, the following hazards have been identified as being potential situations that may require an emergency response in the event of an occurrence.

Table 5.1 Hazards associated with potential emergency situations

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Hazard	Emergency Situation					
Construction Vehicles: Dump trucks, tractors, excavators, cranes etc.	Collision or overturn which has resulted in operator or third-party injury.					
Abrasive wheels/Portable Tools	Entanglement, amputation or electrical shock associated with portable tools					
Contact with services	Electrical shock or gas leak associated with an accidental breach of underground services					
Fire	Injury to operative through exposure to fire					
Falls from heights including falls from scaffold towers, scissor lifts, and ladders	Injury to operative after a fall from a height					
Sickness	Illness unrelated to site activities of an operative e.g. heart attack, loss of consciousness, seizure					

In the event of an emergency situation associated with, but not restricted to, the hazards outlined in Table 5.1 the Site Manager will carry out the following:

- Establish the scale of the emergency situation and identify the number of personnel, if any, have been injured or are at risk of injury.
- Where necessary, sound the emergency siren/fog horn that activates an emergency evacuation on the site. The Site Manager must proceed to the assembly point if the emergency poses any significant threat to their welfare and if there are no injured personnel at the scene that require assistance. The Site Manager will be required to use his own discretion at that point. In the case of fire, the emergency evacuation of the site should proceed, without exception. The site evacuation procedure is outlined in Section 5.1.3.
- Make safe the area if possible and ensure that there is no identifiable risk exists with regard to dealing with the situation e.g. if a machine has turned over, ensure that it is in a safe position so as not to endanger others before assisting the injured.
- Contact the required emergency services or delegate the task to someone if he is unable to do so. If delegating the task, ensure that they follow the procedures for contacting the emergency services as set out in Section 5.3.
- Take any further steps that are deemed necessary to make safe or contain the emergency incident e.g. cordon off an area where an incident associated with electrical issues has occurred.
- Contact any regulatory body or service provider as required e.g. ESB Networks the numbers for which as provided in Section 5.3.2.
- Contact the next of kin of any injured personnel where appropriate. The procedure for this is outlined in Section 5.3.3.

5.1.3 Site Evacuation/Fire Drill

A site evacuation/fire drill procedure will provide basis for carrying out the immediate evacuation of all site personnel in the event of an emergency. The following steps will be taken:

- Notification of the emergency situation. Provision of a siren or fog horn to notify all personnel of an emergency situation.
- An assembly point will be designated in the construction compound area and will be marked with a sign. All site personnel will assemble at this point.
- A roll call will be carried out by the Site Security Officer to account for all personnel on site.
- The Site Security Officer will inform the Site Manager when all personnel have been accounted for. At this time, the Site Manager will decide the next course of action which be determined by the situation that exists at that time. The Site Manager will advise all personnel accordingly.

All personnel will be made aware of the evacuation procedure during site induction. The Fire Services Acts of 1981 and 2003 require the holding of fire safety evacuation drills at specified intervals and the keeping of records of such drills.

5.1.4 Excessive Peat Movement

Where there is excessive peat movement or continuing peat movement recorded at a monitoring location or identified at any location within the site but no apparent signs of distress to the peat (e.g. cracking, surface rippling) then the following shall be carried out.

- 1. All construction activities shall cease within the affected area.
- 2. Increased monitoring at the location shall be carried out. The area will be monitored, as appropriate, until such time as movements have ceased.
- 3. Re-commencement of limited construction activity shall only start following a cessation of movement and the completion of a geotechnical risk assessment by a geotechnical engineer.

5.1.5 Onset of Peat Slide

Where there is the onset or actual detachment of peat (e.g. cracking, surface rippling) then the following shall be carried out.

- 1. On alert of a peat slide incident, all construction activities will cease and all available resources will be diverted to assist in the required mitigation procedures.
- 2. Where considered possible, action will be taken to prevent a peat slide reaching any watercourse. This will take the form of the construction of check barrages on land. Due to the terrain, the possible short run-out length to watercourses, speed of movement and the inability to predict locations it may not be possible to implement any on-land prevention measures, in this case a watercourse check barrage will be implemented.
- 3. For localised peat slides that do not represent a risk to a watercourse and have essentially come to rest, the area will be stabilised initially by rock infill, if required. The failed area and surrounding area will then be assessed by the engineering staff and stabilisation procedures implemented. The area will be monitored, as appropriate, until such time as movements have ceased.

5.1.6 Spill Control Measures

Every effort will be made to prevent an environmental incident during the construction and operational phase of the proposed project. Oil/Fuel spillages are one of the main environmental risks that will exist at the site which will require an emergency response procedure. The importance of a swift and effective response in the event of such an incident occurring cannot be over emphasised. The following steps provide the procedure to be followed in the event of such an incident.

- Stop the source of the spill and raise the alarm to alert people working in the vicinity of any potential dangers.
- If applicable, eliminate any sources of ignition in the immediate vicinity of the incident
- Contain the spill using the spill control materials, track mats or other material as required. Do not spread or flush away the spill.
- If possible, cover or bund off any vulnerable areas where appropriate such as drains, watercourses or sensitive habitats.
- If possible, clean up as much as possible using the spill control materials.
- Contain any used spill control material and dispose of used materials appropriately using a fully licensed waste contractor with the appropriate permits so that further contamination is limited.
- Notify the ECoW immediately giving information on the location, type and extent of the spill so that they can take appropriate action.
- The ECoW will inspect the site and ensure the necessary measures are in place to contain and clean up the spill and prevent further spillage from occurring.
- The ECoW will notify the appropriate regulatory body such as Donegal County Council, Department of Communications, Energy and Natural Resources (DCENR) and Department of Environment, Community and Local Government (DOECLG), if deemed necessary.

Environmental incidents are not limited to just fuel spillages. Therefore, any environmental incident must be investigated in accordance with the following steps.

