

# **APPENDIX A-2**

## **Statutory and Non-Statutory Consultation and Responses**

- Appendix A-2(i)    Preliminary Consultation Document and Consultee Responses**
- Appendix A-2(ii)    Second Consultation Document and Consultee Responses**

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# **Appendix A-2(i)**

## **Preliminary Consultation Document and Consultees Responses**

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16<sup>th</sup> Apr 2019

To whom it may concern,

**RE: Scoping for Drumnahough Wind Farm, townlands of Cark, Meenasaura and Carrickalangan, Co Donegal**

Drumnahough is a previously consented 15 turbine wind farm site (08/50687) which expired 29<sup>th</sup> March 2019. Due to grid unavailability, the project did not implement its permission. SSE Renewables Ireland Ltd and Coillte CGA now wish to submit a new planning application for a revised layout. Given the time since the original consent in 2009 market environment and technology has greatly changed. Therefore, in order to develop a feasible project, the new application will not exceed the original turbine numbers but will be based on a revised turbine envelope.

The proposed wind farm at Drumnahough is located approximately 13 km south west of Letterkenny in County Donegal. No part of the site lies within a designated area. The site boundary is 270 m from Meentygrannagh Bog to the west, which is designated a Special Area of Conservation (SAC) and a Natural Heritage Area (NHA). Another NHA, Tullytresna Bog, adjoins the southwestern boundary and is located 175 m from the nearest turbine. The River Finn, which drains the area to the south of the site, is an SAC.

I am writing to invite you to provide comments on the scope of the EIAR and the specific standards of information you require. Included is a proposed site boundary map and an indicative layout which following completion of all surveys is subject to change.

As you are aware comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of the proposed development and its potential effects on the environment and provides initial feedback in the early stages of the project, when alterations are still easily incorporated into the design. In this way scoping not only informs the content and scope of the EIAR, it also provides a feedback mechanism for the proposal design itself.

If you have any questions or require any further information, please contact me on any of the details below.

Yours Sincerely

**Michelle Donnelly**

**Consent Manager**

Direct Dial: 02882 253945

E: michelle.donnelly@sse.com

**SSE Renewables (Ireland) Limited is part of the SSE Group**

The Registered Office of SSE Renewables (Ireland) Limited is Red Oak South, South County Business Park, Leopardstown, Dublin 18, Ireland

Registered in the Republic of Ireland No. 331742

Directors: Barry Kilcline, Barry O'Regan, James Smith (British)

Tel: +353-1-6556 400 Web: www.sse.com



Our Ref: **G Pre00149/2019**  
(Please quote in all related correspondence)

19 July 2019

Michelle Donnelly  
Consent Manager  
Consenting Team  
SSE Renewables (Ireland) Limited  
Red Oak South,  
South County Business Park,  
Leopardstown,  
Dublin 18

Via email: [michelle.donnelly@sse.com](mailto:michelle.donnelly@sse.com)

**Re: Scoping for Drumnahough Wind Farm, townlands of Cark, Meenasaura and Carrickalangan, County Donegal**

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in connection with the above.

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

### **Nature Conservation**

The Department refers to the request by Michelle Donnelly, Consent Manager for SSE renewables (Ireland) Limited (letter of 29<sup>th</sup> April 2019) regarding the scope of an Environmental Impact Assessment Report (EIAR) for a wind farm development at Cark, Meenasaura and Carrickalangan, County Donegal.

Please find below general scoping comments for EIAR, Appropriate Assessment (AA) screening and licensing requirements, followed by specific comments regarding the site in question.

These observations are intended to assist you in meeting the obligations that may arise in relation to European sites, other nature conservation sites, and biodiversity and environmental protection in general in the context of the current application. The observations are not exhaustive, and are made without prejudice to any recommendation that may be made by this Department in the future. Data collected and surveys carried out



in connection with this proposed development may raise other issues that have not been considered here.

The National Parks and Wildlife Service (NPWS) website has recently been updated and should be consulted with regard to the impact of planning and development on nature conservation. The following link gives extensive details on the standards and content the Department requires from applications: <https://www.npws.ie/development%20consultations>.

