

## Consulting Engineers

Block 10-4,  
Blanchardstown Corporate Park,  
Dublin 15 D15 X98N  
Tel: + 353 (0)1 8030401/6  
Fax: + 353 (0)1 8030409/10

Fairgreen House,  
Fairgreen Road  
Galway H91 AXK8  
Tel: + 353 (0)91 565211  
Fax: + 353 (0)91 565398

Market Square,  
Castlebar,  
Co. Mayo F23 Y427  
Tel: +353 (0)94 9021401  
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4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

**Our ref: 8057-Correspondence**

**Roscommon County Council - Planning, Environment, Roads**  
**Áras an Chontae,**  
**Roscommon**  
**F42 VR98**

**8<sup>th</sup> September 2016**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

Dear Sir/Madam,

Bord na Móna Powergen Ltd. proposes to develop the Derryadd Wind Farm, near Lanesborough, south County Longford.

It is proposed that the Derryadd Wind Farm will be built on cutover and cutaway peatlands, on Derryadd, Derryaroge and Lough Bannow Bogs, within the Moundillon peat production bog group (See Figures 1 and 2, Appendix A, in the enclosed Scoping Report).

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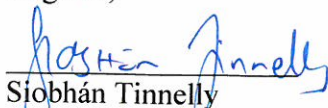
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Regards,

  
Siobhán Tinnelly

Associate Director, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)

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**Department of Communications, Climate Action and Environment  
Elm House, Earlsvale Road  
Cavan  
H12 A8H7**

**8<sup>th</sup> September 2016**

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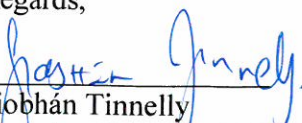
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**Inland Fisheries Ireland  
3044 Lake Drive  
City West  
Dublin 24**

**8<sup>th</sup> September 2016**

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**Geological Survey of Ireland  
Beggars Bush  
Haddington Road  
Dublin 4**

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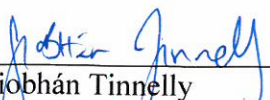
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**Transport Infrastructure Ireland  
St. Martins House, Waterloo Road  
Ballsbridge  
D4**

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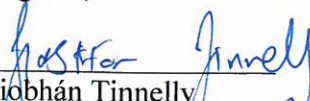
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**Transport Infrastructure Ireland  
Parkgate Business Centre,  
Parkgate St,  
Dublin 8**

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Great Water St.,  
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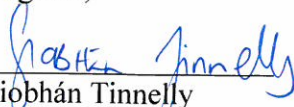
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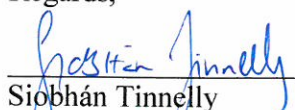
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Block 10-4,  
Blanchardstown Corporate Park,  
Dublin 15 D15 X98N  
Tel: + 353 (0)1 8030401/6  
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Fairgreen House,  
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4th Floor (Suite 1)  
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Email: info@tobin-uk.com

**Our ref: 8057-Correspondence**

**BirdWatch Ireland  
Unit 20, Block D,  
Bullford Business Campus  
Kilcoole, Greystones  
Co. Wicklow  
A63 RW83**

**8<sup>th</sup> September 2016****Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

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Siobhán Tinnelly

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**Teagasc  
Oak Park  
Carlow**

**8<sup>th</sup> September 2016**

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**The Heritage Council**  
**Áras na hOidhreachta**  
**Church Lane**  
**Kilkenny**

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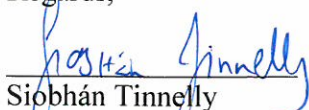
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**Department of Transport, Tourism & Sport  
Leeson Lane  
Dublin 2  
Ireland**

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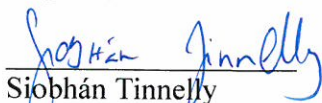
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Golden Eagle Trust Ltd  
22 Fitzwilliam Square  
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**Fáilte Ireland  
Aras Failte  
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88/95 Amiens Street  
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D01WR86**

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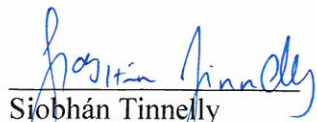
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Eastern Regional Office  
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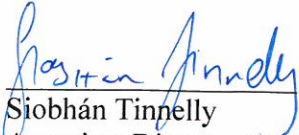
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**Department of Arts, Heritage, Regional,  
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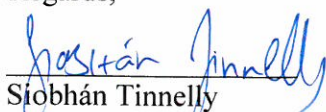
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Email: info@tobin-uk.com

**Our ref: 8057-Correspondence**

**Environmental Protection Agency  
PO 3000  
Johnstown Castle Estate  
Co. Wexford**

**8<sup>th</sup> September 2016**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

Dear Sir/Madam,

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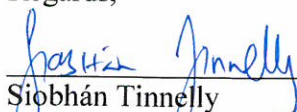
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Regards,



Siobhán Tinnelly

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**National Parks and Wildlife Service  
7 Ely Place  
Dublin 2  
D02 TW98**

**8<sup>th</sup> September 2016**

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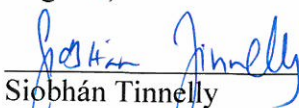
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**Health & Safety Authority  
The Metropolitan Building  
James Joyce Street  
Dublin 1  
D01 K0Y8**

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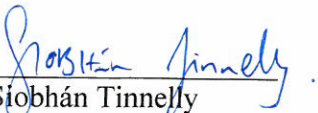
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**Sustainable Energy Authority of Ireland  
Wilton Park House,  
Wilton Pl  
Dublin 2**

**8<sup>th</sup> September 2016**

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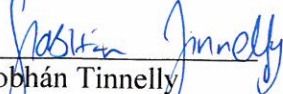
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**Irish Wildlife Trust  
Sigmund Business Centre  
93A Lagan Road, Dublin Industrial Estate  
Glasnevin  
Dublin 11  
D11 EP9P**

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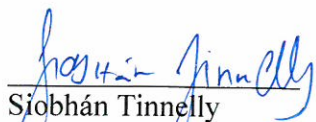
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Bog of Allen Nature Centre  
Lullymore West, Rathangan  
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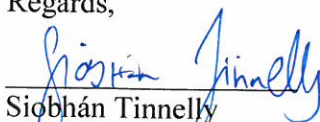
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Galway**

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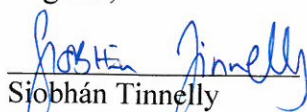
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**Brian O' Connell**  
**HSE Communications Office,**  
**Arden Road, Tullamore,**  
**Co. Offaly**

**21<sup>st</sup> September 2016**

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Block 10-4,  
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Dublin 15 D15 X98N  
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Email: info@tobin-uk.com

*Our ref: 8057-Correspondence*

**ISPCA (Longford office)  
National Animal Centre  
Derryglogher Lodge  
Keenagh  
Co. Longford**

**8<sup>th</sup> September 2016**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

Dear Sir/Madam,

Bord na Móna Powergen Ltd. proposes to develop the Derryadd Wind Farm, near Lanesborough, south County Longford.

It is proposed that the Derryadd Wind Farm will be built on cutover and cutaway peatlands, on Derryadd, Derryaroge and Lough Bannow Bogs, within the Mountdillon peat production bog group (See Figures 1 and 2, Appendix A, in the enclosed Scoping Report).

These bogs cover an area of 2,300 hectares in total, and it is estimated that between 20 and 30 turbines could be located across the proposed wind farm. Due to the size of the proposed Derryadd site and its potential to accommodate an estimated number of up to 30 wind turbines, it is proposed that the project will be initially directed into the preplanning consultation phase with An Bord Pleanála utilising the Strategic Infrastructure Development (SID) process.

Bord na Móna has engaged a team of technical specialists who are in the process of scoping environmental assessments for the proposed development.

We therefore invite you to submit any relevant information that you may hold and/or highlight any issues that you feel should be directed to the project team. Views/comments on the proposed development can be submitted by email, letter or telephone to the contact below no later than the 27<sup>th</sup> of September 2016.

Also, for further information on the project, we welcome you to meet the project team at one of the forthcoming Public Information Events:

- Wednesday 28th September: St Brigids GAA Club, Killashee; 3pm to 9pm
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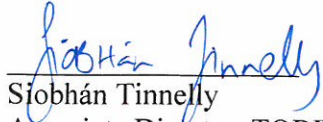
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Regards,



Siobhán Tinnelly

Associate Director, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)

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***Our ref: 8057-Correspondence***

**Bat Conservation Ireland  
Ulex House,  
Drumheel  
Lisduff,  
Virginia  
Co. Cavan**

**8<sup>th</sup> September 2016**

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Dear Sir/Madam,

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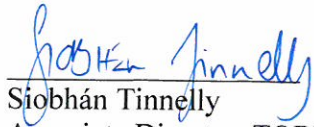
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Regards,



Siobhán Tinnelly

Associate Director, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)

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***Our ref: 8057-Correspondence***

**Department of Agriculture, Marine and Food  
Agriculture House  
Kildare St.  
Dublin 2  
D02 WK12**

**8<sup>th</sup> September 2016**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

Dear Sir/Madam,

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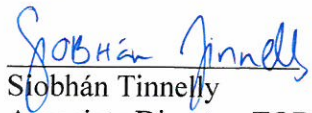
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Co. Reg. No. 42654 – Registered Office: Fairgreen House, Fairgreen Road, Galway, Ireland.



Regards,



Siobhán Tinnelly

Associate Director, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)

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## Consulting Engineers

Block 10-4,  
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Dublin 15 D15 X98N  
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**Our ref: 8057-Correspondence**

**Commission for Energy Regulation  
The Exchange  
Belgard Square North, Tallaght  
Dublin 24**

**8<sup>th</sup> September 2016**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

Dear Sir/Madam,

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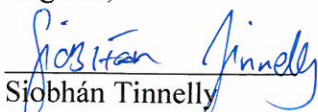
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**Our ref: 8057-Correspondence**

**Midlands Energy Agency  
Comhairle Chontae Laoise  
Áras an Chontae, Portlaoise  
Contae Laoise**

**8<sup>th</sup> September 2016****Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

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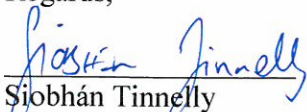
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Siobhán Tinnelly

Associate Director, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)

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**Our ref: 8057-Correspondence**

**Irish Aviation Authority (IAA)**  
**Times Building**  
**11-12 D'oliver Street**  
**Dublin 2**

**8<sup>th</sup> September 2016****Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

Dear Sir/Madam,

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Bord na Móna has engaged a team of technical specialists who are in the process of scoping environmental assessments for the proposed development.

We therefore invite you to submit any relevant information that you may hold and/or highlight any issues that you feel should be directed to the project team. Views/comments on the proposed development can be submitted by email, letter or telephone to the contact below no later than the 27<sup>th</sup> of September 2016.

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**Our ref: 8057-Correspondence (No. 2)**

**Longford County Council – Planning, Environment, Roads  
Great Water St.,  
Longford,  
N39 NH56**

**27<sup>th</sup> April 2017**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford (2<sup>nd</sup> Consultation Letter)**

Dear Sir/Madam,

As per correspondence issued from TOBIN Consulting Engineers in September 2016, Bord na Móna Powergen Ltd. proposes to develop the Derryadd Wind Farm, near Lanesborough, south County Longford.

It is proposed that the Derryadd Wind Farm will be built on cutover and cutaway peatlands on the Derryadd, Derryaroge and Lough Bannow Bogs, within the Mountdillon peat production bog group (See Figure 1 attached).

These bogs cover an area of 2,300 hectares in total, and it is proposed that 28 turbines will be located across the planned wind farm. Due to the size of the proposed Derryadd site and project design, the project team is involved in pre-planning consultation with An Bord Pleanála, utilising the Strategic Infrastructure Development (SID) process.

Bord na Móna has engaged a team of technical specialists who prepared the Scoping Report, included in the September 2016 correspondence, and who are currently completing the environmental assessments for the proposed development. As a result of these assessments, a final turbine layout plan has been designed by the project team and is attached, for your review (Figure 8057\_1004).

We, therefore, invite you to submit any relevant additional information that you may hold and/or highlight any issues that you feel should be directed to the project team. Views/comments on the proposed development can be submitted by email, letter or telephone to the contact below no later than the 19<sup>th</sup> of May 2017.

Also, we are available to meet with representatives of your organisation if you wish to discuss the project and the ongoing assessments in further detail.