- The ECoW must be immediately notified.
- If necessary, the ECoW will inform the appropriate regulatory authority. The appropriate regulatory authority will depend on the nature of the incident.
- The details of the incident will be recorded on an Environmental Incident Form which will provide information such as the cause, extent, actions and remedial measures used following the incident. The form will also include any recommendations made to avoid reoccurrence of the incident.
- If the incident has impacted on an ecologically sensitive receptor, such as a sensitive habitat, protected species or designated conservation site (pSPA or cSAC), the ECoW will liaise with the Project Ecologist.
- If the incident has impacted on a sensitive receptor such as an archaeological feature the ECoW will liaise with the Project Archaeologist.
- A record of all environmental incidents will be kept on file by the ECoW and the Main Contractor. These records will be made available to the relevant authorities such as Donegal County Council, DCENR and DOECLG if required.

The ECoW will be responsible for any corrective actions required as a result of the incident e.g. an investigative report, formulation of alternative construction methods or environmental sampling, and will advise the Main Contractor as appropriate.

5.2 Contacting the Emergency Services

5.2.1 Emergency Communications Procedure

In the event of requiring the assistance of the emergency services the following steps should be taken:

Stay calm. It's important to take a deep breath and not get excited. Any situation that requires 999/112 is, by definition, is an emergency. The dispatcher or call-taker knows that and will try to move things along quickly, but under control.

Know the location of the emergency and the number you are calling from. This may be asked and answered a couple of times but don't get frustrated. Even though many emergency call centres have enhanced capabilities meaning they are able to see your location on the computer screen they are still required to confirm the information. If for any reason you are disconnected, at least emergency crews will know where to go and how to call you back.

Wait for the call-taker to ask questions, then answer clearly and calmly. If you are in danger of assault, the dispatcher or call-taker will still need you to answer quietly, mostly "yes" and "no" questions.

If you reach a recording, listen to what it says. If the recording says your call cannot be completed, hang up and try again. If the recording says all call takers are busy, WAIT. When the next call-taker or dispatcher is available to take the call, it will transfer you.

Let the call-taker guide the conversation. He or she is typing the information into a computer and may seem to be taking forever. There's a good chance, however, that emergency services are already being sent while you are still on the line.

Follow all directions. In some cases, the call-taker will give you directions. Listen carefully, follow each step exactly, and *ask for clarification* if you don't understand.

Keep your eyes open. You may be asked to describe victims, suspects, vehicles, or other parts of the scene.

Do not hang up the call until directed to do so by the call taker.

Due to the remoteness of the site it may be necessary to liaise with the emergency services on the ground in terms of locating the site. This may involve providing an escort from a designated meeting point that may be located more easily by the emergency services. This should form part of the site induction to make new personnel and sub-contractors aware of any such arrangement or requirement if applicable.

5.2.2 Contact Details

A list of emergency contacts is presented in Table 5.2. A copy of these contacts will be included in the Site Safety Manual and in the site offices and the various site welfare facilities.

Table 5.2 Emergency Contacts

Contact	Telephone no.
Emergency Services – Ambulance, Fire, Gardaí	999/112
Doctor – Milbrae Surgery Ballybofey	074 913 1023
Hospital – Letterkenny University Hospital	074 912 5888
ESB Emergency Services	1850 372 999
Bord Gáis Emergency	1850 20 50 50
Gardaí –Local Garda Station TBC	TBC
Health and Safety Co-ordinator - Health & Safety Services	TBC
Health and Safety Authority	1890 289 389
Project Supervisor Construction Stage (PSCS): TBC	TBC
Project Supervisor Design Stage (PSDS): McCarthy, Keville, O' Sullivan Ltd.	091 735611
Client -	Planree Ltd

5.2.3 Procedure for Personnel Tracking

All operatives on site without any exception will have undergo a site induction where they will be required to provide personal contact details which will include contact information for the next of kin.

In the event of a site operative becoming in an emergency situation where serious injury has occurred and hospitalisation has taken place, it will be the responsibility of the Site Manager or next in command if unavailable to contact the next of kin to inform them of the situation that exists.

5.3 Induction Checklist

Table 5.3 provides a list of items highlighted in this ERP which must be included or obtained during the mandatory site induction of all personnel that will work on the site. This will be updated throughout the various stages of the project.

Table 5.3 Emergency Response Plan Items Applicable to the Site Induction Process

ERP Items to be included in Site Induction	Status
All personnel will be made aware of the evacuation procedure during site induction	
Due to the remoteness of the site it may be necessary to liaise with and assist the emergency services on the ground in terms of locating the site. This may involve providing an escort from a designated meeting point that may be located more easily by the emergency services. This should form part of the site induction to make new personnel and sub-contractors aware of any such arrangement or requirement if applicable.	
All operatives on site without any exception will have undergo a site induction where they will be required to provide personal contact details which will include contact information for the next of kin.	

6 MITIGATION PROPOSALS

All mitigation measures relating to the pre-commencement, construction and operational phases of the proposed development were set out in the various sections of the Environmental Impact Assessment Report (EIAR) prepared as part of the planning permission application to An Bord Pleanála.

This section of the CEMP groups together all of the mitigation measures presented in the EIAR. The Mitigation Measures are presented in the following pages.

By presenting the mitigation proposals in the below format, it is intended to provide an easy to audit list that can be reviewed and reported on during the future phases of the project. The tabular format in which the below information is presented, can be further expanded upon during the course of future project phases to provide a reporting template for site compliance audits.