#### EIAR:Ecological survey

With regard to scoping for an EIAR for a proposed development, in order to assess impacts on biodiversity, fauna, flora and habitats an ecological survey should be carried out of the proposed development site including the route of any access roads, pipelines or cables etc. to survey the habitats and species present. Any improvement or reinforcement works required for access and transport anywhere along any proposed haul route(s) should be included in the EIAR and subjected to ecological impact assessment with the inclusion of mitigation measures, as appropriate. Where bridges require strengthening this may involve grouting of crevices which may function as bat roosts. Where ex-situ impacts are possible survey work may be required outside of the development sites. Such surveys should be carried out by suitably qualified persons at an appropriate time of the year depending on the species being surveyed for. The EIAR should include the results of the surveys and detail the survey methodology and timing of such surveys. It is expected by this Department that best practice will be adhered to with regard to survey methodology and if necessary non Irish methodology adapted for the Irish situation. The EIAR should cover the whole project, including construction, operation and, if applicable, restoration or decommissioning phases. Alternatives examined should also be included in the EIAR. Inland Fisheries Ireland (IFI) should be consulted with regard to fish species if applicable. For information on Geological and Geomorphological sites the Geological Survey of Ireland should be consulted.

Specific reference should be made to the National Biodiversity Plan and any relevant County Biodiversity Plan. Any losses of biodiversity habitat associated with this proposed development (including access roads and cabling etc.) such as woodland, scrub, hedgerows and other habitats should be mitigated for.

In order to assess impacts it may be necessary to obtain hydrological and/or geological data. Any impact on water table levels or groundwater flows may impact on wetland sites some distance away. The EIAR should assess cumulative impacts with other plans or projects if applicable. Where negative impacts are identified suitable mitigation measures should be detailed as appropriate.

#### EIAR:Hedgerows and related species

Hedgerows should be maintained where possible as they form wildlife corridors and provide areas for birds to nest in; hedgerow trees may provide roosting places for bats. Badger setts may be present. Hedgerows also provide a habitat for woodland flora. The



EIAR should provide an estimate of the length of any hedgerow that will be lost. Where it is proposed that trees or hedgerows will be removed there should be suitable planting of native species in mitigation incorporated into the EIAR. Where possible, hedgerows and trees should not be removed during the nesting season (i.e. March 1<sup>st</sup> to August 31<sup>st</sup>). Bird's nests can only be intentionally destroyed under licence issued under the Wildlife Acts of 1976 to 2012.

#### EIAR: Watercourses and wetlands

Wetlands are important areas for biodiversity and ground and surface water quality should be protected during construction and operation of the proposed development. Any watercourse or wetland impacted on should be surveyed for the presence of protected species and species listed on Annexes II and IV of the Habitats Directive. These species could include otters (*Lutra lutra*), which are protected under the Wildlife Acts and listed on Annexes II and IV of the Habitats Directive, salmon (*Salmo salar*) and Lamprey species listed on Annex II of the Habitats Directive, Freshwater Pearl Mussels (Margaritifera species) and White-clawed Crayfish (*Austropotamobius pallipes*) which are protected under the Wildlife Acts and listed on Annex II of the Habitats Directive, Frogs (*Rana temporaria*) and Newts (*Trituris vulgaris*) protected under the Wildlife Acts and Kingfishers (*Alcedo atthis*) protected under the Wildlife Acts and listed on Annex I of the Birds Directive (Council Directive 79/409 EEC).

One of the main threats identified in the threat response plan for otter is habitat destruction (see [https://www.npws.ie/sites/default/files/publications/pdf/2009\\_Otter\\_TRP.pdf](https://www.npws.ie/sites/default/files/publications/pdf/2009_Otter_TRP.pdf)). A 10m riparian buffer on both banks of a waterway is considered to comprise part of the otter habitat. Therefore any proposed development should be located at least 10m away from a waterway.

#### EIAR: Bats

Bat roosts may be present in trees, buildings and bridges. Bat roosts can only be destroyed under licence under the Wildlife Acts and derogation under the Birds and Natural Habitats Regulations and such a licence would only be given if suitable mitigation measures were implemented. Any proposed migratory bat friendly lighting should be proven to be effective.

#### EIAR: Alien invasive species

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

#### EIAR: Bird surveys

Survey methodologies should follow best practice and if necessary be modified to reflect the Irish situation. Two full years of bird surveys is normally considered to be necessary.