Regards,



Siobhán Tinnelly  
Associate Director, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)  
Telephone: 01-8030401, Email: [siobhan.tinnelly@tobin.ie](mailto:siobhan.tinnelly@tobin.ie)

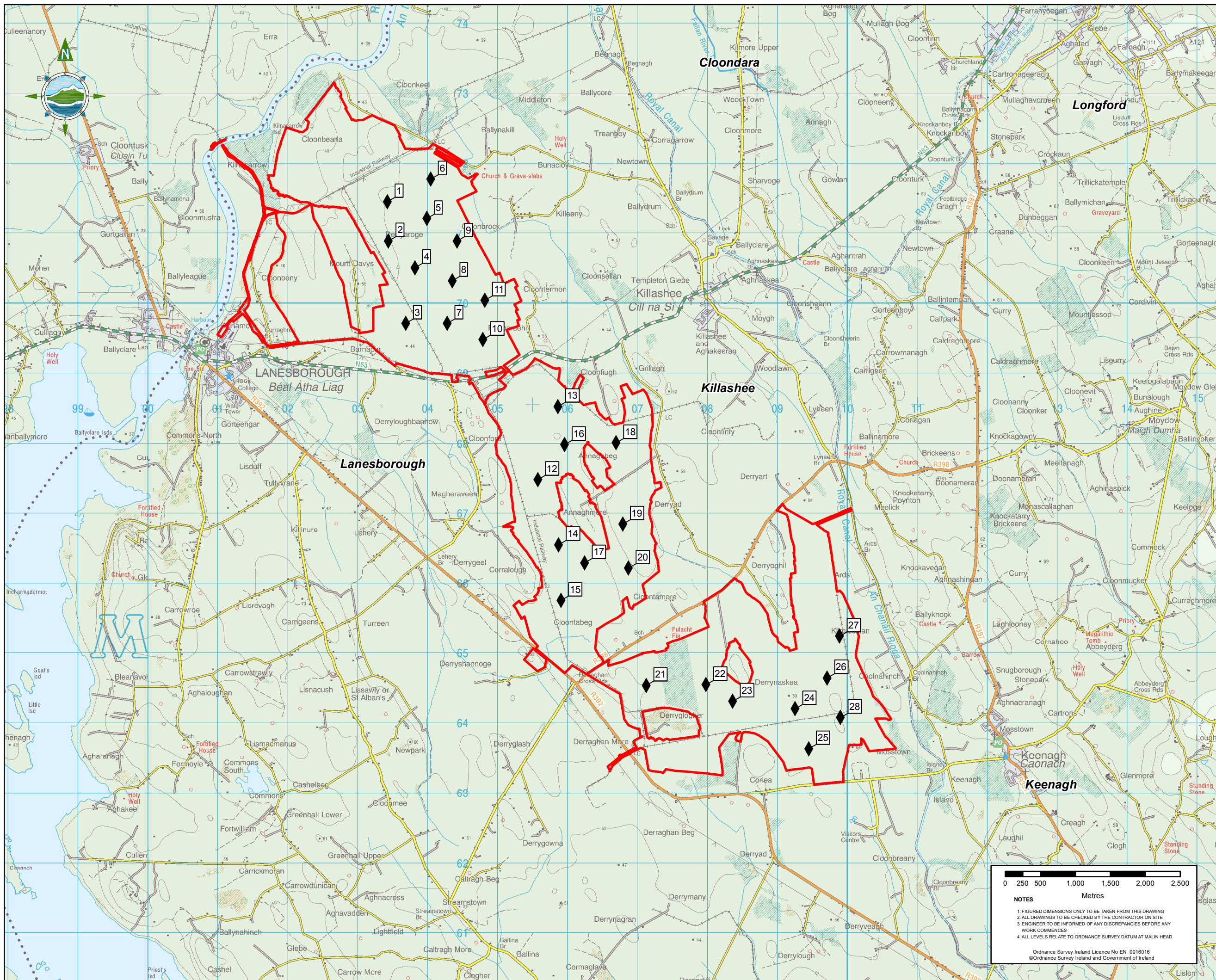
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**Legend**

- Study Area
- Proposed Turbine Locations

D03	APR 2017	Information Issue	MN	ST
Issue	Date	Description	By	Chkd.

D03	APR 2017	Information Issue	MN	ST
Issue	Date	Description	By	Chkd.

Client:  
**BORD NA MÓNA**  
 Naturally Driven

Project:  
**DERRYADD WINDFARM**

Title:  
**SITE LAYOUT**

Scale @ A3: 1:50,000  
 Prepared by: M. Nolan  
 Checked: S. Tinnelly  
 Date: April 2017  
 Project Director: D. Grehan

**TOBIN**  
 Patrick J. Tobin & Co. Ltd.  
 Consulting, Civil and Structural Engineers,  
 Block 10-4, Blanchardstown Corporate Park,  
 Dublin 15, Ireland.  
 tel: +353-(0)1-8030406  
 fax: +353-(0)1-8030409  
 e-mail: info@tobin.ie  
 www.tobin.ie

Issue:  
**D03**  
 8057-1004

0 250 500 1,000 1,500 2,000 2,500  
 Metres

**NOTES**

- FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING
- ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE
- ENGINEER TO BE INFORMED OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES
- ALL LEVELS RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD

Ordnance Survey Ireland Licence No EN 0016016  
 ©Ordnance Survey Ireland and Government of Ireland





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**Our ref: 8057-Correspondence (No. 2)**

**Roscommon County Council - Planning, Environment, Roads**  
**Áras an Chontae,**  
**Roscommon,**  
**F42 VR98**

**27<sup>th</sup> April 2017**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford (2<sup>nd</sup> Consultation Letter)**

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Regards,



Siobhán Tinnelly  
Associate Director, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)  
Telephone: 01-8030401, Email: [siobhan.tinnelly@tobin.ie](mailto:siobhan.tinnelly@tobin.ie)

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Co. Reg. No. 42654 – Registered Office: Fairgreen House, Fairgreen Road, Galway. Ireland.

Block 10-4,  
Blanchardstown Corporate Park,  
Dublin 15 D15 X98N  
Tel: + 353 (0)1 8030401/6  
Fax: + 353 (0)1 8030409/10

Fairgreen House,  
Fairgreen Road,  
Galway H91 AXK8  
Tel: + 353 (0)91 565211  
Fax: + 353 (0)91 565398

Market Square,  
Castlebar,  
Co. Mayo F23 Y427  
Tel: +353 (0)94 9021401  
Fax: +353 (0)94 9021534

4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

*Our ref: 8057-Correspondence (No. 2)*

**Department of Communications, Climate Action and Environment**  
**Elm House,**  
**Earlsvale Road,**  
**Cavan**  
**H12 A8H7**

**27<sup>th</sup> April 2017**

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Castlebar,  
Co. Mayo F23 Y427  
Tel: +353 (0)94 9021401  
Fax: +353 (0)94 9021534

4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

**Our ref: 8057-Correspondence (No. 2)**

**Ms. Gretta Hannigan  
Inland Fisheries Ireland  
3044 Lake Drive  
City West,  
Dublin 24**

**27<sup>th</sup> April 2017**

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4th Floor (Suite 1)  
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**Our ref: 8057-Correspondence (No. 2)**

**Ms. Sophie Preteseille/Monica Lee**  
**Geological Survey of Ireland**  
**Beggars Bush**  
**Haddington Road,**  
**Dublin 4**

**27<sup>th</sup> April 2017**

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Westminster  
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*Our ref: 8057-Correspondence (No. 2)*

**Mr. Vincent O' Malley**  
**Transport Infrastructure Ireland**  
**Parkgate Business Centre**  
**Parkgate Street,**  
**Dublin 8**

**27<sup>th</sup> April 2017**

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**An Taisce  
Tailors Hall  
Backlane,  
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**Our ref: 8057-Correspondence (No. 2)**

**BirdWatch Ireland  
Unit 20, Block D,  
Bullford Business Campus,  
Kilcoole, Greystones  
Co. Wicklow, A63 RW83**

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4th Floor (Suite 1)  
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Tel: +44 20 3713 4370  
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**Our ref: 8057-Correspondence (No. 2)**

**Teagasc  
Oak Park  
Carlow**

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**Our ref: 8057-Correspondence (No. 2)**

**Ms. Allison Harvey**  
**The Heritage Council**  
**Áras na hOidhreachta**  
**Church Lane,**  
**Kilkenny**

**27<sup>th</sup> April 2017**

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**Department of Transport, Tourism & Sport  
Leeson Lane  
Dublin 2,  
Ireland**

**27<sup>th</sup> April 2017**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford (2<sup>nd</sup> Consultation Letter)**

Dear Sir/Madam,

As per correspondence issued from TOBIN Consulting Engineers in September 2016, Bord na Móna Powergen Ltd. proposes to develop the Derryadd Wind Farm, near Lanesborough, south County Longford.

It is proposed that the Derryadd Wind Farm will be built on cutover and cutaway peatlands on the Derryadd, Derryaroge and Lough Bannow Bogs, within the Mountdillon peat production bog group (See Figure 1 attached).

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We, therefore, invite you to submit any relevant additional information that you may hold and/or highlight any issues that you feel should be directed to the project team. Views/comments on the proposed development can be submitted by email, letter or telephone to the contact below no later than the 19<sup>th</sup> of May 2017.

Also, we are available to meet with representatives of your organisation if you wish to discuss the project and the ongoing assessments in further detail.

Regards,



Siobhán Tinnelly  
Associate Director, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)  
Telephone: 01-8030401, Email: [siobhan.tinnelly@tobin.ie](mailto:siobhan.tinnelly@tobin.ie)

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Co. Reg. No. 42654 – Registered Office: Fairgreen House, Fairgreen Road, Galway. Ireland.



Block 10-4,  
Blanchardstown Corporate Park,  
Dublin 15 D15 X98N  
Tel: + 353 (0)1 8030401/6  
Fax: + 353 (0)1 8030409/10

Fairgreen House,  
Fairgreen Road  
Galway H91 AXK8  
Tel: + 353 (0)91 565211  
Fax: + 353 (0)91 565398

Market Square,  
Castlebar,  
Co. Mayo F23 Y427  
Tel: +353 (0)94 9021401  
Fax: +353 (0)94 9021534

4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

*Our ref: 8057-Correspondence (No. 2)*

**Mr. Ronan Hannigan**  
**Irish Raptor Study Group**  
**Golden Eagle Trust Ltd**  
**22 Fitzwilliam Square,**  
**Dublin 2**

**27<sup>th</sup> April 2017**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford (2<sup>nd</sup> Consultation Letter)**

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Block 10-4,  
Blanchardstown Corporate Park,  
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Fairgreen House,  
Fairgreen Road  
Galway H91 AXK8  
Tel: + 353 (0)91 565211  
Fax: + 353 (0)91 565398

Market Square,  
Castlebar,  
Co. Mayo F23 Y427  
Tel: +353 (0)94 9021401  
Fax: +353 (0)94 9021534

4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

**Our ref: 8057-Correspondence (No. 2)**

**Ms. Yvonne Jackson**  
**Fáilte Ireland**  
**Aras Failte, The Environment and Planning Unit,**  
**88/95 Amiens Street, D1**  
**D01WR86**

**27<sup>th</sup> April 2017**

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**Consulting Engineers**

Block 10-4,  
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Tel: +353 (0)94 9021401  
Fax: +353 (0)94 9021534

4th Floor (Suite 1)  
Ergon House  
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Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

**Our ref: 8057-Correspondence (No. 2)**

**Mr. Mervyn Hamilton  
Waterways Ireland  
Eastern Regional Office  
Floor 2, Block C,  
Ashtowngate, Navan Road, D15 Y3EK**

**27<sup>th</sup> April 2017**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford (2<sup>nd</sup> Consultation Letter)**

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**Our ref: 8057-Correspondence (No. 2)**

**Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs  
23 Kildare Street  
Dublin 2,**

**27<sup>th</sup> April 2017**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford (2<sup>nd</sup> Consultation Letter)**

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**Consulting Engineers**

Block 10-4,  
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Dublin 15 D15 X98N  
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**Our ref: 8057-Correspondence (No. 2)**

**Mr. Michael Murphy,**  
**Development Applications Unit**  
**Dept. of Arts, Heritage, Regional, Rural & Gaeltacht Affairs**  
**Sent to: manager.dau@ahg.gov.ie**

**27<sup>th</sup> April 2017**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford (2<sup>nd</sup> Consultation Letter).**  
**DAU Reference No. G Pre00292/2016**

Dear Mr. Murphy,

As per correspondence issued from TOBIN Consulting Engineers in September 2016, Bord na Móna Powergen Ltd. proposes to develop the Derryadd Wind Farm, near Lanesborough, south County Longford.

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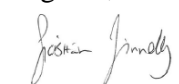
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It should be noted that we acknowledge receipt of the Development Applications Unit (DAU) response (dated October 12<sup>th</sup> 2016) to the September 2016 consultation correspondence. As requested, we will provide a summary of the ecology surveys/studies that will form the baseline for the Biodiversity Chapter of the Derryadd Wind Farm EIS and AA Screening Report/NIS directly to the DAU in the coming weeks.

We invite you to submit any relevant additional information that you may hold and/or highlight any issues that you feel should be directed to the project team. Views/comments on the proposed development can be submitted by email, letter or telephone to the contact below no later than the 19<sup>th</sup> of May 2017. Also, we are available to meet with representatives of the DAU/NPWS to discuss the project, at your convenience.

Regards,



Siobhán Tinnelly

Associate Director, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)

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Westminster  
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**Our ref: 8057-Correspondence (No. 3)**

**Mr. Michael Murphy,  
Development Applications Unit  
Dept. of Arts, Heritage, Regional, Rural & Gaeltacht Affairs  
Sent to: manager.dau@ahg.gov.ie**

**3<sup>rd</sup> May 2017**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford (3<sup>rd</sup> Consultation Letter).  
DAU Reference No. G Pre00292/2016**

Dear Mr. Murphy,

As per correspondence issued from TOBIN Consulting Engineers in September 2016 and April 2017, Bord na Móna Powergen Ltd. proposes to develop the Derryadd Wind Farm, near Lanesborough, south County Longford.