Table 7.1 Site preparation and Mitigation Measures

Reference No.	Reference	Mitigation Measure	Audit Result	Action Required		
	Pre-Commencement Phase					
MM1	EIAR Section 7	It is proposed that construction works will commence outside the bird nesting season (1st of April to 31st of July inclusive).				
MM2	EIAR Section 4	The removal and disposal of wastewater from the site will be carried out by a fully permitted waste collector holding valid Waste Collection Permits as issued under the Waste Management (Collection Permit) Regulations, 2007. Information on the appointed permitted contractor and evidence of a maintenance contract will be submitted to the Planning Authority prior to any construction works taking place.				
ММ3	EIAR Section 4	All site activities will be provided for in an Construction Environmental Management Plan, prepared prior to the commencement of any operations onsite. The CEMP will set out all measures necessary to ensure works are carried out in accordance with the mitigation measures set out in the EIAR, and will set out the monitoring and inspections procedures and frequencies.				
MM4	EIAR Section 4 CEMP Section 4	An ECoW will oversee the site works and implementation of the Environmental Management Plan, and provide on-site advice on the mitigation measures as necessary to ensure the project proceeds as intended. The level, detail and frequency of reporting expected from the ECoW for the Construction Manager, developer's project manager, and any Authorities or other Agencies, will be agreed by all parties prior to commencement of construction, and may be further adjusted as required during the course of the project.				
MM5	EIAR Section 4	The arrangements for concrete deliveries to the site will be discussed with suppliers before work starts, agreeing routes, prohibiting on-site washout and discussing emergency procedures.				

Reference No.	Reference	Mitigation Measure	Audit Result	Action Required
MM6	EIAR Section 4 CEMP Section 3	Drainage swales will be installed in advance of any construction works commencing.		
ММ7	EIAR Section 4 CEMP Section 2	Borrow pits will be secured with stock proof fencing to prevent access to these areas. Appropriate health and safety signage will be erected on the fencing prior to construction works commencing.		
MM8	EIAR Section 4 CEMP Section 2	Culverts will be installed at locations where streams or natural drainage channels cross the new access track route. All works involving culverts, whether they are new, upgraded or extended, will be carried out to follow a method statement to be agreed with Inland Fisheries Ireland.		
MM9	EIAR Section 4 CEMP Section 3	All materials and equipment necessary to implement the drainage mitigation measures will be brought on-site in advance of any works commencing. The drainage measures outlined in the EIAR will be installed prior to, or at the same time as the works they are intended to drain. An adequate amount of straw bales, clean stone, terram, stakes, etc. will be kept on site at all times to implement the drainage design measures as necessary.		
MM10	EIAR Section 4 CEMP Section 3	The works programme for the ground works part of the construction phase of the project will also take account of weather forecasts, and predicted rainfall in particular.		
MM11	EIAR Section 4 CEMP Section 3, 7	The effectiveness of drainage measures designed to minimise runoff entering works areas and capture and treat silt-laden water from the works areas, will be monitored as part of the water quality and monitoring programme set out in Section 7 of the CEMP. The ECoW or supervising hydrologist will respond to changing weather, ground or drainage conditions on the ground as the project proceeds, to ensure the effectiveness of the		

Reference No.	Reference	Mitigation Measure	Audit Result	Action Required
		drainage design is maintained in so far as is possible. This may require the installation of additional check dams, interceptor drains or swales as deemed necessary on-site.		
MM12	EIAR Section 4 CEMP Section 7	An inspection and maintenance plan for the drainage system on site will be prepared in advance of commencement of any works. Regular inspections of all installed drainage systems will be necessary, especially after heavy rainfall, to check for blockages, and ensure there is no build-up of standing water at parts of the systems where it is not intended. The inspection of the drainage system will be the responsibility of the ECoW or the supervising hydrologist.		
MM13	EIAR Section 9 CEMP Section 3	A 50-metre buffer zone will be maintained around watercourses during the windfarm construction. With the exception of road crossings of streams and associated culvert construction, no development infrastructure, vehicle or plant movement, construction activity or stock-piling of construction materials or construction waste will take place within this zone, and no vegetation will be removed from within this zone.		
MM14	EIAR Section 9 CEMP Section 3	A 20-metre buffer zone will be maintained around existing artificial drainage points for the duration of the construction phase.		
MM15	EIAR Section 7	No felling of conifers, individual trees or bushes will be carried out during the general bird breeding season. (the 1st of April to the 31st of July inclusive).		
MM16	EIAR Section 6	An Invasive Species Management Plan will be developed following a preconstruction invasive survey. The report will describe the best practice measures that will be followed to ensure that works associated with the permitted wind farm development do not result in the spread or proliferation of invasive species.		

Reference No.	Reference	Mitigation Measure	Audit Result	Action Required
MM17	EIAR Section 6	A pre-construction mammal survey will be undertaken to identify evidence of protected mammals within the works areas associated with the proposed development.		
MM18	EIAR Section 14	A pre-condition survey of roads associated with the proposed development will be carried out prior to commencement of construction activities.		
MM19	EIAR Section 4 CEMP Section 9	The procedures for the implementation of the mitigation measures outlined in such an CEMP and their effectiveness and completion is typically audited by way of an Environmental Management Plan Audit Report. The CEMP Audit Report effectively lists all mitigation measures prescribed in any of the planning documentation, all conditions attached to the grant of planning permission and any further mitigation measures proposed during the detailed design stage, and allows them to be audited on a systematic and regular basis.		
		Construction Phase		
Constructio	n Management			
	IAR Section 4 EMP Section 3	On-site refuelling will be carried out at dedicated refuelling locations using a mobile double skinned fuel bowser. The fuel bowser, a double-axel custom-built refuelling trailer will be re-filled off site, and will be towed around the site by a 4x4 jeep to where machinery is located. It is not practical for all vehicles to travel back to a single refuelling point, given the size of the cranes, excavators, etc. that will be used during the construction of the permitted wind farm development. The 4x4 jeep will also carry fuel absorbent material and pads in the event of any accidental spillages. The fuel bowser will be parked on a level area in the construction when not in use. Only designated trained and competent operatives will be authorised to refuel plant on site. Mobile measures such as drip trays, spill kits and fuel absorbent mats will be used during all refuelling operations.		