When survey results are being presented In an EIAR it is important that best practice is followed and that the full survey methodology, including dates and times are detailed. Furthermore, it is expected that bird survey data should be presented in context and records should be supported by basic environmental data such as hourly estimates of visibility, glare arcs, cloud cover and precipitation during Vantage Point (VP) and walk over survey periods. Consideration should be given to the use of Viewshed or similar software. Results for species need to be referenced back to the overall populations and their dynamics as, in some cases even a small risk to a population of a species could be considered significant. It is important that seasonal bird migration routes are considered as well as routes of birds travelling on a daily basis between roosting and feeding areas.

#### EIAR: Impact assessment

The impact of the proposed development on the flora/fauna and habitats present should be assessed with particular regard to:

Natura 2000 sites, i.e. Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) and Special Protection Areas (SPA) designated under the EC Birds Directive (Directive 2009/147 EC), other designated sites, or sites proposed for designation, such as Natural Heritage Areas and proposed Natural Heritage Areas, Nature Reserves and Refuges for Fauna or Flora designated under the Wildlife Acts 1976 to 2012, species protected under the Wildlife Acts including protected flora, 'Protected species and natural habitats', as defined in the Environmental Liability Directive (2004/35/EC) and European Communities (Environmental Liability) Regulations, 2008 including Birds Directive - Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur) and Habitats Directive - Annex I habitats, Annex II species and their habitats, and Annex IV species and their breeding sites and resting places (wherever they occur), important bird areas such as those identified by Birdlife International, features of the landscape which are of major importance for wild flora and fauna, such as those with a "stepping stone" and ecological corridors function, as referenced in Article 10 of the Habitats Directive, other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plans and County Development Plans), Red data book species, and biodiversity in general.

Complete project details including Construction Management Plans (CMPs) need to be provided in order to allow an adequate EIAR and appropriate assessment to be undertaken. Applicants need to be able to demonstrate that CMPs and other such plans are adequate and effective mitigation supported by scientific information and analysis and that they are feasible within the physical constraints of the site. The positions, locations and sizes of construction infrastructure and mitigation such as settlement ponds, disposal sites and construction compounds may significantly affect European and other designated sites, habitats and species in their own right and could have an effect for example on drainage, water quality, habitat loss, and disturbance. If these are undetermined at time of the assessment all potential effects of the development on the site are not being considered.



#### EIAR: Construction Management Plans

Construction Management Plans should contain sufficient detail to avoid any post construction doubt with regard to the implementation of mitigation measures, timings and roles and responsibilities for same. There can be no doubts or lacunae regarding what is required for mitigation, pre-commencement surveys and or licensing requirements.

Construction work should not be allowed to impact on water quality and measures should be detailed in the EIAR to prevent sediment and/or fuel runoff from getting into watercourses which could adversely impact on aquatic species. See EIAR; Flood Plains for details with regard to flooding risk.

Inland Fisheries Ireland (IFI) should be consulted with regard to impacts on fish species and the applicant may find it useful to consult their publication entitled "Planning for watercourses in the urban environment" which can be downloaded from their website.

If applicants are not in a position to state the exact location and details of cable routes at the time of application, then they need to consider the range of options that may be used within their assessment. Should the exact height and rotor diameter of the turbines not be known at EIAR stage then the assessment of impacts must be applicable to a variety of turbine heights and rotor diameters which could be used. This should be made clear in the EIAR.

It is important to note that unless post decision consultation with the NPWS is specifically stated as a condition of planning, NPWS has no post consent role. However, regional staff are available for liaison regarding any associated licensing requirements and/or new information arising for specific species of concern.

#### EIAR: Cumulative and ex situ impacts

A rule of thumb often used is to include all European sites within a distance of 15km. It should be noted however that this will not always be appropriate. In some instances where there are hydrological connections a whole river catchment or a groundwater aquifer may need to be included. Similarly where bird flight paths are involved the impact may be on an SPA more than 15 km away.

Other relevant Local Authorities should be consulted to determine if there are any projects or plans which, in combination with this proposed development, could impact on any European sites.