Within the April 27<sup>th</sup> 2017 correspondence it was stated that TOBIN Consulting Engineers would provide a summary of the ecology surveys/studies that will form the baseline for the Biodiversity Chapter of the Derryadd Wind Farm EIS and AA Screening Report/NIS directly to the DAU in the coming weeks. It is the purpose of this correspondence to seek comment from the DAU on the extent and appropriateness of ecological surveys undertaken at the site to date. Surveys which have been undertaken at the proposed wind farm located on the Derryaroge, Derryadd and Lough Bannow Bogs include;

#### Bird Surveys

- Bird surveys have been conducted at the site from October 2014 to April 2017 inclusive;
- Vantage point surveys were undertaken from fixed point locations, 6 hours per vantage point per month over this period;
- Breeding bird surveys, particularly targeting raptor and waders, were conducted in suitable habitat both onsite (transects) and in the hinterland of the site (vantage points);
- Following a review of survey results in the Spring of 2016, targeted woodcock surveys were conducted in areas of suitable habitat in June 2016; and
- I-WeBS monthly counts (May 2016 to April 2017) were conducted at local wetland water bird sites during daylight hours (ideally at dawn or before dusk) from suitable vantage points.

#### Ecological Walkover Survey

A multi-disciplinary walkover survey following the methodology outlined by the NRA (2009) was undertaken at the proposed turbine locations, including all hardstand areas. These surveys aimed to record the habitats, flora and fauna present within the survey area. Particular attention was paid to potential protected mammal breeding habitat (e.g. scrub) in the vicinity of proposed turbine locations. Additionally, during the Summers of 2010 and 2012, Bord na Móna conducted extensive flora and fauna surveys of their bog groups including those within the study area of this planning application. The resulting ecological survey reports detail key ecological features of interest.

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Tel: +353 (0)94 9021401  
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4th Floor (Suite 1)  
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Westminster  
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## Bat Surveys

Surveys undertaken for bats in 2016 (June to November) included static recorder rotational surveys, and both walked and driven transect surveys. These surveys were conducted at the proposed turbine locations and focused on linear structures in the environment. In addition, a driven survey of local roads in the vicinity of the development was conducted based on detection and car speed, as detailed in Roches et al. (2012).

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Castlebar,  
Co. Mayo F23 Y427  
Tel: +353 (0)94 9021401  
Fax: +353 (0)94 9021534

4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
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Tel: +44 20 3713 4370  
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**Our ref: 8057-Correspondence (No. 2)**

**Ms. Pamela McDonnell  
Environmental Protection Agency  
PO 3000  
Johnstown Castle Estate,  
Co. Wexford**

**27<sup>th</sup> April 2017**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford (2<sup>nd</sup> Consultation Letter)**

Dear Madam,

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**Our ref: 8057-Correspondence (No. 2)**

**Health & Safety Authority  
The Metropolitan Building  
James Joyce Street,  
Dublin 1  
D01 K0Y8**

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Co. Reg. No. 42654 – Registered Office: Fairgreen House, Fairgreen Road, Galway. Ireland.

Block 10-4,  
Blanchardstown Corporate Park,  
Dublin 15 D15 X98N  
Tel: + 353 (0)1 8030401/6  
Fax: + 353 (0)1 8030409/10

Fairgreen House,  
Fairgreen Road  
Galway H91 AXK8  
Tel: + 353 (0)91 565211  
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Market Square,  
Castlebar,  
Co. Mayo F23 Y427  
Tel: +353 (0)94 9021401  
Fax: +353 (0)94 9021534

4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

*Our ref: 8057-Correspondence (No. 2)*

**Sustainable Energy Authority of Ireland  
Wilton Park House,  
Wilton Pl,  
Dublin 2**

**27<sup>th</sup> April 2017**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford (2<sup>nd</sup> Consultation Letter)**

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4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
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**Irish Wildlife Trust  
Sigmund Business Centre  
93A Lagan Road, Dublin Industrial Estate,  
Glasnevin. Dublin 11  
D11 EP9P**

**27<sup>th</sup> April 2017**

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4th Floor (Suite 1)  
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**Our ref: 8057-Correspondence (No. 2)**

**Irish Peatland Conservation Council  
Bog of Allen Nature Centre  
Lullymore West, Rathangan  
Co. Kildare**

**27<sup>th</sup> April 2017**

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4th Floor (Suite 1)  
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**Our ref: 8057-Correspondence (No. 2)**

**Mr. Brian O' Connell**  
**HSE West**  
**HSE Communications Office**  
**Arden Road, Tullamore**  
**Co. Offaly**

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*Our ref: 8057-Correspondence (No. 2)*

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National Animal Centre  
Derryglogher Lodge,  
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**Bat Conservation Ireland**  
**Ulex House**  
**Drumheel, Lisduff**  
**Virginia**  
**Co. Cavan**

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## Consulting Engineers

Block 10-4,  
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Fairgreen House,  
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**Department of Agriculture, Marine and Food  
Agriculture House  
Kildare St.,  
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D02 WK12**

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**Ms. Cathy Ann Purcell  
Commission for Energy Regulation  
The Exchange  
Belgard Square North,  
Tallaght, Dublin 24**

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Email: info@tobin-uk.com

**Our ref: 8057-Correspondence (No. 2)**

**Midlands Energy Agency  
Comhairle Chontae Laoise  
Áras an Chontae,  
Portlaoise  
Contae Laoise**

**27<sup>th</sup> April 2017**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford (2<sup>nd</sup> Consultation Letter)**

Dear Sir/Madam,

As per correspondence issued from TOBIN Consulting Engineers in September 2016, Bord na Móna Powergen Ltd. proposes to develop the Derryadd Wind Farm, near Lanesborough, south County Longford.

It is proposed that the Derryadd Wind Farm will be built on cutover and cutaway peatlands on the Derryadd, Derryaroge and Lough Bannow Bogs, within the Mountdillon peat production bog group (See Figure 1 attached).

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Also, we are available to meet with representatives of your organisation if you wish to discuss the project and the ongoing assessments in further detail.

Regards,



Siobhán Tinnelly  
Associate Director, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)  
Telephone: 01-8030401, Email: [siobhan.tinnelly@tobin.ie](mailto:siobhan.tinnelly@tobin.ie)

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Co. Reg. No. 42654 – Registered Office: Fairgreen House, Fairgreen Road, Galway. Ireland.

Block 10-4,  
Blanchardstown Corporate Park,  
Dublin 15 D15 X98N  
Tel: + 353 (0)1 8030401/6  
Fax: + 353 (0)1 8030409/10

Fairgreen House,  
Fairgreen Road  
Galway H91 AXK8  
Tel: + 353 (0)91 565211  
Fax: + 353 (0)91 565398

Market Square,  
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Tel: +353 (0)94 9021401  
Fax: +353 (0)94 9021534

4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

**Our ref: 8057-Correspondence (No. 2)**

**Irish Aviation Authority (IAA)**  
**Times Building**  
**11-12 D'oliver Street,**  
**Dublin 2**

**27<sup>th</sup> April 2017**

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Block 10-4,  
Blanchardstown Corporate Park,  
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4th Floor (Suite 1)  
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London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

**Our ref: 8057-Correspondence**

**The Office of Public Works  
Head Office  
Jonathan Swift Street  
Trim  
Sent by email to: [info@opw.ie](mailto:info@opw.ie)**

**27<sup>th</sup> April 2017**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

Dear Sir/Madam,

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Westminster  
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**Our ref: 8057-Correspondence (No. 3)**

**Longford County Council – Planning, Environment, Roads  
Great Water St.,  
Longford,  
N39 NH56**

**9th April 2018**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

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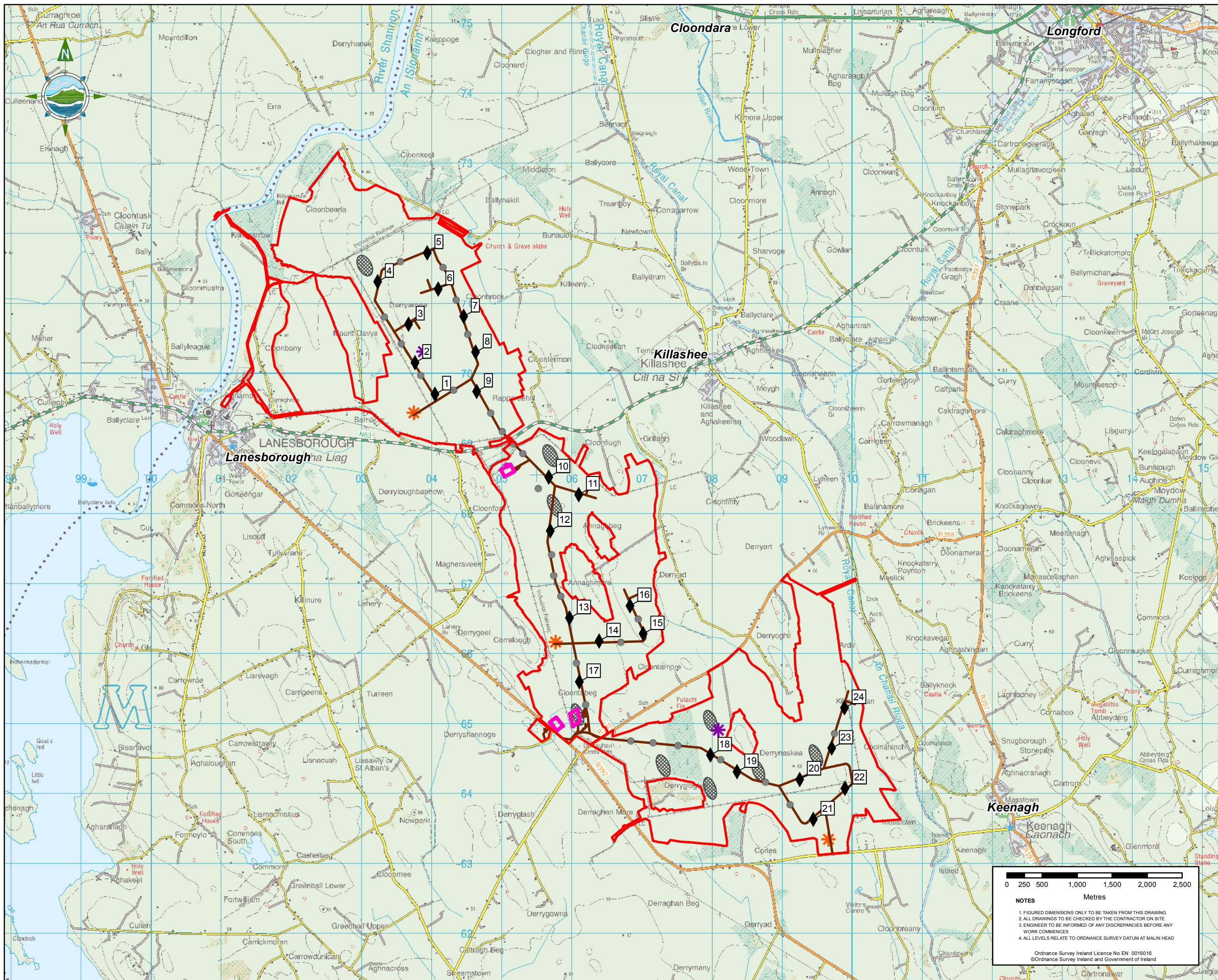


Eoin O'Mullane

Snr Project Manager, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)

Telephone: 01-8030401, Email: eoin.omullane@tobin.ie





- Legend**
- Proposed Derryadd Wind Farm Site
  - ◆ Proposed\_Turbine\_Locations\_2018
  - Proposed Construction Traffic Passing Bays
  - Potential Substation Location
  - ✱ Proposed Met Mast Locations
  - ✱ Existing Met Mast Locations
  - Proposed Cable Connections (TBC)
  - Potential Borrow Pits

Issue	Date	Description	By	Chkd.
D07	FEB 2018	Information Issue	MN	EOM
D06	JAN 2018	Information Issue	MN	ST
D05	DEC 2017	Information Issue	MN	ST

Client:  
**BORD NA MÓNA**  
 Naturally Driven

Project:  
**DERRYADD WINDFARM**

Title:  
**SITE LAYOUT**

Scale @ A3: 1:50,000  
 Prepared by: M. Nolan  
 Checked: S. Tinnelly  
 Date: April 2017  
 Project Director: D. Grehan

**TOBIN**  
 Patrick J. Tobin & Co. Ltd.  
 Consulting, Civil and Structural Engineers,  
 Block 10-4, Blanchardstown Corporate Park,  
 Dublin 15, Ireland.  
 tel: +353-(0)1-8030406  
 fax: +353-(0)1-8030409  
 e-mail: info@tobin.ie  
 www.tobin.ie

Issue:  
**D07**  
 8057-1004

0 250 500 1,000 1,500 2,000 2,500  
 Metres

**NOTES**

- FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING
- ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE
- ENGINEER TO BE INFORMED OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES
- ALL LEVELS RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD

Ordnance Survey Ireland Licence No EN 0016016  
 ©Ordnance Survey Ireland and Government of Ireland





Block 10-4,  
Blanchardstown Corporate Park,  
Dublin 15 D15 X98N  
Tel: + 353 (0)1 8030401/6  
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Fairgreen House,  
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Galway H91 AXK8  
Tel: + 353 (0)91 565211  
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Market Square,  
Castlebar,  
Co. Mayo F23 Y427  
Tel: +353 (0)94 9021401  
Fax: +353 (0)94 9021534

4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

**Our ref: 8057-Correspondence (No. 3)**

**Roscommon County Council - Planning, Environment, Roads**  
**Áras an Chontae,**  
**Roscommon,**  
**F42 VR98**

**9th April 2018**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

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Telephone: 01-8030401, Email: eoin.omullane@tobin.ie

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4th Floor (Suite 1)  
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Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
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*Our ref: 8057-Correspondence (No. 3)*