Referenc No.	e Reference	Mitigation Measure	Audit Result	Action Required
MM21	EIAR Section 4	No batching of wet-cement products will occur on site. Ready-mixed supply of wet concrete products and where possible, emplacement of pre-cast elements, will take place. Only ready-mixed concrete will be used during the construction phase, with all ready-mixed concrete being delivered from local batching plants in sealed concrete delivery trucks.		
MM22	EIAR Section 4	No washing out of any plant used in concrete transport or concreting operations will be carried out onsite. When concrete is delivered to site, only the chute of the delivery truck will be cleaned, using the smallest volume of water necessary, before leaving the site. Concrete trucks will be directed back to their batching plant for washout.		
MM23	EIAR Section 4	No concrete will be transported around the site in open trailers or dumpers so as to avoid spillage while in transport.		
MM24	EIAR Section 4	Clearly visible signs in prominent locations will be placed close to concrete pour areas specifically stating washout of concrete lorries is not permitted on the site.		
MM25	EIAR Section 4	All concrete used in the construction of turbine bases will be poured directly into the shuttered formwork from the delivery truck. If this is not practical, the concrete will be poured from the delivery truck into a hydraulic concrete pump or into the bucket of an excavator, which will transfer the concrete to the location where it is needed.		
MM26	EIAR Section 4	Main pours will be planned days or weeks in advance. Large pours will be avoided when prolonged periods of heavy rain are forecast.		
MM27	EIAR Section 4	Concrete pumps and machine buckets will be restricted from slewing over watercourses while placing concrete.		

Reference No.	e Reference	Mitigation Measure	Audit Result	Action Required
MM28	EIAR Section 4	Excavations will be sufficiently dewatered before concreting begins. Dewatering will continue while concrete sets.		
MM29	EIAR Section 4	Covers will be available for freshly placed concrete to avoid the surface washing away in heavy rain.		
MM30	EIAR Section 4	Surplus concrete after completion of a pour will be used elsewhere at suitable locations around the site where it is required.		
MM31	EIAR Section 4 CEMP Section 3	If necessary, water will be taken from settlement ponds in the site's drainage system, and will be pumped into a bowser or water spreader to dampen down haul roads and site compounds to prevent the generation of dust. Silty or oily water will not be used for dust suppression.		
MM32	CEMP Section 3	All construction related traffic will have speed restrictions on un-surfaced roads to 20 kph.		
MM33	EIAR Section 4	A road sweeper will be available if any section of the public roads were to be dirtied by trucks associated with the proposed development.		
MM34	EIAR Section 4	During construction of the proposed development, all staff will be made aware of and adhere to the Health & Safety Authority's 'Guidelines on the Procurement, Design and Management Requirements of the Safety, Health and Welfare at Work (Construction) Regulations 2006'. This will encompass the use of all necessary Personal Protective Equipment and adherence to the site Health and Safety Plan.		
MM35	EIAR Section 4	Any area where excavations are planned will be surveyed and all existing services will be identified prior to commencement of any works. Liaison will be held with the relevant sections of the Local Authority including all the relevant area engineers to ensure all		

Reference No.	e Reference	Mitigation Measure	Audit Result	Action Required
		services are identified. Excavation permits will be completed and all plant operators and general operatives will be inducted and informed as to the location of any services.		
Drainage	Design and Manag	gement		
MM36	EIAR Section 4 CEMP Section 3	Swales will be used to intercept and collect run off from construction areas of the site during the construction phase, and channel it to stilling ponds for sediment attenuation.		
MM37	EIAR Section 4 CEMP Section 3	Interceptor drains will be installed upgradient of any works areas to collect surface flow runoff and prevent it reaching excavations and construction areas of the site. It will then be directed to areas where it can be re-distributed over the ground as sheet flow.		
MM38	EIAR Section 4 CEMP Section 3	Check dams will not be used in any natural watercourses, only artificial drainage channels and interceptor drains. The check dams will be left in place when the interceptor drains are backfilled at the end of the construction phase to limit linear flow in the backfilled drain. The check dams will be installed at regular intervals along interceptor drains to restrict flow velocity, minimise channel erosion and promote sedimentation behind the dam. The check dams will be installed as the interceptor drains are being excavated. The spacing and frequency of the check dams will be dependent on the gradient of the interceptor drain or swale in which they are being installed.		
MM39	EIAR Section 4 CEMP Section 3	A level spreader will be constructed at the end of each interceptor drain to convert concentrated flows in the drain into diffuse sheet flow on areas of vegetated ground. The levels spreaders will be located downgradient of any works areas in locations where they are not likely to contribute further to water ingress to construction areas of the site. They will also be emplaced at end of swales carrying discharge from settlement ponds. The level spreaders will distribute clean drainage water onto vegetated areas where the water will not be reconcentrated into a flow channel immediately below the point of discharge. The discharge point will be on level or only very gently sloping ground rather than on a steep slope so as to prevent erosion. No drains will discharge directly to surface waters.		

Reference No.	e Reference	Mitigation Measure	Audit Result	Action Required
MM40	EIAR Section 4 CEMP Section 3	Piped slope drains will be used to convey surface runoff from diversion drains safely down slopes to flat areas without causing erosion. Once the runoff reaches the flat areas it will be reconverted to diffuse sheet flow. Level spreaders will only be established on slopes of less than 6% in grade. Piped slope drains will be used to transfer water away from areas where slopes are too steep to use level spreaders. Piped slope drains will only remain in place for the duration of the construction phase of the project. On completion of the works, the pipes and rock aprons will be removed and all channels backfilled with the material that was originally excavated from them.		
MM41	EIAR Section 4 CEMP Section 3	Vegetation filters, that is areas of existing vegetation, accepting drainage water issuing from level spreaders as sheet flow, will remove any suspended sediment from water channelled via interceptor drains or any remaining sediment in waters channelled via swales and stilling ponds.		
MM42	EIAR Section 4 CEMP Section 3	Stilling ponds will be used to attenuate runoff from works areas of the site during the construction phase, and will remain in place to handle runoff from roads and hardstanding areas of the proposed development during the operational phase. Stilling ponds will be excavated/constructed at each required location as two separate ponds in sequence, a primary pond and a secondary pond. The stilling ponds will be sized according to the size of the area they will be receiving water from, but will be sufficiently large to accommodate peak flows storm events. The stilling ponds will be dimensioned so that the length to width ratio will be greater than 2:1, where the length is the distance between the inlet and the outlet. Where ground conditions allow, stilling ponds will be constructed in a wedge shape, with the inlet located at the narrow end of the wedge. Each stilling pond will be a minimum of 1-1.5 metres in depth. Deeper ponds will be used to minimise the excavation area needed for the required volume. The embankment that forms the sloped sides of the stilling ponds will be stabilised with vegetated turves, which will have been removed during the excavation of the stilling ponds area.		