#### Appropriate Assessment

In order to carry out the Appropriate Assessment screening, and/or prepare a Natura Impact Statement (NIS), information about the relevant European sites including their conservation objectives will need to be collected. Details of designated sites and species and conservation objectives can be found on <http://www.npws.ie/>. Site-specific, as opposed to generic, conservation objectives are now available for many sites. Each conservation



objective for a qualifying interest (QI) is defined by a list of attributes and targets and is often supported by further documentation. Where these are not available for a site, an examination of the attributes that are used to define site-specific conservation objectives for the same QIs in other sites can be usefully used to ensure the full ecological implications of a proposal for a site's conservation objective and its Integrity are analysed and assessed. It is advised, as per the notes and guidelines in the site-specific conservation objectives that any reports quoting conservation objectives should give the version number and date, so that it can be ensured and established that the most up-to-date versions are used in the preparation of Natura Impact Statements and in undertaking appropriate assessments.

The Departmental guidance document on Appropriate Assessment is available on the NPWS website at [www.npws.ie/sites/default/files/publications/pdf/NPWS\\_2009\\_AA\\_Guidance.pdf](http://www.npws.ie/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf) and in the EU Commission guidance entitled "Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC' which can be downloaded from; [http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura\\_2000\\_assess\\_en.pdf](http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf).

CJEU and Irish case law has clarified some issues and should also be consulted.

#### Post construction monitoring

This Department recognises the importance of pre and post construction monitoring, such as recommended in Drewitt et al. (2006), and Bat Conservation Ireland (2012). The applicant should not use any proposed post construction monitoring as mitigation to supplement inadequate information in the assessment. Please refer to Circular Letter PD 2/07 and NPWS 1/07 on this issue. This can be downloaded from the Department's website <https://www.npws.ie/development-consultations>.

The EIAR process should identify any pre and post construction monitoring which should be carried out. The post construction monitoring should include bird and bat strikes/fatalities including the impact on any such results of the removal of carcasses by scavengers. Monitoring results should be made available to the competent Authority and copied to this Department. A plan of action needs to be agreed at planning stage with the Planning Authority if the results in future show a significant mortality of birds and/or bat species. It is important to note again that unless post decision consultation with the NPWS is specifically stated as a condition of planning, NPWS has no post consent role. However, regional staff are available for liaison regarding any associated licensing requirements and/or new information arising for specific species of concern.

Note: any significant change to mitigation may require amendment and where a licence has expired; there will be a need for new licence applications for protected species.



### Licences

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

It should be noted however that the Regulations of 1997 have since been revoked and that Part 6 of the European Communities (Birds and Natural Habitats) Regulations 2011-2015 is now the relevant part dealing with the protection of flora and fauna. In particular reference to Regulation 23 in the circular letter should be taken to mean Regulation 51 in the current Regulations.

In addition the planning authority will be required to take account of species protected under sections 21, 22 and 23 of the Wildlife Acts if there are any impacts on other protected species or their resting or breeding places, such as on protected plants, badger setts or birds’ nests. They will also need to be cognisant of article 5 (d) of the Birds Directive. For that reason vegetation, including hedges and trees, should not be removed during the nesting season (i.e. March 1<sup>st</sup> to August 31<sup>st</sup>).

In order to apply for any such licences or derogations as mentioned above the results of a survey should be submitted to the National Parks and Wildlife Service section of this Department. Such surveys are to be carried out by appropriately qualified person/s at an appropriate time of the year. Details of survey methodology should also be provided. Should this survey work take place well before construction commences, the Department recommends that an additional ecological survey of the development site should take place immediately prior to construction to ensure no significant change in the findings of the baseline ecological survey has occurred. If there has been any significant change mitigation may require amendment and where a licence has expired, there will be a need for new licence applications for protected species.

### Baseline data

Other sources of habitat and species information beyond those already identified and the standard NPWS data request include (but are not be limited to) the National Biodiversity Data Centre ([www.biodiversityireland.ie](http://www.biodiversityireland.ie)) Inland Fisheries Ireland ([www.fisheriesireland.ie](http://www.fisheriesireland.ie)). BirdWatch Ireland ([www.birdwatchireland.ie](http://www.birdwatchireland.ie)), Irish Raptor Study Group, Golden Eagle Trust and Bat Conservation Ireland ([www.batconservationireland.org](http://www.batconservationireland.org)). Data may also exist at a County level within the Planning Authority.