**Department of Communications, Climate Action and Environment  
Elm House,  
Earlsvale Road,  
Cavan  
H12 A8H7**

**9th April 2018**

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Block 10-4,  
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**Our ref: 8057-Correspondence (No. 3)**

**Ms. Gretta Hannigan  
Inland Fisheries Ireland  
3044 Lake Drive  
City West,  
Dublin 24**

**9th April 2018**

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**Our ref: 8057-Correspondence (No. 3)**

**Ms. Sophie Preteseille/Monica Lee  
Geological Survey of Ireland  
Beggars Bush  
Haddington Road,  
Dublin 4**

**9th April 2018**

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**Mr. Vincent O' Malley**  
**Transport Infrastructure Ireland**  
**Parkgate Business Centre**  
**Parkgate Street,**  
**Dublin 8**

**9th April 2018**

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Tel: + 353 (0)1 8030401/6  
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Fairgreen House,  
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Galway H91 AXK8  
Tel: + 353 (0)91 565211  
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4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

**Our ref: 8057-Correspondence (No. 3)**

**An Taisce  
Tailors Hall  
Backlane,  
Dublin 8**

**9th April 2018**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

Dear Sir/Madam,

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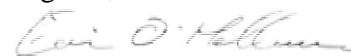
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Eoin O'Mullane

Snr Project Manager, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)

Telephone: 01-8030401, Email: eoin.omullane@tobin.ie

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*Our ref: 8057-Correspondence (No. 3)*

**BirdWatch Ireland  
Unit 20, Block D,  
Bullford Business Campus,  
Kilcoole, Greystones  
Co. Wicklow, A63 RW83**

**9th April 2018**

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**Our ref: 8057-Correspondence (No. 3)**

**Teagasc  
Oak Park  
Carlow**

**9th April 2018**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

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**Our ref: 8057-Correspondence (No. 3)**

**Ms. Allison Harvey  
The Heritage Council  
Áras na hOidhreachta  
Church Lane,  
Kilkenny**

**9th April 2018**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

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**Our ref: 8057-Correspondence (No. 3)**

**Department of Transport, Tourism & Sport  
Leeson Lane  
Dublin 2,  
Ireland**

**9th April 2018**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

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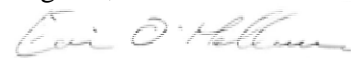
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*Our ref: 8057-Correspondence (No. 3)*

**Mr. Ronan Hannigan**  
**Irish Raptor Study Group**  
**Golden Eagle Trust Ltd**  
**22 Fitzwilliam Square,**  
**Dublin 2**

**9th April 2018**

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**Our ref: 8057-Correspondence (No. 3)**

**Ms. Yvonne Jackson**  
**Fáilte Ireland**  
**Aras Fáilte, The Environment and Planning Unit,**  
**88/95 Amiens Street, D1**  
**D01WR86**

**9th April 2018**

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**Our ref: 8057-Correspondence (No. 3)**

**Mr. Mervyn Hamilton  
Waterways Ireland  
Eastern Regional Office  
Floor 2, Block C,  
Ashtowngate, Navan Road, D15 Y3EK**

**9th April 2018**

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**Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs  
23 Kildare Street  
Dublin 2,**

**9th April 2018**

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**Our ref: 8057-Correspondence (No. 3)**

**Mr. Michael Murphy,  
Development Applications Unit  
Dept. of Arts, Heritage, Regional, Rural & Gaeltacht Affairs  
Sent to: manager.dau@ahg.gov.ie**

**10th April 2018**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford  
DAU Reference No. G Pre00292/2016**

Dear Mr. Murphy,

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**Consulting Engineers**

Block 10-4,  
Blanchardstown Corporate Park,  
Dublin 15 D15 X98N  
Tel: + 353 (0)1 8030401/6  
Fax: + 353 (0)1 8030409/10

Fairgreen House,  
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Tel: + 353 (0)91 565211  
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Co. Mayo F23 Y427  
Tel: +353 (0)94 9021401  
Fax: +353 (0)94 9021534

4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

**Our ref: 8057-Correspondence (No. 3)**

**Ms. Pamela McDonnell  
Environmental Protection Agency  
PO 3000  
Johnstown Castle Estate,  
Co. Wexford**

**9th April 2018**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

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4th Floor (Suite 1)  
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Westminster  
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**Our ref: 8057-Correspondence (No. 3)**

**National Parks and Wildlife Service  
7 Ely Place  
Dublin 2,  
D02 TW98**

**9th April 2018**

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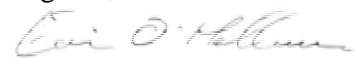
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**Our ref: 8057-Correspondence (No. 3)**

**Health & Safety Authority  
The Metropolitan Building  
James Joyce Street,  
Dublin 1  
D01 K0Y8**

**9th April 2018**

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**Our ref: 8057-Correspondence (No. 3)**

**Sustainable Energy Authority of Ireland  
Wilton Park House,  
Wilton Pl,  
Dublin 2**

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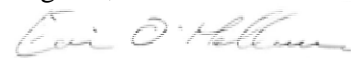
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*Our ref: 8057-Correspondence (No. 3)*

**Irish Wildlife Trust  
Sigmund Business Centre  
93A Lagan Road, Dublin Industrial Estate,  
Glasnevin, Dublin 11  
D11 EP9P**

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**Our ref: 8057-Correspondence (No. 3)**

**Irish Peatland Conservation Council  
Bog of Allen Nature Centre  
Lullymore West, Rathangan  
Co. Kildare**

**9th April 2018**

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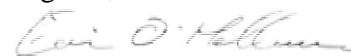
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**Our ref: 8057-Correspondence (No. 3)**

**Mr. Brian O' Connell**  
**HSE West**  
**HSE Communications Office**  
**Arden Road, Tullamore**  
**Co. Offaly**

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**Our ref: 8057-Correspondence (No. 3)**

**ISPCA (Longford office)  
National Animal Centre  
Derryglogher Lodge,  
Keenagh  
Co. Longford**

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**Bat Conservation Ireland  
Ulex House  
Drumheel, Lisduff  
Virginia  
Co. Cavan**

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Regards,



**Eoin O'Mullane**  
Snr Project Manager, TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen Ltd.)  
Telephone: 01-8030401, Email: eoin.omullane@tobin.ie

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Co. Reg. No. 42654 – Registered Office: Fairgreen House, Fairgreen Road, Galway. Ireland.

**Consulting Engineers**

Block 10-4,  
Blanchardstown Corporate Park,  
Dublin 15 D15 X98N  
Tel: + 353 (0)1 8030401/6  
Fax: + 353 (0)1 8030409/10

Fairgreen House,  
Fairgreen Road,  
Galway H91 AXK8  
Tel: + 353 (0)91 565211  
Fax: + 353 (0)91 565398

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Co. Mayo F23 Y427  
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Fax: +353 (0)94 9021534

4th Floor (Suite 1)  
Ergon House  
Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

*Our ref: 8057-Correspondence (No. 3)*

**Department of Agriculture, Marine and Food  
Agriculture House  
Kildare St.,  
Dublin 2  
D02 WK12**

**9th April 2018**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

Dear Sir/Madam,

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Dean Bradley Street  
Westminster  
London SW1P 2AL  
Tel: +44 20 3713 4370  
Email: info@tobin-uk.com

**Our ref: 8057-Correspondence (No. 3)**

**Ms. Cathy Ann Purcell  
Commission for Energy Regulation  
The Exchange  
Belgard Square North,  
Tallaght, Dublin 24**

**9th April 2018**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

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Westminster  
London SW1P 2AL  
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**Our ref: 8057-Correspondence (No. 3)**

**Midlands Energy Agency  
Comhairle Chontae Laoise  
Áras an Chontae,  
Portlaoise  
Contae Laoise**

**9th April 2018**

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**Our ref: 8057-Correspondence (No. 3)**

**Irish Aviation Authority (IAA)  
Times Building  
11-12 D'oliver Street,  
Dublin 2**

**9th April 2018**

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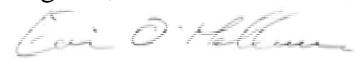
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**Our ref: 8057-Correspondence (No. 3)**

**The Office of Public Works**

**Head Office**

**Jonathan Swift Street**

**Trim**

**Sent by email to: [info@opw.ie](mailto:info@opw.ie)**

**10<sup>th</sup> April 2017**

Dear Mr. Murphy,

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**Consulting Engineers**

Block 10-4,  
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Dublin 15 D15 X98N  
Tel: + 353 (0)1 8030401/6  
Fax: + 353 (0)1 8030409/10

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Galway H91 AXK8  
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**Our ref: 8057-Correspondence (No. 3)**

**The Office of Public Works  
Head Office  
Jonathan Swift Street,  
Trim  
Co. Meath**

**9th April 2018**

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

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Co. Reg. No. 42654 – Registered Office: Fairgreen House, Fairgreen Road, Galway. Ireland.

12<sup>th</sup> September 2016

Siobhán Tinnelly  
Associate Director  
Tobin Consulting Engineers  
Block 10-4  
Blanchardstown Corporate Park  
Dublin 15  
D15 X98N

Our Ref: D/16/5815

TOBIN CONSULTING ENGINEERS	
PROJECT NO:	
FILE REF:	
Date Received	13 SEP 2016
PASS TO	DATE
ST	

Re: Your letter dated 8<sup>th</sup> September 2016

Dear Ms. Tinnelly,

On behalf of the Commission for Energy Regulation (CER), I hereby acknowledge receipt of your planning application for Bord na Móna Powergen Ltd.

Should you have any queries in the meantime please do not hesitate to contact me.

Yours sincerely,



Kathyann Purcell  
PA to Director of Energy Networks & Legal  
John Melvin.  
PA to Director of Energy Safety  
Dr. Ann McGarry.  
Commission for Energy Regulation.

**Siobhan Tinnelly**  
**Tobin Consulting Engineers**

**Re; Proposed Development of Derryadd Wind Farm, Co Longford.**

Dear Ms Tinnelly,

I refer to your recent correspondence concerning the above.

1. The chapters and process outlined should adequately address any ecological concerns, which may arise either temporarily during construction phase or longer term and any appropriate mitigation identified. Any damage to landscape features during construction phase should be repaired to a satisfactory standard to retain the ecological and functional value of such features in the landscape.
2. In relation to the reference to upgrading of drainage systems, it is important that the study, especially regarding chapter 9 on soils and geology, take into account a thorough assessment of the potential impact on neighbouring agricultural lands, arising from any changes to the drainage system i.e. impacts on water table etc on the surrounding agricultural lands.

Yours sincerely



**Liz McDonnell**  
**Environmental Co-ordination Unit**  
**Climate Change and Bioenergy Division**  
**Department of Agriculture Food and the Marine**  
**Pavilion A**  
**Grattan Business Park**  
**Portlaoise**  
**Co. Laois**  
**R32 K857**  
**057 8689915**



12 October 2016

Ref: G Pre00292/2016

Orla McAlister  
Senior Scientist  
TOBIN Consulting Engineers

**Proposed SID Windfarm with 20-30 wind turbines on cutaway peatlands at Derryadd, Derryaroge and Lough Bannow bogs, Co Longford**

A Chara,

I refer to your pre-planning enquiry in relation to the preparation for the proposed windfarm with 20-30 wind turbines on cutaway peatlands at Derryadd, Derryaroge and Lough Bannow bogs, Co Longford.

Outlined below are the nature conservation recommendations of the National Parks & Wildlife Service (NPWS) of the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.

It is noted that the location of the proposed development (*wind farm*) is situated in a location likely to impact on protected species and habitats.

E.g.:	Breeding Curlew	Buzzard
	Cuckoo	Woodpeckers
	Hen Harrier	Barn Owl
	Vertigo snail	Pine Marten

The Department considers that the information submitted does not allay our concerns in relation to the location of the wind turbines within the large area outlined on the map provided. In principle there are no objections to the development, but the exact locations of each turbine would need to be addressed to avoid areas of conservation interest. i.e. areas of intact hedgerows, mature trees, foraging areas, streams, fens, cut-over bog, intact bog remnants. This information would allow a full assessment of the impact of the turbines in this area.

Therefore, it is not possible to adequately assess the impact of the proposed development accordingly, prior to making any decision; it is recommended that the applicant be requested to provide additional information to address the concerns outlined above.

These recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any decision the Minister may take upon sight of a formal planning application.

Kindly forward any further queries/information to [manager.dau@ahg.gov.ie](mailto:manager.dau@ahg.gov.ie); if this is not possible, correspondence may alternatively be sent to the address below.

Is mise le meas,

**Michael Murphy,**  
**Development Applications Unit**  
**Tel: (053) 911 7516**





# Fáilte Ireland

National Tourism Development Authority

## Guidelines on the treatment of tourism in an Environmental Impact Statement

### 1. Introduction

Tourism is a significant component of the Irish Economy – estimated to employ approximately 205,000 people – and contributing €6.6 billion in spending to the economy in 2014. The environment is one of the main resources upon which this activity depends – so it is important that the EIS evaluates whether and how the interacting impacts of a project are likely to affect tourism resources.

The purpose of this short note is to provide guidance on how these impacts can be assessed through the existing EIA process. Undertaking an EIA is governed by the EIA Advice Notes published by the EPA. These Advice Notes contain detailed guidance on how to describe and evaluate the effects arising from a range of projects, including tourism projects.

These guidelines were written with the assistance of Conor Skehan, Head of Department of Environment and Planning, Dublin Institute of Technology.