Referenc No.	e Reference	Mitigation Measure	Audit Result	Action Required
MM43	EIAR Section 4 CEMP Section 3	A siltbuster or similar equivalent piece of equipment will be available if required to filter any water pumped out of excavation areas, prior to its discharge to settlement ponds or swales. This includes turbine base excavations and borrow bit excavations. This water is likely to have a high sediment load and will be directed via swales to settlement ponds after treatment in the unit.		
MM44	EIAR Section 4 CEMP Section 3	Culverts will be installed at locations where streams or natural drainage channels cross the new access track route. All works involving culverts, whether they are new, upgraded or extended, will be carried out to follow a method statement to be agreed with Inland Fisheries Ireland.		
MM45	EIAR Section 4 EIAR Section 9 CEMP Section 3	Silt fences will be installed along the routes of existing watercourses or drainage ditches where site roads pass over the watercourses, immediately downstream of the construction area. Silt fences will be installed along a level contour so water does not pond more than 400 mm at any point. The silt fence will be trenched at least 100 mm into the ground and will be stretched tight between the posts. The fences will not be allowed to sag or break away from the fence posts. Silt fences will be installed as single, double or a series of triple silt fences, depending on the space available and the anticipated sediment loading. During the near stream construction work double silt fences will be emplaced immediately down-gradient of the construction area for the duration of the construction phase.		
MM46	EIAR Section 9 CEMP Section 3	Mitigation measures which will reduce the risk of entrainment of suspended solids and nutrient release in surface watercourses comprise best practice methods which are set out above in Section 3.4.		
MM47	EIAR Section 4 CEMP Section 3	The works programme for the groundworks part of the construction phase of the project will also take account of weather forecasts, and predicted rainfall in particular.		
MM48	EIAR Section 4	The effectiveness of drainage measures designed to minimise runoff entering works areas and capture and treat silt-laden water from the works areas, will be monitored		

Reference No.	e Reference	Mitigation Measure	Audit Result	Action Required	
	CEMP Section 3, 4 & 7	continuously by the ECoW or supervising hydrologist on-site. The ECoW or supervising hydrologist will respond to changing weather, ground or drainage conditions on the ground as the project proceeds, to ensure the effectiveness of the drainage design is maintained in so far as is possible. This may require the installation of additional check dams, interceptor drains or swales as deemed necessary on-site.			
MM49	EIAR Section 4	Material excavated to create the working area will be stored locally for later reuse in backfilling the working area around the turbine foundation. The excavated material will be covered with polythene sheets and surrounded by silt fences to ensure sediment-laden run-off does not occur.			
Flora and Fauna					
MM50	EIAR Section 9 CEMP Section 3	Best practice Forestry Service Guideline mitigation measures will reduce the risk of entrainment of suspended solids and nutrient release in surface watercourses as outlined in the EIAR.			
Peat, Subsoils and Bedrock					
MM51	CEMP Section 3	General recommendation for good construction practice to minimise the risk of construction activity causing potential peat instability are outlined in Section 3.6 of the CEMP.			
MM52	EIAR Section 8	Peat removed from turbine locations will be transported to the designated borrow pit areas.			
MM53	EIAR Section 8	Any excess mounded peat in temporary placement areas for long periods will be digger-bucket sealed and covered with polyethylene sheets or reseeded at the earliest opportunity.			

Reference No.	Reference	Mitigation Measure	Audit Result	Action Required
MM54	EIAR Section 8	In order to minimise runoff during the construction phase, stripping of peat should not take place during excessively dry weather (to prevent dust generation) or extremely wet periods (to prevent increased silt rich runoff).		
MM55	EIAR Section 9	Brash mats will be used where necessary to support vehicles on soft ground, reducing peat and mineral soils erosion and avoiding the formation of rutted areas, in which surface water ponding can occur. Brash mat renewal should take place when they become heavily used and worn. Provision should be made for brash mats along all off-road routes, to protect the soil from compaction and rutting.		
MM56	EIAR Section 8 CEMP Section 3	 The following issues incorporated into the construction phase of the project will assist in the management of the risks for this site (AGEC, 2017): Appointment of experienced and competent contractors; The site should be supervised by experienced and qualified personnel; Allocate sufficient time for the project (be aware that decreasing the construction time has the potential to increase the risk of initiating a peat movement); Prevent undercutting of slopes and unsupported excavations; Maintain a managed robust drainage system; Prevent placement of loads/overburden on marginal ground; Set up, maintain and report findings from monitoring systems; Ensure construction method statements are followed or where agreed modified/developed; and, Revise and amend the Geotechnical Risk Register as construction progresses. 		
Air Quality/Dust				
MM57	EIAR Section 4	 Revise and amend the Geotechnical Risk Register as construction progresses. Truck wheels will be washed to remove mud and dirt before leaving the site. All plant and materials vehicles shall be stored in the dedicated compound area. 		