General guidance and useful references;

1. EU Guidance on Wind Energy Developments and Natura 2000
2. The Departmental Wind Energy Planning Guidelines



3. Windfarms on Peatland (2008-2010) Mires and Peat volume 4
4. Best Practice guidance for Habitat Survey and Mapping by George F Smith, Paul O'Donoghue, Katie O'Hora and Eamon Delaney, 2011. The Heritage Council.
5. Pearce-Higgins, James W., Stephen, Leigh, Langston, Rowena H. W., Bainbridge, Ian P. and Bullman. Rhys (2009). "The distribution of breeding birds around upland wind farms". Journal of Applied Ecology, 46, 1323-1331.
6. Johnson, Gregory D. and Arnett Edward 8. "A Bibliography of Bat Fatality Activity and Interactions with Wind Turbines" (June 2004 updated February 2010) Bat Conservation International.
7. Pearce-Higgins, James W., Stephen, Leigh, Douse, Andy, and Langston, Rowena H. W. (2012). "Greater impacts of wind farms on bird populations during construction than subsequent operation: results of a multisite and multi-species analysis". Journal of Applied Ecology. 49.386-394
8. Rodrigues, Let ai, (2014). "Guidelines for consideration of bats in wind farm projects". Eurobats Publication Series NO.6 UNEP and Eurobats
9. The Departmental guidance document on Appropriate Assessment which is available on the NPWS website at <https://www.npws.ie/protected-sites/guidance-appropriate-assessment-planning-authorities>
10. The EU Commission guidance entitled "Assessment of plans and projects significantly affecting Natura 2000 sites, Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" which can be downloaded from [http://ec.europa.eu/environment/nature/natura2000/management/guidance\\_en.htm](http://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm)
11. Bat Conservation Ireland (2012) Wind Turbine/Wind Farm Development Bat Survey Guidelines. Version 2.8, December 2012
12. Drewitt, Allan Land Longston Rowena H. W. (2006) "Assessing the impacts of wind farms on birds". Ibis 148. 29-42

**Further to the above general comments please find below specific observations relating to the site in question.**

- Any new or revised documentation should be cognisant of the Department's previous observations relating to wind farm development applications in the area, or related applications.
- The mobilisation of peat and or silt is likely during the construction phase and the risks associated with silt entering hydrological pathways and any impacts arising from same (e.g. Fresh Water Pearl Mussel in the River Finn SAC) should be addressed clearly.
- Medium to long term risk to bog sites (e.g. Meentygrannagh Bog and Tullytresna Bog) that are connected via hydrological pathways should be assessed with particular emphasis on prevention of drying out and/or changes to the vegetation composition arising from the drainage associated with the development.
- Please note that the EIAR bird survey recommendations above suggest that bird survey data should be presented in context and records should be supported by



basic environmental data such as hourly estimates of visibility, glare arcs, cloud cover and precipitation during Vantage Point (VP) and walk over survey periods.

- Specific consideration should be given to assessing risks, associated with the development, to breeding raptor species and migrating wildfowl.
- The cumulative impact of the development and other associated wind farm developments in the ZOI should be clearly assessed, particular emphasis should be given to the barrier effect and bird strike.
- Any mitigation by avoidance undertaken should be clearly documented and included in the EIAR and Natura Impact Report (NIR) where appropriate.
- Please note there can be no lacunae or unknowns in the NIS, because it is not appropriate for the details of proposed mitigation measures to be agreed post consent (see Circular PD 2/07 and NPWS 1/07). The detail of any proposed mitigation measure must be available as part of the assessment and prior to any decision in relation to the application.
- In relation to European sites particular emphasis is placed in the Department's observations on the adequacy of data, information and analyses available in the NIR, and on the implications of the proposed development for the conservation objectives and integrity of the European sites affected. This is because an appropriate assessment must contain complete, precise and definitive findings and conclusions with regard to the implications of a proposal for the conservation objectives and integrity of a European site(s).