### 2. Tourism and the Environment

There are two interactions between tourism and the environment.

1. Impacts caused by Tourism Projects
2. Impacts affecting Tourism (e.g. the quality of a destination or a tourism activity)

#### Impacts caused by Tourism Projects

Tourism projects can give rise to effects on the environment. These are specifically dealt with under a number of Project Types in the Advice Notes, specifically:

#### **12 TOURISM AND LEISURE**

- a. Ski-runs, ski-lifts and cable-cars where the length would exceed 500 metres and associated developments. Project Type 20
- b. Sea water marinas where the number of berths would exceed 300 and fresh water marinas where the number of berths would exceed 100. Project Type 10

- c. Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms. Project Type 28
- d. Permanent camp sites and caravan sites where the number of pitches would be greater than 100. Project Type 28
- e. Theme parks occupying an area greater than 5 hectares. Project Type 29

**Figure 1 The Advice Notes contain detailed descriptions on how to describe and evaluate the effects arising from a range of tourism projects.**

### **Impacts affecting Tourism**

Environmental effects of other projects on tourism are not specifically addressed in the Advice Notes. Taking account of the significance of tourism to the Irish economy a specialist topic of 'Tourism' has been prepared to facilitate a systematic evaluation of effects on this sector within the format laid down for other parts of the Environmental Impact Statement.

It is not intended that the assessment of effects on tourism should become a separate section of the Impact Statement, instead it is intended to become a specialist sub-section of the topic 'Human Beings' which is currently described in Section 2 of the Advice Notes

## **3. Tourism in the Existing Environment**

### **Introduction**

Visitor attitude surveys reveal that the following factors – in order of priority – are the reasons that tourists visit and enjoy Ireland:

- Beautiful scenery
- Friendly & hospitable people
- Safe & Secure
- Easy, relaxed pace of life
- Unspoilt environment
- Nature, wildlife, flora
- Interesting history & culture
- Plenty of things to see and do
- Good range of natural attractions

It is noteworthy that over half of the factors listed are environmental and that all others are related to the way of life of the people. The following describes how these factors are considered within an EIS, set out under EIA topic headings, and how they interact with tourism.

### *Beautiful scenery*

This is covered in the '*Landscape*' Section. Particular attention needs to be paid to effects on views from existing purpose-built tourism facilities, especially hotels, as well as views from touring routes and walking trails. It is important to note that there appears to be evidence that the visitor's expectations of 'beautiful' scenery does not exclude an admiration of new modern developments – such as windfarms – which appear to be seen as indicative of a modern, informed and responsible attitude to the environment.

### *Friendly & hospitable people*

This is not an environmental factor though it is indirectly covered under the '*Human Beings*' section of the EIS. The principal factor is the ratio of visitors to residents. This is of less significance in areas with long-established patterns of tourism.

### *Safe & Secure*

This is not an environmental issue – though some of the factors that are sometimes covered under the heading of '*Human Beings*' – such as social inclusion or poverty – can point to likely effects and interactions.

### *Easy, relaxed pace of life*

This is not an environmental issue though it is partially covered under '*Human Beings*' – see comments above.

### *Unspoilt environment*

This is covered under the sections dealing with '*Landscape*', '*Flora*' and '*Fauna*' and to a lesser extent under emissions to '*Water*' and '*Air*'. In some instances traffic congestion, especially in rural areas, can be an issue, this is usually covered within '*Material Assets*'.

### *Nature, wildlife, flora*

This is principally covered under the headings of '*Flora*' and '*Fauna*' and to a lesser extent by '*Landscape*', '*Water*' and '*Air*'. The principal issues being to avoid any effects that might reduce the health or extent of the habitats. This can occur either directly, by impinging on the site, or indirectly, through emission, that can affect the natural resources, like clean water, which the habitat depends on. It also considers effect on physical access to and visibility of these sites. Occasionally there are concerns about the disturbance or wear and tear of visitor numbers to such sites.

### *Interesting history & culture*

This is principally covered under '*Cultural Heritage*' and, to a lesser extent, under '*Human Beings*'. The principal issues being to avoid damage to sites and structures of cultural, historical, archaeological or architectural significance – and to their contexts or settings. It also considers effect on physical access to and visibility of these sites. Occasionally there are concerns about the wear and tear of visitor numbers to such sites.

*Plenty of things to see and do.*

This is not an environmental issue though it is partially covered by the 'Human Beings' section, where the tourism resources of an area are described and assessed.

*Good range of natural attractions*

This is covered by the 'Landscape', 'Flora', 'Fauna', and 'Cultural Heritage' sections of the EIS.

## **4. Project factors affecting Tourism**

### **Introduction**

Tourism can be affected both by the structures or emissions of new developments as well as by interactions between new activities and tourism activities – for example the effects of high volumes of heavy goods vehicles passing through hitherto quiet, scenic, rural areas. Tourism can be affected by a number of the characteristics of the new project such as:

- New Developments
  - Social Considerations
  - Land-uses and Activities
- 
- *New Developments* - will the development stimulate or suppress demand for additional tourism development in the area? If so, what type, how much and where? Marinas, golf courses, other major sporting facilities as well as theme parks and larger conference facilities can all stimulate the emergence of new accommodation, catering and leisure facilities often within an extensive area around a new primary visitor facility. Extensive urbanisation and large scale infrastructure as well as certain processing and extractive industries all have the potential to suppress demand for additional tourism – but usually only in the immediate locality of the new development. It should be noted however, that some types of new or improved large scale infrastructure – such as roads – can improve the visitor experience – by increasing safety and comfort or can convey a sense of environmental responsibility – such as wind turbines.
  - *Social Consideration* - will the development change patterns and types of activity and land use? Will it affect the demographics, economy or social dynamics of the locality?
  - *Land-use* - will there be severance, loss of rights of way or amenities, conflicts, or other changes likely to ultimately alter the character and use of the tourism resources in the surrounding area?

### **Existing Tourism**

In the area likely to be affected by the proposed development, the following attributes of tourism, or the resources that sustain tourism, should be described under the following headings.



Note that the detailed description and analysis will usually be covered in the section dealing with the relevant environmental topic – such as '*Landscape*'. Only the relevant finding as to the likely significance to, or effect on, tourism needs to be summarised in this section.

### **Context**

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

- Hotels, conference centres, holiday accommodation – including holiday villages, holiday homes, and caravan parks.
- Visitor centres, Interpretive centres and theme parks
- Golf courses, adventure sport centres and other visitor sporting facilities
- Marinas and boating facilities
- Angling facilities
- Equestrian facilities
- Tourism-related specialist retailers and visitor facilities
- Historic and Cultural Sites
- Pedestrian, cycling, equestrian, vehicular and coach touring routes

Indicate the numbers of premises and visitors likely to be directly affected directly and indirectly.

Identify and quantify, where possible, their potential receptors of impacts, noting in particular transient populations, such as drivers, walkers, seasonal and other non-resident groups.

Describe any significant trends evident in the overall growth or decline of these numbers, or of any changes in the proportion of one type of activity relative to any other.

Indicate any commercial tourism activity which likely to be directly affected, with resultant environmental impacts.

### **Character**

Indicate the occupations, activities or interests of principal types of tourism in the area. – Where relevant, describe the specific environmental resources or attributes in the existing environment which each group uses or values; where relevant, indicate the time, duration or seasonality of any of those activities. For example describe the number of guides, boats and anglers who use a salmon fishery and the duration of the salmon season as well as the quantity and type of local accommodation that is believed to be used by the anglers.

### **Significance**

Indicate the significance of the principal tourism assets or activities likely to be affected. Refer to any existing formal or published designation or recognition of such significance. Where possible provide an estimate of the contribution of such

tourism activities to the local economy. For instance refer to the number of annual visitors to a tourism attraction or to the grading of a hotel.

### **Sensitivity**

Describe any significant concerns, fears or opposition to the development known to exist among tourism interests. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened. For instance describe the extent of a potential visual intrusion onto a site of historic significance which is the main local tourist attraction.

## **5. Impacts on Tourism**

### **"Do Nothing" Impact;**

Describe how trends evident in the existing environment will continue and how these trends will affect tourism.

### **Predicted impact;**

- Describe the location, type, significance, magnitude/extent of the tourism activities or assets that are likely to be affected.
  
- Describe how the new development will affect the balance between long-established and new dwellers in an area and its affect on the cultural or linguistic distinctiveness of an area. For example describe the effect of a new multi-national population required for an international call-centre located in a Gaeltacht area.
  
- Describe how changes in patterns of employment, land use and economic activity arising from the proposed development will affect tourism, for example, illustrating how a new industrial development will diversify local employment opportunities thereby reducing the area's unsustainable over-reliance on seasonal tourism.
  
- Describe the consequences of change, referring to indirect, secondary and cumulative impacts on tourism; Examples can include describing how the new development may lead to a reduced assimilative capacity for traffic or water during the peak of the tourism season or how new urbanism combined with existing patterns of tourism may lead to unsustainable levels of pedestrian traffic through a sensitive habitat.
  
- Describe the potential for interaction between changes induced in tourism and other uses that may affect the environment – for instance increasing new tourism-related housing affecting water resources or structures
  
- Describe the worst case for tourism if all mitigation measures fail.

## 6. Mitigating adverse impact on Tourism

Describe the mitigation measures proposed to:

- *avoid* sensitive tourism resources – such as views, access, and amenity areas including habitats as well as historical or cultural sites and structures.
- *reduce* the exposure of sensitive resources to excessive environmental burdens arising from the development's emissions or volumes of traffic [pedestrian and vehicular], and/or losses of amenity arising from visually conspicuous elements of the development – for example by prioritizing visual screening of views from a hotel towards a quarry.
- *reduce* the adverse effects to tourism land uses and patterns of activities – especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance – for example by separating traffic routes for industrial and tourism traffic.
- *remedy* any unavoidable significant residual adverse effects on tourism resources or activities, for example by providing alternative access to tourism amenities – such as waterways or monuments.

Siobhán Tinnelly  
TOBIN Consulting Engineers  
Block 10-4,  
Blanchardstown Corporate Park,  
Dublin 15 D15 X98N

27<sup>th</sup> September 2016

**Re: Proposed Development of Derryadd Wind Farm, Co. Longford**

**Your Ref: 8057-Correspondence**

**Our Ref.: 16/115**

Dear Ms Tinnelly,

I would like to acknowledge receipt of your correspondence of the 8<sup>th</sup> September 2016 concerning the above.

#### **Datasets and viewers**

To assist you with the compilation of the Environmental Impact Assessment (EIA), and especially the “Soils & Geology, Geotechnics and Ground Stability” and “Hydrology, Hydrogeology and Water Quality” chapters, maps and datasets are currently available for viewing and/or download on the Geological Survey website under “Online Mapping” - direct link: [www.gsi.ie/mapping.htm](http://www.gsi.ie/mapping.htm) with the “Spatial Resources Viewer”:  
<http://dcenr.maps.arcgis.com/apps/MapSeries/?appid=a30af518e87a4c0ab2fbde2aaac3c228>

Datasets (bedrock, karst, groundwater vulnerability, wells, boreholes, etc.) can be downloaded from:  
<http://www.dccae.gov.ie/natural-resources/en-ie/Geological-Survey-of-Ireland/Pages/Data-Downloads.aspx>

#### **Specific data**

Concerning the specific data mentioned in the scoping report, please note the following:

- The “Groundwater Wells” dataset is available from the above mentioned download site. There are no well data within the perimeter of the proposed wind farm but a few exist on the edge.
- Concerning County Geological Sites (CGS), the audit of geological heritage sites for Co. Longford was carried out in 2015 and the shapefile can be downloaded from the Geological Survey website at: <http://www.gsi.ie/Programmes/Heritage+and+Planning/County+Geological+Sites+Audits/Longford.htm> There is currently no CGS within the perimeter of the proposed wind farm. The closest CGS is the “Corlea Trackway” that was discovered during the peat extraction phase by Bord na Móna, and now with a visitor centre. The CGS description is attached and the site is not recommended for NHA designation. Due to the nature, history and location of the site, no impact is anticipated from the proposed wind farm development on the CGS.
- There are no landslide records within the perimeter of the proposed wind farm. Please note that the dedicated viewer <http://spatial.dcenr.gov.ie/GeologicalSurvey/LandslidesViewer/index.html> is being upgraded and should be live in the autumn.



This also means that the data currently displaying doesn't reflect the fully compiled database. Concerning the proposed development, we have two new records with reference GSI\_LS16-039 and GSI\_LS16-40 both with name "Ballymakeggan, Moydow" and grid reference (615150, 772458) that are not yet online. Despite being the closest records, they still lie at about 8kms NE of the proposed development. Should you however require further information on these records, please contact Charise McKeon, Landslide Susceptibility Mapping Project, at [charise.mckeon@gsi.ie](mailto:charise.mckeon@gsi.ie), 01-678 2752.

### **Other comments**

As the Geological Survey karst dataset is far from comprehensive due to important data gaps, we would welcome complementary data collected during the EIA; data which would be added to the national database. If you wish to contribute data, please contact Caoimhe Hickey, Groundwater Programme, at [caoimhe.hickey@gsi.ie](mailto:caoimhe.hickey@gsi.ie), 01-678 2811.

At a later stage, we would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to the Geological Survey national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to Beatriz Mozo, Land Mapping Unit, at [beatriz.mozo@gsi.ie](mailto:beatriz.mozo@gsi.ie), 01-678 2795.

I hope that these comments are of assistance, and if the Geological Survey can be of any further help, please contact me.