Reference No.	Reference	Mitigation Measure	Audit Result	Action Required
	CEMP Section 3 EIAR Section 10	 Areas of excavation will be kept to a minimum, and stockpiling will be minimised by coordinating excavation, spreading and compaction. Construction traffic will be restricted to defined routes and a speed limit will be implemented. Water misting or bowsers will operate on-site as required to mitigate dust in dry weather conditions. The transport of soils or other material, which has significant potential to cause dust, will be undertaken in tarpaulin-covered vehicles where necessary. The agreed haul route roads adjacent to the site will be regularly inspected for cleanliness, and cleaned as necessary. 		
MM58	EIAR Section 10	All construction machinery will be maintained in good operational order while on-site, minimising any emissions that are likely to arise.		
MM59	EIAR Section 10	In periods of extended dry weather, dust suppression may be necessary along haul roads and around the borrow pit area to ensure dust does not cause a nuisance. If necessary, water will be taken from stilling ponds in the site's drainage system, and will be pumped into a bowser or water spreader to dampen down haul roads and site compounds to prevent the generation of dust. Silty or oily water will not be used for dust suppression, because this would transfer the pollutants to the haul roads and generate polluted runoff or more dust. Water bowser movements will be carefully monitored, as the application of too much water may lead to increased runoff.		
Noise				
MM60	EIAR Section 4 & 11	Equipment will be sensitively located, taking account of local topography and natural screening.		

Reference No.	Reference	Mitigation Measure	Audit Result	Action Required
MM61	EIAR Section 4 & 11	All construction work will be restricted to the specified working hours. Any construction work carried out outside of these hours shall be restricted to activities that will not generate noise of a level that may cause a nuisance.		
MM62	EIAR Section 4 & 11	Plant will be selected taking account of the characteristics of noise emissions from each item. All plant and machinery used on the site shall comply with E.U. and Irish legislation in relation to noise emissions. The timing of on- and off-site movements of plant near occupied properties will be controlled.		
MM63	EIAR Section 11	 The contract documents will clearly specify that the Contractor undertaking the construction of the works will be obliged to adhere to the following noise abatement measures: No plant used on site will be permitted to cause an on-going public nuisance due to noise. The best means practicable, including proper maintenance of plant, will be employed to minimise the noise produced by on site operations. All vehicles and mechanical plant will be fitted with effective exhaust silencers and maintained in good working order for the duration of the contract. Compressors will be attenuated models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use and all ancillary pneumatic tools shall be fitted with suitable silencers. Machinery that is used intermittently will be shut down or throttled back to a minimum during periods when not in use. Any plant, such as generators or pumps, which is required to operate near any sensitive receptors before 07:00hrs or after 19:00hrs will be surrounded by an acoustic enclosure or portable screen. Diesel generators will be enclosed in sound proofed containers to minimise the potential for noise impacts. 		

Reference No.	Reference	Mitigation Measure	Audit Result	Action Required
		 Residents will be notified in advance of all blasting schedules. During the course of the construction programme, supervision of the works will include ensuring compliance with the limits detailed in Error! Reference source not found. using methods outlined in British Standard BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Noise. 		
MM64	EIAR Section	 The following mitigation measures will be employed to control the impact of vibration during blasting activities: Trial blasts will be undertaken to obtain scaled distance analysis; Appropriate burden to avoid over or under confinement of the charge; Accurate setting out and drilling; Appropriate charging; Appropriate stemming with appropriate material such as sized gravel or stone chipping; Delay detonation to ensure small maximum instantaneous charges; Decked charges and in-hole delays; Blast monitoring to enable adjustment of subsequent charges; Good blast design to maximise efficiency and reduce vibration; Avoid using exposed detonating cord on the surface; and During the course of the construction programme, supervision of the works will include ensuring compliance with the limits detailed in Table 11-2. 		
MM65	EIAR Section 4, 10 & 11	All construction operations shall comply with guidelines set out in British Standard documents 'BS 5338: Code of Practice for Noise Control on Construction and Demolition Sites' and 'BS5228: Part 1: 1997: Noise & Vibration Control on Construction and Open Sites'.		

Reference No.	Reference	Mitigation Measure	Audit Result	Action Required
Cultural Her	itage			
MM66	EIAR Section 13	Archaeological monitoring of ground works (to include roads, substation, turbine hardstands, bases and cable trenching) will be undertaken at the construction phase of the development.		
MM67	EIAR Section 13	DG085-005 Site of Megalithic Structure – The excavation of the grid connection route at this location should be archaeologically monitored during construction. This is in order to ensure that no damage takes place to any sub-surface archaeological features relating to the recorded monument that may be present beneath the surface of the road. A report on the monitoring will be undertaken and submitted to the relevant authorities on completion of the work.		
MM68	EIAR Section 13	40909424 Road Bridge - Archaeological monitoring of ground works during construction where they extend past the road bridge. A report on the results of the monitoring will be compiled and submitted to the relevant authorities on completion of the work.		
MM69	EIAR Section 13	40909423 Milestone - Archaeological monitoring of ground works during construction where they extend past the monument. A report on the results of the monitoring will be compiled and submitted to the relevant authorities on completion of the work.		
Traffic				
MM70	EIAR Section 14	All of the deliveries comprising abnormally large loads will be made outside the normal peak traffic periods to avoid disruption to work and school related traffic.		
MM71	EIAR Section 14	A programme of deliveries will be submitted to Donegal County Council in advance of deliveries of turbine components to site.		

Reference No.	Reference	Mitigation Measure	Audit Result	Action Required
		Operational Phase		
MM72	EIAR Section 4	The removal and disposal of wastewater from the site will be carried out by a fully permitted waste collector holding valid Waste Collection Permits as issued under the Waste Management (Collection Permit) Regulations, 2007. Information on the appointed permitted contractor and evidence of a maintenance contract having been submitted to the Planning Authority prior to any construction works taking place.		

7 MONITORING PROPOSALS

All monitoring proposals relating to the pre-commencement, construction and operational phases of the proposed development were set out in various sections of the EIAR prepared as part of the planning permission application to An Bord Pleanála.

This section of the Construction and Environment Management Plan groups together all of the monitoring proposals presented in the EIAR. The monitoring proposals are presented in the following pages.

By presenting the monitoring proposals in the below format, it is intended to provide an easy to audit list that can be reviewed and reported on during the future phases of the project. The tabular format in which the below information is presented, can be further expanded upon during the course of future project phases to provide a reporting template for site compliance audits.