Yours sincerely,



---

Sophie Préteseille, Geologist  
Information Management Programme  
E. [sophie.preteseille@gsi.ie](mailto:sophie.preteseille@gsi.ie)  
T. 01-678 2897

## LONGFORD - COUNTY GEOLOGICAL SITE REPORT

<b>NAME OF SITE</b>	<b>Corlea Trackway</b>
Other names used for site	<i>Bóthar Chorr Liath, the Danes' Road</i>
<b>IGH THEME</b>	<b>IGH7 Quaternary, IGH15 Economic Geology, IGH16 Hydrogeology</b>
<b>TOWNLAND(S)</b>	<b>Cloonbreaney</b>
<b>NEAREST TOWN/VILLAGE</b>	<b>Keenagh</b>
<b>SIX INCH MAP NUMBER</b>	<b>22</b>
<b>IRISH GRID REFERENCE</b>	<b>610205E 762540N (trackway in visitor centre)</b>
<b>1:50,000 O.S. SHEET NUMBER</b>	<b>40 GSI BEDROCK 1:100,000 SHEET NO. 12</b>

### Outline Site Description

The Corlea Trackway is an Iron Age trackway, or *togher*, near the village of Keenagh, which was constructed from oak planks in 148–147 BC.

### Geological System/Age and Primary Rock Type

The Corlea Trackway is situated within an area dominated by bedrock of Lower Carboniferous limestone. The trackway itself is set in peat which is Quaternary in age, having formed as an extensive envelope of the landscape in the area since deglaciation, and mostly approximately 7,000-10,000 years ago.

### Main Geological or Geomorphological Interest

The trackway is situated in an area harvested for peat on an industrial-scale by Bord na Móna, principally to supply the peat-fired power stations of the ESB. While today a generally flat and open landscape, the locality was covered by bog, marsh, quicksand, and ponds in the Iron Age, and surrounded by dense woodlands of birch, willow, hazel and alder. Higher ground was underlain by mineral soil, some distance away, and was covered by oak and ash. The terrain was dangerous and impassible for much of the year.

In 1984, timbers recovered from Corlea were radiocarbon dated to the Iron Age (rather than the Bronze Age as had been expected), and an archaeological project was established under Professor Barry Raftery of UCD to investigate the site before it was destroyed by peat-digging. Excavations to 1991 revealed 59 *toghers* in an area of around 125 hectares, and further work has raised the total to 108 with a further 76 in the nearby Derryoghil bog. Dating has shown that the Corlea Trackway was itself constructed in a single year.

The Corlea Trackway was approximately 1 kilometre long and ended on a small island, from which a second trackway connected to dry land on the far side of the bog. The purpose of the trackway is uncertain, but may have served to get to or into the bog, perhaps for ritual purposes, rather than merely to cross it. Whatever its purpose, the roadway was usable for only a few years. This disappearance of the feature gives the site its geological interest, as it was gradually covered by the rising bog, and sank under its own weight into it within a decade.

The site has a visitor centre where audio-visual records of the trackway and its archaeological excavation process are shown, along with an actual preserved section of the trackway. Other features of peat interest are included within the site boundary, such as intact and drained peat, industrially-cutover peat, peat cut by locals, wetlands, and recovering peat.

### Site Importance – County Geological Site

As the various forms of peat are all accessible within a small locality, and as the trackway (and its visitor centre) exists due to the geological and hydrogeological process of peat growth, the locality is ranked as a County Geological Site.

### Management/promotion issues

The Corlea Trackway Visitor Centre is run by the Office of Public Works. The geological aspects of the feature could be highlighted more in some of the promotional material.



The preserved portion of trackway inside the visitor centre.



Recovering peat in wetlands adjacent to the centre.

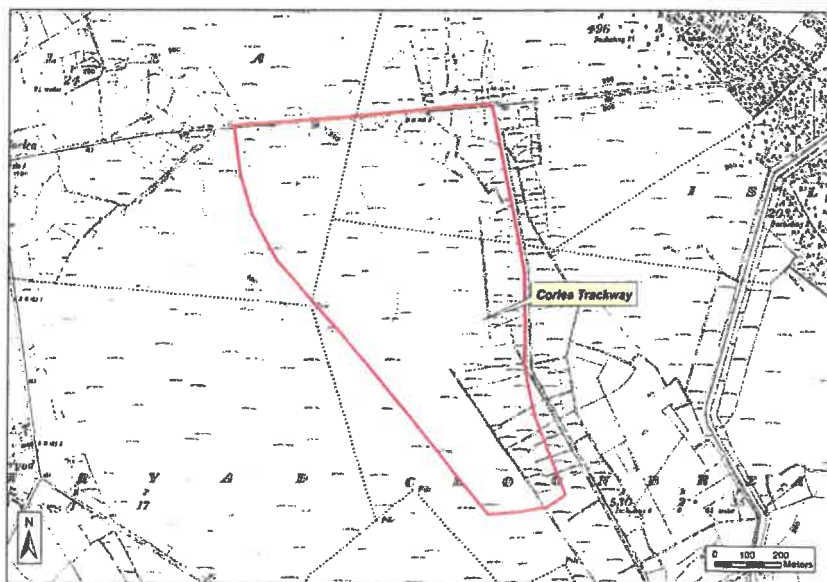


Stacked peat on plots harvested by locals.



Some of the promotional material on the trackway on sale inside the visitor centre.









# IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA HÉIREANN

Lullymore, Rathangan, Co. Kildare, Ireland R51 V293  
*Líolach Mór, Rath Iomgáin, Co. Chill Dara, Éire*

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

3rd October 2016

**Siobhan Tinnelly**  
**TOBIN Consulting Engineers**  
**Block 10-4**  
**Blanchardstown Corporate Park**  
**Dublin 15**

## Proposed Development of Derryadd Wind Farm, Co. Longford

Dear Ms Tinnelly,

I refer to correspondence received from yourselves in relation to scoping for the above proposed development. Thank you for consulting with the Irish Peatland Conservation Council (IPCC). We would like to make a number of comments as outlined below.

While the IPCC welcome the transition away from peat fueled energy generation we are opposed to any development that would result in the loss of, or negatively impact on, intact peatland habitat. While acknowledging that the proposed development site is made up principally of cutaway bog habitat we are aware that will be a number of intact remnants where cutting and in fact drainage will not have occurred. These must be properly assessed and screened out for any adverse impacts that may occur during the construction of the wind turbines and critically of all associated works such as roads and drainage networks. We would appreciate a detailed map of such remnants within the site in the context of turbine and associated works location to be included in the final EIS in order for these to be independently assessed.

### Lough Bawn pNHA

Your document notes the presence of Lough Bawn pNHA within the southern boundary. IPCC liaised with Bord na Móna who provided a map detailing the location of the pNHA in relation to the proposed development area. This site must be given careful consideration as it is known from its site synopsis to be a small and fragile site. The proposed development should not result in any degradation to this protected site. In fact as the development of a wind farm effectively constitutes the production of an after-use rehabilitation plan for the site conservation works should be considered which will aid in the preservation of the pNHA and boost its conservation status, a goal of the National Peatlands Strategy and imperative to Ireland's commitments to conserve peatland habitat.

### Lough Bannow pNHA

Lough Bannow pNHA supports a variety of habitats, as noted to include open water, swamp and reed fringe. These habitats are particularly sensitive to any change in water quality and run off from such a significant development poses a threat. All precautions must be met to ensure no degradation occurs on the site as a result of this development.

### Lough Ree SAC

Your scoping document recognises the fact that Lough Ree SAC/SPA is approximately 540m away from the site. IPCC would like for the EIS to assess any potential watercourses linking the proposed development site to Lough Ree SAC which could be adversely affected by any change in water quality that might result from large scale construction. We would also highlight that in the addition to the birds referenced as qualifying interests for Lough Ree SPA the SAC site synopsis lists large number of curlew (178), which were overwintering on the site. Given the curlew is a species under significant threat in Ireland and some of these birds are likely native breeders these need to be properly assessed and the adequate set back distances put in place.

I would ask for a copy of the EIS on completion.

Is mise le meas,

Tadhg Ó Corcora, IPCC



Bonneagar Iompair Éireann  
Transport Infrastructure Ireland

**Ms. Siobhán Tinnelly**  
Tobin Consulting Engineers  
Blocks 10-4  
Blanchardstown Corporate Park  
Dublin 15  
D15 X98N

Dáta | Date

14 October 2016

Ár dTag | Our Ref.

TII16 95667

<b>TOBIN CONSULTING ENGINEERS</b>	
PROJECT NO:	
FILE REF:	
Date Received	17 OCT 2016
PASS TO	
	DATE
SCAN - TII EIS SCOPING	
DERRYADD	

Bhur dTag | Your Ref.

8057-correspondence

**Re: EIS Scoping relating to Proposed Development of Derryadd Wind Farm, Co. Longford**

Dear Ms. Tinnelly

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

The Authority notes the proposed site extents extend to the north and south of the N63, national secondary road, at a location on the network that is subject to a general 100kph speed limit. In such circumstances, the developer/applicant should be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply.

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

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

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

The developer should have regard, *inter alia*, to the following;

- Consultations should be had with the relevant Local Authority/Roads Design Office with regard to locations of existing and future national road schemes,
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, i.e. N63,
- The developer should assess visual impacts from existing national roads,

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

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

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

Yours sincerely

  
 Michael McCormack  
 Senior Land Use Planner

PP.

## Siobhan Tinnelly

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**From:** Louise Kiernan <lkiernan@longfordcoco.ie>  
**Sent:** 14 October 2016 16:04  
**To:** Siobhan Tinnelly  
**Cc:** Donall Mac An Bheatha  
**Subject:** Proposed Development of Derryadd Windfarm, County Longford

Hi Siobhan,

In relation to the proposed development of Derryadd Wind Farm County Longford the Planning Authority would like to draw your attention to the following:-

- Section 4.5 Tourism and Annex 6 of the Longford County Development Plan 2015-2021 in relation to the potential impact on the Mid-Shannon Wilderness Park
- Section 6.1.1 Landscape Character Assessment.
- Section 5.5.2 Renewal Energy Sources.
- 5.5.2.1 Wind Energy
- In particular attention is drawn to WD4 and the need to consider the application in terms of visual impact, predicted noise levels, design, impact of associated site works, construction, proximity to dwellings, interference with navigation, television and communication signals (in this regard proximity to Abbeyshrule Airstrip should be considered), impact on environmental designations, decommissioning, sensitivity of locations of folklore, mythology and religious significance, location relative to water bodies, future extension proposals.
- In addition to the aforementioned the cumulative impact of the proposed development in conjunction with existing, permitted or future planned windfarms should be considered. This should also consider the transboundary impact in different local authority areas.
- Wind Energy – Guidelines for Planning Authorities (DoEHLG) or any relevant updates.
- Appendix 5 – Areas of Wind potential.
- Reference to the relevant sections in relation to the Midland Regional Planning Guidelines in terms of peatland areas and renewable energy.
- In terms of the field studies to be conducted, care should be taken that these are in the appropriate ecological season.
- Any visual impact assessment should take account of the varying seasons and associated foliage changes.

Kind Regards,

Louise Kiernan  
Senior Executive Planner  
Longford County Council  
Telephone No: 043 – 3343474  
Fax No. 043-3341233  
Email: [lkiernan@longfordcoco.ie](mailto:lkiernan@longfordcoco.ie)  
Web: <http://www.longfordcoco.ie>

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# IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA HÉIREANN

Lullymore, Rathangan, Co. Kildare, Ireland R51 V293  
Líolach Mór, Rath Iongáin, Co. Chill Dara, Éire, R51 V293

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

Ms Siobhán Tinnelly  
TOBIN Consulting Engineers  
Block 10-4  
Blanchardstown Corporate Park  
Dublin 15

16th May 2017

## Re: Proposed Development of Derryadd Wind Farm, Co. Longford (2nd Consultation Letter)

Dear Ms Tinnelly,

Thank you for giving the Irish Peatland Conservation Council the opportunity to voice our concerns on the proposed Bord na Mona/Derryadd Wind Farm. We have requested a habitat map of the proposed placement of the turbines but have not yet received a reply.

The Irish Peatland Conservation Council (IPCC) was established in 1982 and has 35 years of experience in peatland conservation. Our aim is to secure a representative sample of intact peatlands for future generations to enjoy. Only 18% of Ireland's original range of peatland habitats are deemed worthy of conservation. 82% has become degraded from multiple pressures such as peat extraction, habitat fragmentation and development.

Our work is guided by our 6th Action Plan, *Ireland's Peatland Conservation Action Plan 2020*, which was published in 2009. A copy of this document is available for download on our website at [www.ipcc.ie](http://www.ipcc.ie). Many of the actions in our plan have been included within the *National Peatlands Strategy* which has been adopted by every government department and Local Authority. In addition the IPCC work with the peat industry through our involvement in the International Peatland Society. Together we have signed up to the *Strategy for Sustainable Management*. A key principle of this document is the sustainable management of all peat resources.

The IPCC are not inherently opposed to the construction of wind farms. We acknowledge Ireland's need to change from using poisonous fossil fuels to a fully sustainable energy network, but, any proposed development should only be given planning permission subject to a stringent desire to do the construction works and after-use rehabilitation and monitoring using ecologically safe and sound scientific methods and best practice.

### Intact Raised Bog Habitat

Through a desktop study, the IPCC have identified a number of intact raised bog remnants that we would be very concerned about both within and on the boundary of the wind farm. Ireland has an international obligation to protect ANNEX I habitats under the Habitats Directive transposed into Irish law in 1997 of which raised bog is a priority.

### Within the Boundary:

Lough Bawn pNHA is located at Grid Reference N 10300 64000. This is an internationally important site that is within the boundary of the proposed wind farm. The IPCC would like to point out that this site is known to be sensitive and has already suffered from a reduced water level. As this is a designated site it is imperative that it must be protected from development, drainage and nutrient enrichment. Conservation management of this area should be a priority and any development given planning permission must also deliver a rehabilitation plan. This is an opportunity to boost Ireland's

**OVER 30 YEARS TAKING ACTION FOR BOGS AND WILDLIFE**

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

Company Secretary/*Rúnaí Comhlacht*: Rachel Kavanagh

Directors/*Stiúrthóir*: Martin Kelly, Catherine O'Connell, Rachel Kavanagh, Kate Macnamara, Jennifer Roche, Seán Ó Fearghail, Stephen Bray

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

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

conservation status which is a vitally important goal of the *National Peatlands Strategy*.

At Grid Reference N 02695 71489 there is raised bog remnant which needs to be assessed for potential damage arising from drainage and other detrimental effects caused by construction and improper or non-existent after-use rehabilitation. This area must have an eco-hydrological survey undertaken as it contains ANNEX I habitats (7110 and 7120). These are priority habitats and if left to degrade would work against Ireland and our aim for sustainable energy production. This would be a wise use of degraded peatlands and would increase Ireland's peatland conservation status.

#### **Outside the Boundary:**

Clontamore Bog (Grid Ref. N 08039 65995), while on the perimeter of the proposed site, should be examined and have a management plan initiated. The road (R398) may be used during the construction phase and the increased traffic may cause subsidence and pollution. The IPCC would also like to know if there will be peat stability and hydrology tests carried out to ensure that any problems will be foreseen prior to construction relating to this remnant. I would also like to point out that Wetland Surveys Ireland has not yet conducted a survey for this site and this should be completed before any construction is underway by the developer.

Lehery Bog (Grid Ref. N 07887 65369) is an intact raised bog remnant that has been earmarked for an habitat survey by Wetland Surveys Ireland, which has not yet been conducted. The IPCC would like this to be carried out by the developer before any construction works so as to ensure that any habitats important nationally and internationally are properly recorded and taken into account alongside peat stability and hydrology studies. This is to ensure that this remnant is not destroyed during construction and any possible after effects arising from the construction are properly mitigated.

At Grid References N 07182 65965 and N 05219 70174 there are remnants of raised bogs which may be affected by the construction of Wind Turbine No. 20 and 11 respectively. The IPCC would like these areas to be studied for possible issues regarding peat stability and hydrology. If these remnants are destroyed or drained it could become a carbon source rather than a carbon sink. We would like to know what management procedures will be incorporated into the development to ensure that these habitats, which are outside the boundary of the proposed wind farm, will not be destroyed.

Ballynakill South is a wetland area located at Grid Reference N 04492 72136. This has not yet been surveyed by Wetland Surveys Ireland and is very close to Turbine No. 6. The IPCC would like a habitat survey to be undertaken by the developer along with peat stability and hydrology tests both in the site and within the wind farm boundary. This is to ensure that the proposed wind farm development will not adversely affect any national or internationally important species and habitats.

In relation to turbines 6, 11 and 20 IPCC suggest these should be excluded from the proposed developed due to their proximity of raised bog habitat and its associated habitat and avifauna.

Corlea Bog (Grid Ref. N 10220 62657) is a nationally important peatland habitat that has had rehabilitation measures put in place to rewet and preserve archaeological information and internationally important habitat. The IPCC would like to know what management techniques the proposed Derryadd wind farm will use to ensure that this important site does not suffer any detrimental effects from the construction of the turbines and/or drainage of the surrounding area. As this is a tourist attraction, there is also the visual impact on this unique site.

#### **Archaeology**

Peatlands in Ireland hold a great deal of cultural and ancestral history, preserved in the anaerobic conditions. The proposed Derryadd Wind Farm boundary contains up to 100 recorded National Monuments. Ireland has international obligations under the European Convention on the Protection of the Archaeological Heritage, ratified by Ireland in 1997. Article 1 of this convention states that Ireland must "*protect the archaeological heritage as a source of the European collective memory and as an instrument for historical and scientific study*". The IPCC would like to know if there will be scientific supervision from an independent body that will evaluate the proposed wind farm area for its archaeological importance. The IPCC could not support the development before a full archaeological survey is undertaken and the necessary precautions and mitigations are in place to ensure that no loss of archaeological information and cultural history happens. We are particularly concerned about the proximity of Turbines No's 9, 14 and 22 to National Monuments and suggest these be omitted from the proposal in the interests of protecting the complex archaeological heritage of the site. In relation to best practice, we need clarification as to whether the methods being used to conserve the Corlea Iron Age Trackway - rewetting - will be used to protect the significant archaeology of this site.

#### **Water Framework Directive Status of Rivers**

In accordance with the Water Framework Directive, Ireland's rivers, lakes, groundwater and coastal regions must be scientifically deemed to be of "good ecological status". Notably in the area of the proposed wind farm the Kilnacarrow

River and Shannon (upper) River have both been recorded as being of "poor ecological status" during the 2010-2015 cycle of reporting. If the rivers are to improve and meet Ireland's legal requirements then pollution control on the proposed wind farm is a must. In addition to these two rivers, there are others such as the Ballynakill 26, Rappareehill and Derrygeel rivers that traverse the proposed site but have not been assigned for monitoring within the Water Framework Directive. These rivers should be surveyed for baseline data as the levels of pollution in them are not known and they could be contributing organic particles or toxic chemicals via leeching from the degraded peatlands into Lough Ree (which is designated as an SAC and SPA). Any construction work on the degraded peatlands may exacerbate any problems and lower Ireland's water quality status. It is of vital importance that a full inventory of the local water courses is undertaken and the current levels of pollution and possible levels of increase taken into account before any planning permission is awarded. The IPCC could not support a development that does not take Ireland's involvement with international directives seriously.

### **Rehabilitation of the Derryadd Bog Complex**

It is not clear at this stage what rehabilitation of the Derryadd Cutover bog is going to take place alongside the proposed wind turbine installation. Bord an Mona talk about best practice in this regard but there are no published guidelines available for scrutiny. This is a question that needs to be addressed transparently in this development. It has a bearing on the biodiversity status of the wind farm, the amenity that is to be provided locally and the conservation of raised bog remnants within the site. We are aware that the ecology teams within Bord na Mona would have both habitat and predictive habitat maps for an area such as this. Although we requested information we did not receive it. It needs to be included within the planning application so that we can be certain that this "green" development is benefiting both Ireland's clean energy resource and our commitments on the after-use of peat mined sites.

### **Bats**

The proposed wind farm is situated in an area with many species of ANNEX IV bat recorded. The National Biodiversity Data Centre has recordings of Soprano Pipistrelle, Nathusius Pipistrelle, Leisler's Bat and Daubenton's Bat in the area and this needs due consideration within the planning application.

### **Birds**

Birdwatch Ireland's Species Sensitivity Score study has shown that the South-West portion of the proposed Derryadd Wind Farm is an area that may place bird species at risk from wind farms. With Lough Ree close by to the site there are many wetland species of birds that may be at risk. Specifically, Whooper Swan and breeding Black Headed Gulls have been examined by Birdwatch Ireland to be at risk in this area. This needs careful thought throughout the planning process.

### **Derryadd and Mount Lucas Wind Farm**

IPCC are aware of the extensive public awareness and amenity programmes associated with the Mount Lucas Wind Farm developed by Bord na Mona. What plans in this regard, if any are proposed for Derryadd. We are aware of a considerable interest among Local Authorities and communities in this area in relation to the establishment of a Mid-Shannon Wilderness Park and initiatives to reintroduce the Crane to Ireland within this region. How does the Derryadd wind Farm development propose to dovetail with these plans?

Thank you for taking the time to listen to our concerns.



Tristram Whyte B.Sc (hons) Applied Freshwater & Marine Biology  
Conservation, Policy & Fundraising Officer

### **References:**

National Peatlands Strategy, The Department of Arts, Heritage and the Gaeltacht, 2015.





CARING FOR ALL ANIMALS

An Cumann Éireannach um Fhóirithint ar Ainmhithe  
The Irish Society for the Prevention of Cruelty to Animals

Head Office  
National Animal Centre  
Derryglogher Lodge  
Keenagh  
Co. Longford  
N39X 257  
Ireland

T: 043 33 25035  
E: info@ispca.ie

[www.ispca.ie](http://www.ispca.ie)

Siobhán Tinnelly  
Associate Director  
TOBIN Consulting Engineers  
Block 10-4  
Blanchardstown  
Dublin 15  
D15 X98N

19<sup>th</sup> May 2017

Re: Proposed Development of Derryadd Wind Farm, Co. Longford (2<sup>nd</sup> Consultation Letter).

Dear Ms Tinnelly,

Thank you for your letter dated 27<sup>th</sup> April 2017. This is the first and only letter we have received from Tobin but I note that you refer to your letter of that date as '2<sup>nd</sup> Consultation Letter'.

The ISPCA has only recently become aware of the proposed development and met with Sean Creedon and Karina Dennigan of Bord na Mona on Wednesday 3<sup>rd</sup> May who gave an overview of the development. I believe that notification of the proposed development was advertised in the local press some time ago, but the ISPCA was not aware of it. At the meeting with Bord na Mona, I raised the ISPCA's concerns that we were not notified directly about the proposed development at an earlier juncture.

The ISPCA supports the development of renewable energy and we are concerned about the impact of climate change on the environment. We also recognise that the Irish government has targets to achieve in terms of renewable energy in relation to various protocols. However, we do have concerns about the proposed Derryadd Windfarm due to the close proximity of three turbines to the ISPCA's property at Derryglogher, the closest of which will be situated just 650m from the centre of our land.

Whilst we understand that an ecological impact survey has been carried out and will be included in the proposal, which I believe is to be submitted in September, we are concerned about the impact of the turbines on the animals being rehabilitated at our centre. These include up to 40 equines all of which have been seized or surrendered to ISPCA Inspectors as a result of being cruelly treated or neglected. Many have come from very poor conditions and are already nervous and stressed. Some may also be immuno-suppressed as a result of their condition.

I am aware of the body of research into the impacts of wind turbines on birds, bats and terrestrial wild mammals, but there is a paucity of research into the impacts of wind turbines on domesticated animals, livestock and equines. Although there is no direct evidence of negative impacts of wind turbines on this group of animals, lack of evidence of any impact is not evidence of a lack of impact.

DIRECTORS: Carin Bryans, Helen Dooley (Chairperson), Mandy Johnston, Tracey Long, Marie O'Byrne, Noel O'Donoghue, Elizabeth O'Flynn, Olivia Packerham, Fiona Squibb. ISPCA and An Cumann Éireannach um Fhóirithint ar Ainmhithe are the registered business names of The Irish Society for the Prevention of Cruelty to Animals, a company limited by guarantee, registered in Ireland with the company number 460571, charity number CHY5619 and registered charity number 20008734; and registered office as above.

It is possible that equines would become habituated to the noise of the turbines over time, but more research is required on the impacts of turbines on vulnerable groups of animals such as the nervous / stressed equines cared for at the ISPCA centre in Derryglogher.

The ISPCA at this stage must remain cautious and our default position is that unless there is sufficient evidence to show that there will be no, or negligible negative effects on our equines, we will remain opposed to the siting of the three turbines planned for the immediate vicinity.

The ISPCA has not had sufficient time to conduct a complete review of the literature surrounding the impact of noise pollution from wind turbines. However, the British Horse Society has recommended that: “The potential effect of turbines on horses should be considered on any route used by them – this includes bridleways, byways, roads and permissive routes – *and on businesses where horses are kept or trained.*”<sup>1</sup> We entrust that sufficient consideration will be given to the impact of the proposal on the equines in our care. In the absence of information on the impact on vulnerable animals, we would like to suggest that Bord na Mona commission independent research into this issue. In the absence of such research, the ISPCA will oppose the proposal and in the event that the proposal is successful will be seeking to have the three closest turbines relocated or removed from the proposal completely.

If you wish to discuss the contents of this letter please do not hesitate to contact me.

Yours sincerely,



Dr Andrew Kelly,  
ISPCA Chief Executive Officer

<sup>1</sup>The British Horse Society 2015. Advice on Wind Turbines and Horses – Guidance for Planners and Developers.

Ms. Siobhán Tinnelly  
 Associate Director  
 TOBIN Consulting Engineers (on behalf of Bord na Móna Powergen) Ltd  
 Block 10-4  
 Blanchardstown Corporate Park  
 Dublin 15  
 D15 X98N

Date/Dáta: 10 May 2017  
 Our Ref: TII17-97530  
 Your Ref: 8057-Correspondence (No. 2)

<b>TOBIN CONSULTING ENGINEERS</b>		
PROJECT NO:		
FILE REF:		
Date Received	11 MAY 2017	
ISSUED TO		DATE

Re: EIS Scoping relating to proposed Wind Farm at Derryadd Wind Farm, Co. Longford

Dear Ms. Tinnelly

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

The Authority notes the proposed site extents extend to the north and south of the N63, national secondary road, at a location on the network that is subject to a general 100kph speed limit. In such circumstances, the developer/applicant should be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply.