Table 8.1 Schedule of Monitoring Measures

Ref. No.	Reference	Survey/Monitoring Measure	Frequency	Reporting Measures	Responsibility	
Pre-C	ommencemei	nt Phase				
MX1	EIAR Section 9	An inspection and maintenance plan for the on-site drainage system will be prepared in advance of commencement of any works.	On going	Monthly	ECoW	
MX2	EIAR Section 9	Water sampling will be completed before, during and after the felling activity. The 'before' sampling should be conducted within 4 weeks of the felling activity, preferably in medium to high water flow conditions.	As Required	Monthly	Project Hydrologist	
МХЗ	EIAR Section 13	Pre-construction archaeological testing of all turbine bases, hardstands, substation site, site compound, borrow pits and new roads will take place. A report on the archaeological testing will be submitted to the planning authority and the Department of Arts Heritage and the Gaeltacht.	Once	As required	Project Archaeologist	
MX4	EIAR Section 7	Where construction works run into the subsequent breeding season following commencement, pre-construction bird surveys will be undertaken to confirm the absence of breeding Hen Harrier. If breeding activity is identified, the nest site will be located and no works shall be undertaken within a 500m buffer. No works within the buffer zone shall be permitted until it can be demonstrated that that Hen Harrier are no longer reliant on the nest site.	As required	As required	Project Ornithologist	
Const	Construction Phase					
MX5	EIAR Section 9	Daily monitoring of excavations by a suitably qualified person will occur during the construction phase. If high levels of seepage inflow occur, excavation work should immediately be stopped and a geotechnical assessment undertaken.	Daily	As required	ECoW	
MX6	CEMP Section 3	Haul route will be condition monitored and maintained if necessary.	As required	As required	ECoW	

Ref.	Reference	Survey/Monitoring Measure	Frequency	Reporting Measures	Responsibility
MX7	EIAR Section 4	A system of peat monitoring will be implemented under the supervision of the project geotechnical engineer. This will include movement monitoring posts the findings of which will be reviewed by the geotechnical engineer.	Monthly or more frequently as required by construction programme	Monthly	Project Geotechnical Engineer
MX8	EIAR Section 4	Check dams will be inspected and maintained regularly to insure adequate performance. Maintenance checks will also ensure the centre elevation of the dam remains lower than the sides of the dam.	As Required	As Necessary	ECoW
MX9	EIAR Section 4	Piped slope drains will be inspected weekly and following rainfall events. Inlet and outlets will be checked for sediment accumulation and blockages. Stake anchors or fill over the pipe will be checked for settlement, cracking and stability. Any seepage holes where pipe emerges from drain at the top of the pipe will be repaired promptly.	Weekly	As Necessary	ECoW
MX10	EIAR Section 4	Inspection and maintenance of all stilling ponds will be ongoing through the construction period. A water level indicator such as a staff gauge will be installed in each stilling pond with marks to identify when sediment is at 10% of the settlement pond capacity. Sediment will be cleaned out of the still pond when it exceeds 10% of pond capacity.	As Required	As Necessary	ECoW
MX11	EIAR Section 4	All culverts will be inspected regularly to ensure they are not blocked by debris, vegetation or any other material that may impede conveyance.	Weekly / Monthly	As Necessary	ECoW
MX12	EIAR Section 4 CEMP Section 3	The effectiveness of drainage measures designed to minimise runoff entering works areas and capture and treat silt-laden water from the works areas, will be monitored continuously by the ECoW or supervising hydrologist on-site. The ECoW or supervising hydrologist will respond to changing weather, ground or	As Required	As Necessary	ECoW / Project Hydrologist

Ref.	Reference	Survey/Monitoring Measure	Frequency	Reporting Measures	Responsibility
		drainage conditions on the ground as the project proceeds, to ensure the effectiveness of the drainage design is maintained in so far as is possible. This may require the installation of additional check dams, interceptor drains or swales as deemed necessary on-site.			
MX13	EIAR Section 8, 9 CEMP Section 3	The plant used should be regularly inspected for leaks and fitness for purpose.	Daily	As Necessary	Plant Operators / ECoW
MX14	EIAR Section 9	Drains and silt traps will be maintained throughout all felling works, ensuring that they are clear of sediment build-up and are not severely eroded. Correct drain alignment, spacing and depth will ensure that erosion and sediment build-up are minimised and controlled.	Weekly/ Monthly	As Necessary	ECoW
MX15	EIAR Section 9	Regular inspections of all installed drainage systems will be undertaken, especially after heavy rainfall, to check for blockages, and ensure there is no build-up of standing water in parts of the systems where it is not intended. Inspections will also be undertaken after tree felling.	Weekly Monthly	As Necessary	ECoW
MX16	EIAR Section 9	During the construction phase field testing and laboratory analysis of a range of parameters with relevant regulatory limits and EQSs should be undertaken for each primary watercourse, and specifically following heavy rainfall events (i.e. weekly, monthly and event based).	Weekly, monthly & event based	As Necessary	ECoW / Project Hydrologist
MX17	EIAR Section 9	Sampling will be completed before, during and after the felling activity. The "during" sampling will be undertaken once a week or after rainfall events. The 'after' sampling should comprise as many samplings as necessary to demonstrate that water quality has returned to pre-activity status (i.e. where an impact has been shown).	As Required	Monthly	ECoW / Project Hydrologist