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

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

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

The developer should have regard, *inter alia*, to the following;

- Consultations should be had with the relevant Local Authority/Roads Design Office with regard to locations of existing and future national road schemes,
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, i.e. N63,
- The developer should assess visual impacts from existing national roads,
- The developer should have regard to any Environmental Impact Statement and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in

particular have regard to any potential cumulative impacts,

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

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

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

Yours sincerely

  
Michael McCormack  
Senior Planner



## Siobhan Tinnelly

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**From:** Siobhan Power <Siobhan.Power@DCCAIE.gov.ie>  
**Sent:** 19 May 2017 12:15  
**To:** Siobhan Tinnelly  
**Cc:** Sarah Gatley; Michael Whitelaw  
**Subject:** Derryadd Wind Farm Co. Longford

**Re: Proposed Development of Derryadd wind farm, Co. Longford.**

**Your ref: 8057 Correspondance (No. 2)**  
**Our ref: 17/37 (cf. 16/115)**

Dear Siobhán,

Thank you for your letter dated 27<sup>th</sup> April 2017 concerning the above proposed development.

I would like to confirm that the Geological Survey Ireland will be making no comments in addition to those made in our letter dated 27<sup>th</sup> September, 2016, sent in response to the scoping document.

With kind regards,  
Siobhán.



**Dr Siobhán Power Geologist Geoheritage**

Geological Survey Ireland, Beggars Bush, Haddington Road, Dublin D04 K7X4, Ireland.

T +353 (0)1 678 2678 M +353 (0)87 9600606 E [siobhan.power@gsi.ie](mailto:siobhan.power@gsi.ie) [www.gsi.ie](http://www.gsi.ie)

*A division of the Department of Communications, Climate Action & Environment.*

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Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach. Deimhnítear leis seo freisin nár aims odh víreas sa phost seo tar éis a scanadh.

## Siobhan Tinnelly

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**From:** Siobhan Tinnelly  
**Sent:** 14 August 2017 11:01  
**To:** 'Irish Peatland Conservation Council'  
**Cc:** Padraig Cregg; 'martin@archconsultancy/td.com'  
**Subject:** Irish Peatland Conservation Council - Follow up on Submission (Derryadd WF)

Good Morning Mr. Whyte,

I can confirm that we received the IPCC submission in relation to the proposed Derryadd Wind Farm project on May 19th 2017.

Your submission was circulated to the project team and, in particular, to the project ecologist and archaeologist.

I wish to let you know that there will be a delay in the submission of the proposed planning application.

The delay arises from the recent announcement of the “preferred draft approach” to the Wind Energy Development Guidelines by the Department of Housing, Planning, Community and Local Government, in conjunction with the Department of Communications, Climate Action and Environment (June 13th 2017). This has given rise to the need to assess the potential impact that these proposed amendments may have on the project.

This assessment is currently in progress and we will write to you again in due course to let you know of any changes to the proposed development.

Regards,

Siobhán Tinnelly

---

**From:** Irish Peatland Conservation Council [mailto:bogs@ipcc.ie]  
**Sent:** 04 August 2017 15:29  
**To:** Siobhan Tinnelly  
**Subject:** Irish Peatland Conservation Council - Follow up on Submission (Derryadd WF)

Dear Ms Tinnelly,

Could you please confirm receipt of the IPCC's submission on the Derradd WF Scoping report sent 19th May. Could you also inform us of any changes made to the report since we made our submission.  
All the best

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

045 860133  
[bogs@ipcc.ie](mailto:bogs@ipcc.ie)

Visit the Bog of Allen Nature Centre this year and take a step back in time and enjoy a guided tour of the peatland exhibitions, explore the wildlife gardens and discover insect eating plants, get hands on and pond dip for freshwater mini-beasts or search for newts and frogs and visit Lodge Bog to make new

bog memories as you watch for darting dragonflies or listen for the cry of the curlew. Open Monday-Friday 10am-4pm. Admission €5 per adult, families €15. Further information visit [www.ipcc.ie](http://www.ipcc.ie)

## Siobhan Tinnelly

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**From:** Rita Connaughton <rconnaughton@longfordcoco.ie>  
**Sent:** 18 May 2017 14:29  
**To:** Siobhan Tinnelly  
**Cc:** Donall Mac An Bheatha  
**Subject:** Derryadd Windfarm, Co. Longford

Dear Siobhan,

Thank you for your consultation letter received in Longford County Council on 28<sup>th</sup> April 2017

It should be noted that at the moment Longford County Council does not have a Renewable Energy Strategy in place as outlined in Section 5.5.2 Policy RE1 Of the County Development Plan.

In relation to the proposed development from a Longford Planning Department point of view only, there are a number of items which we would like to make you aware of, they are as follows:

1. The Longford County Development Plan Annex 6 introduces a proposal to develop a Mid Shannon Wilderness Park. The Mid Shannon Wilderness Park covers a large area of land from Lough Ree through to the Royal Canal and also includes the Rivers Shannon, Inny and Camlin. Some work in realising this is about to commence on the site of the Corlea track way and its subsequent connection to the Royal Canal. The proposed wind farm is set wholly within this proposed Mid Shannon Wilderness Park and to the North of the Corlea project. As such all proposed developments must be cognisant of the policies and objectives relating to the Mid Shannon Wilderness Park .
2. Section 5.5.2 deals with Renewable Energy Sources and as such the policy therein should form part of the early planning consultation process.
  - a. Section 5.5.2.1 deals specifically with Wind Energy within a Longford context and contains four specific policies. They are as follows
    - i. **WD 1:** Developments for wind farms will be encouraged to locate in those areas identified as having wind potential within the County, as defined on the Map contained in Appendix 5.
    - ii. **WD 2:** Proposals for large scale industrial wind farm developments shall be directed to areas of cutaway bogs subject to the following;
      - Dependent on the completion of an investigation demonstrating suitability of the areas,
      - The preparation of revised Wind Energy Development Guidelines and the Renewable Energy Export Policy and Development Framework
      - Compliance with the necessary environmental assessments
    - iii. **WD 3:** Micro wind turbines producing below 20 kilowatts for domestic purposes shall be considered favourably. The following criteria shall apply.
      - Not either individually or cumulatively, adversely affect the health or amenity of nearby communities;
      - Be visually and environmentally acceptable
      - Require minimum further construction to link readily into existing transmission lines
    - iv. **WD4:** In assessing an application for a wind farm the following shall be taken into consideration:-



- Visual impact - both on site and over extensive areas. Applications may be required to include photo or video montages - taken from a variety of locations after discussion with the Planning Authority. Site cross sections showing existing and proposed ground levels in relation to all structures on site are required. Ideally they should be sited against a backdrop of a hill or elevated area. Non linear type layouts are favourable. Windfarms should not be intervisible from one another.
- Predicted Noise Levels - developments must ensure that noise levels will not be intrusive in relation to background noise at the nearest dwelling. Blades, of single speed must rotate in the same direction. Monitoring noise levels at selected locations generally for the first year of operation of the wind farm will be a condition of planning permission. Manufacturer's certification of noise emissions will be required at application stage.
- Design - Solid towers should be used throughout the windfarm, which should be of the same height and colour. Advertising material including the manufacturer's name or logo will not be permitted on the wind turbine.
- Impact of associated site works - including access roads, substations, grid connections, fencing etc. Details of proposed grid connections are required at application stage. Consideration should be given to the potential landscape impacts in the context of grid connections taking into account technical feasibility and economic viability, particularly in environmentally sensitive locations. Access roads shall be un-surfaced and follow natural contours of the site. Fencing will not be permitted on any part of the site except normal livestock fencing when the land is part of an operating agricultural holding.
- Construction - a detailed phased programme for the construction together with estimates of traffic generation is required at application stage. Consideration will be given to the potential damage to roads during the construction phase. In some cases access routes may be restricted by planning condition.
- Proximity to Dwellings - Wind turbines should generally not be located within 500m of any dwelling but this may vary from site to site.
- Interference with navigation, television and communication signals – A communications booster may also be required or some other technical solution. Air and sea navigation authorities may be consulted for their comments on proposed wind farm developments.
- Impact on environmental designations - Amenity areas, Sensitive landscapes, views and prospects, Designated Tourist Areas, Natural Heritage Areas, Special Protection Areas, Special Areas of Conservation, Archaeological site, biodiversity, protected structures, national monuments etc. Wind farm developments should not be located within 100 metres of ancient monuments. The impact on migratory birds, in particular, will be assessed in consultation with the Irish Wildbird Conservancy (*BirdWatch Ireland*).
- Decommissioning - proposals for restoration of the site after removal of the turbines should be included with an application. Adequate financial security will be required by planning condition.
- Sensitivity of locations of folklore, mythology and religious significance to these developments. Evidence of consultation with local community groups is an important element of planning for such a project. Developers will also be required

to assess their proposals for the impact of shadow flicker on dwellings and this information should accompany the planning application.

- Location relative to water bodies. Wind farm developments should not be located within 150m of lakes or rivers.
- Applicants are advised to outline future extension proposals if known. It should be noted that temporary permissions for an anemometer is without prejudice to any subsequent application for a wind farm. Where appropriate, the Planning Authority may request additional information in determining an application for a wind farm development, including detailed information similar to that required as part of an Environmental Impact Assessment (EIA).

### **3. Section 6 of the Development Plan deals with Environment, Heritage and Amenities**

The whole chapter is important and refers to conservation and protection of the environment, green infrastructure, landscape character assessment, water quality, protection of archaeological, natural and built heritage and natural and recreational amenities, particular regard should be had to Section 6.2.2.7 Inland Lakes and Waterways and the Policies ILW1 to ILW17 relating to the protection of Longford's Inland Waterways.

### **4. The Local Economic and Community Plan**

- a. The LECP should also be taken into consideration in relation to the economic and community development of the County.

It should be noted that the above is not an exhaustive list, however, should be given due consideration.

Regards,  
Rita Connughton  
Planner  
Longford County Council

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S?ANADH: Is d'?s?id an duine/na ndaoine chuig a bhfuil s? seolta agus sin amh?in at? an teachtaireacht seo. D'fh?adfadh go bhfuil faisn?is faoi phribhl?id n? faoi r?n de r?ir bhr? an dl? is infheidhme inti. Mura tusa an seola? a bh? beartaithe, b? ar an eolas go bhfuair t? an r?omhphost seo de bharr earr?ide agus go bhfuil cosc ioml?n ar an r?omhphost seo, n? aon chuid de, a ?s?id, a scaipeadh, a chur ar aghaidh n? a ch?ipe?il. M? fuair t? an r?omhphost seo de bharr earr?ide, t?igh i dteagmh?il leis an seolt?ir chomh luath agus is f?idir, le do thoil. N? g? gurb ionann na dearca? a l?ir?tear sa r?omhphost seo agus dearca? Chomhairle Chontae an Longfoirt. T? aon iat?in seice?ilte ag scan?ir v?ris agus dealra?onn s? go bhfuil siad glan. B? cinnte go nd?anfaidh tusa scan?il ar gach teachtaireacht chomh maith, le do thoil, mar n? ghlacann Comhairle Chontae an Longfoirt. dliteanas ar bith i leith ?illi? n? d?m?iste do do chuid c?ras.

Mr. Eoin O'Mullane  
Tobin Consulting Engineers  
Block 10-4  
Blanchardstown Corporate Park  
Co. Dublin  
D15 X98N

Dáta | Date  
18 April 2018

Ár dTag | Our Ref.  
TI18-101410

TOSIN CONSULTING ENGINEERS	
PROJECT NO:	
FILE REF:	
Date Received	19 APR 2018
PASS TO	
DATE	
BhuidTag   Your Ref.	8057-Correspondence (No. 3)

RE: EIAR Scoping relating to proposed Derryad Wind Farm, Co. Longford

Dear Mr. O'Mullane,

Thank you for your letter and enclosures of 9 April 2018 regarding the above development. Transport Infrastructure Ireland's (TII) position is outlined as follows.

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

TII notes the proposed site extents extend to the north and south of the N63, national secondary road, at a location on the network that is subject to a general 100kph speed limit. In such circumstances, the developer/applicant should be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new developments or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply.

This issue has previously been advised in earlier EIS/EIAR Scoping responses made by TII on this proposal. Therefore, the developer/applicant should consider access to the proposed development in the context of official policy which is outlined in Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines (2012) and avoid proposals that conflict with the provisions of the foregoing official policy.

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

With respect to EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of EIAR, which may affect the National Roads Network.

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

- Consultations should be had with the relevant Local Authority/Roads Design Office with regard to locations of existing and future national road schemes.


Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag [www.tii.ie](http://www.tii.ie).  
TII processes personal data in accordance with its Data Protection Notice available at [www.tii.ie](http://www.tii.ie).

- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, i.e. the N63.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any Environmental Impact Statement and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts.
- The developer, in conducting EIAR, should have regard to TII Publications.
- The developer, in conducting EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the *Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes* (National Roads Authority, 2006).
- The EIAR should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see *Guidelines for the Treatment of Noise and Vibration in National Road Schemes* (1<sup>st</sup> Rev., National Roads Authority, 2004)).
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. TII's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the TII TTA Guidelines which addresses requirements for sub-threshold TTA.
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- In relation to haul route identification, the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed.
- In relation to cabling and potential connection routing, the scheme promoter should note locations of existing and future national road schemes and develop proposals to safeguard proposed road schemes. In the context of existing national roads, the developer should be aware that separate approvals may be required for works traversing the national road network. TII requests referral of any agreements between the local authority and the scheme promoter related to national roads. Alternatives to use of the national road for cabling should be investigated.

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

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

Yours sincerely,

P.P.   
 Michael McCormack  
 Senior Land Use Planner