Ref. No.	Reference	Survey/Monitoring Measure	Frequency	Reporting Measures	Responsibility
MX18	EIAR Section 5 CEMP Section 3	Training and supervision of drivers to ensure smooth machinery operation/driving, and to minimise unnecessary noise generation.	As Required	As Necessary	ECoW
MX19	CEMP Section 3	Daily inspection of construction sites to examine dust measures and their effectiveness.	Daily	As Necessary	ECoW
MX20	EIAR Section 13	Archaeological monitoring of ground works during construction.	As Required	As Required	Project Archaeologist
MX21	EIAR Section 6	A detailed habitat enhancement management plan (HEMP) will be prepared for all areas that are subject to restoration. Ongoing monitoring to assess the effectiveness of the measures proposed and employed during habitat replacement. The monitoring measures will include vegetation sampling and hydrological monitoring. The finalized	As Required	Years 1, 2, 3, 5, 10, 15 and 25 following commencem ent of the plan.	Project Ecologist
Operat	ional Phase				
MX22	EIAR Section 7	To take account of both short-term and long-term effects on bird populations, post-construction monitoring should be conducted during the bird breeding season in years 1, 2, 3, 4, 5, 10 and 15 of the life of a wind farm. Ideally, post-construction monitoring will include ongoing breeding bird/activity surveys and a programme of regular corpse searching (at least as regularly as once per month) at the wind turbine sites in the same years to find the corpses of birds and bats that may be struck by the operating turbines.	Years 1, 2, 3, 4, 5, 10 and 15 for the period April - July	Annually at the end of years where surveys are completed	Project Ecologist
MX23	EIAR Section 7	Hen Harrier Roost Surveys	Years 1, 2, 3, 4, 5, 10 and 15 for the period	Annually at the end of years where	Project Ecologist

Ref. No.	Reference	Survey/Monitoring Measure	Frequency	Reporting Measures	Responsibility
			October – March	surveys are completed	
MX24	EIAR Section 7	Autumn Migration/Wintering Birds Survey	Years 1, 2, 3, 4, 5, 10 and 15 for the period September – March	Annually at the end of years where surveys are completed	Project Ecologist
MX25	EIAR Section 7	Corpse Searches (Bird Casualties)	Monthly in years 1, 2, 3, 4, 5, 10 and 15 for the period	Annually at the end of years where surveys are completed	Project Ecologist
MX26	EIAR Section 9	Any excess build-up of silt levels at dams, the settlement pond, or any other drainage features that may decrease the effectiveness of the drainage feature, will be removed. This drainage infrastructure will remain in place until natural vegetation filters have regenerated.	As Required	As Required	ECoW
MX27	EIAR Section 11	Post commissioning operational noise monitoring is recommended to ensure compliance with the relevant planning noise condition.	As Required	As Required	Project Noise Consultant

8 PROGRAMME OF WORKS

The construction phase will take approximately 12-18 months to complete from starting on site to the commissioning of the electrical system and export of electricity from site.

The EIAR stipulated that in the interest of breeding birds, construction would not commence during the breeding bird season, which runs from April to July. The EIAR stipulated that construction may commence between August to the end of March, so that construction activities are ongoing by the time the next breeding bird season comes around, and can continue throughout the next breeding season.

The phasing and scheduling main construction task items are outlined in Figure 8.1 below, where 1st January has been selected as an arbitrary start date for construction activities.

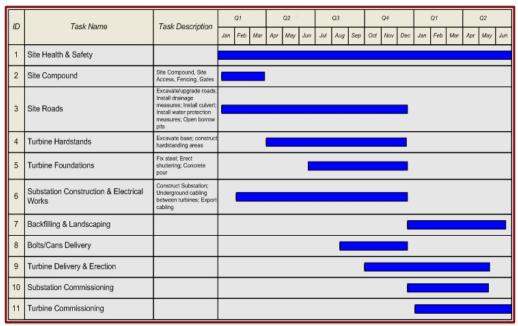


Figure 8.1 Indicative Construction Schedule

9 COMPLIANCE AND REVIEW

9.1 Site Inspections and Environmental Audits

Routine inspections of construction activities will be carried out on a daily and weekly basis by the ECoW and the Construction Manager to ensure all controls to prevent environmental impact, relevant to the construction activities taking place at the time, are in place.

Environmental inspections will ensure that the works are undertaken in compliance with this CEMP and all other planning application documents. Only suitably trained staff will undertake environmental site inspections.

9.2 Auditing

Environmental audits will be carried out during the construction phase of the project. In contrast to monitoring and inspection activities, audits are designed to shed light on the underlying causes of non-compliance, and not merely detect the non-compliance itself. In addition, audits are the main means by which system and performance improvement opportunities may be identified. Environmental audits will be carried out by contractor staff or alternatively by external personnel acting on their behalf. It is important that an impartial and objective approach is adopted. Environmental audits will be conducted at planned intervals to determine whether the CEMP is being properly implemented and maintained. The results of environmental audits will be provided to project management personnel.

9.3 Environmental Compliance

The following definitions shall apply in relation to the classification of Environmental Occurrences during construction of the wind farm:

Environmental Near Miss: An occurrence which if not controlled or due to its nature could lead to an Environmental Incident.

Environmental Incident: Any occurrence which has potential, due to its scale and nature, to migrate from source and have an environmental impact beyond the site boundary.

Environmental Exceedance Event: An environmental exceedance event occurs when monitoring results indicate that limits for a particular environmental parameter (as indicated in the Environmental Monitoring Programme) has been exceeded.

An exceedance will immediately trigger an investigation into the reason for the exceedance occurring and the application of suitable mitigation where necessary.

Exceedance events can be closed out on achieving a monitoring result below the assigned limit for a particular environmental parameter.

Environmental Non-Compliance: Non-fulfilment of a requirement and includes any deviations from established procedures, programs and other arrangements related to the EMP.

9.4 Corrective Action Procedure

A corrective action is implemented to rectify an environmental problem on-site. Corrective actions will be implemented by the Construction Manager, as advised by the Site ECoW. Corrective actions may be required as a result of the following;

- Environmental Audits;
- Environmental Inspections and Reviews;
- Environmental Monitoring;
- Environmental Incidents; and,
- Environmental Complaints.

A Corrective Action Notice will be used to communicate the details of the action required to the main contractor. A Corrective Action Notice is a form that describes the cause and effect of an environmental problem on site and the recommended corrective action that is required. The Corrective Action Notice, when completed, will include details of close out and follow up actions.

If an environmental problem occurs on site that requires immediate attention direct communications between the Construction Manager and the ECoW will be conducted. This in turn will be passed down to the site staff involved. A Corrective Action Notice will be completed at a later date.

9.5 Construction Phase Plan Review

This CEMP will be updated and reviewed prior to commencement of construction, and also every six months thereafter during the construction phase of the project.