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

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

The Manager, Development Applications Unit (DAU), Department of Culture, Heritage and the Gaeltacht, Newtown Road, Wexford, Y35 AP90

Is mise, le meas

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Sinéad O' Brien  
Development Applications Unit



Michelle Donnelly,  
SSE Renewables,  
D17 Omagh Enterprise Centre,  
Great Northern Road,  
Omagh,  
Co Tyrone,  
Northern Ireland,  
BT78 5LU

21 May, 2019.

**Re: Scoping for Drumnahough Wind Farm, townlands of Cark, Meenasaura and Carrickalangan**

**Your Ref:**

**Our Ref: 19/79**

Dear Michelle,

With reference to your letter received on 08 May, 2019, concerning the Scoping Report for the proposed Drumnahough Wind Farm, Geological Survey Ireland (a division of Department of Communications, Climate Action and Environment) would like to make the following comments.

Geological Survey Ireland provides information on all aspects of the geology of Ireland on our Map Viewer available on the GSI website [www.gsi.ie](http://www.gsi.ie). There are multiple layers of data available including Geology, Groundwater, Quaternary, Landslides, and Geological Heritage. Our newest map is the Physiographic Units map and this is especially designed to give information on land use. We would encourage the use of our [Map Viewer](#) when undergoing the planning process.

### **Geoheritage**

Geological Survey Ireland (GSI) is in partnership with the National Parks and Wildlife Service (NPWS, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs) to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Irish Geoheritage Programme (IGH) of GSI, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.

County Geological Sites (CGS), as adopted under the National Heritage Plan, include additional sites that may also be of national importance but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by GSI are categorised as CGS pending any further NHA designation by NPWS. CGS are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system.

County Geological Sites in audited and unaudited counties can now be viewed online under the Geological Heritage tab on the Geological Survey Public Data Online Viewer at: [Geological Survey's Online Viewer](#) or via a direct link at: [Geoheritage Online Viewer](#).

**There are two CGSs located just outside the boundary of the site.** The County Audit for North Donegal has been recently completed and will be published within a few months. Until then, all data provided should be considered preliminary.

- **Clogheracullion**, Co Donegal. (Central ITM: 194400, 407300). Registered under IGH 15 Economic Geology theme. "Main Radiometric Zone" in the Donegal granite. Uraninite in bog.
- **River Finn**, Co Donegal. (Central ITM: 201000, 400900). Registered under IGH 14 Fluvial and Lacustrine Geomorphology theme. Tributary to R. Foyle with palaeo-terraces, straths.



With the current plans, there is no envisaged impact on the integrity of County Geological Sites by the proposed developments. However, if the proposed development plan is altered, please contact Siobhán Power at [Siobhan.Power@gsi.ie](mailto:Siobhan.Power@gsi.ie) for further information and possible mitigation measures if applicable.

### **Groundwater**

It should be noted that our Map Viewer can be used to show Groundwater Vulnerability within a specific area. We recommend using this function when engaging in planning.

### **Landslides**

Our website has a layer in its Map Viewer which identifies past landslide events, extent of affected areas and assesses landslide susceptibility. The site is located in an upland area and there are recorded landslides in the area. We suggest using this layer when developing in upland or peatland areas.

### **Recommendations**

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. Should any significant bedrock cuttings be created, we would ask that they will be designed to remain visible as rock exposure rather than covered with soil and vegetated, in accordance with safety guidelines and engineering constraints. In areas where natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface and could be included as additional sites of the geoheritage dataset, if appropriate. Alternatively, we ask that a digital photographic record of significant new excavations could be provided. Potential visits from Geological Survey Ireland to personally document exposures could also be arranged.

The data would be added to GSI's 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.

### **Other Comments**

Geological Survey Ireland is the national earth science agency and has datasets on Bedrock Geology, Quaternary Geology, Geological Heritage Sites, Mineral deposits, Groundwater Resources and the Irish Seabed. These comprise maps, reports and extensive databases that include mineral occurrences, bedrock/mineral exploration groundwater/site investigation boreholes, karst features, wells and springs. Please see our [website](#) for data availability.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me, or one of my colleagues in the Geoheritage Programme (Sarah Gatley at [Sarah.Gatley@gsi.ie](mailto:Sarah.Gatley@gsi.ie) or Siobhán Power at [Siobhan.Power@gsi.ie](mailto:Siobhan.Power@gsi.ie)).

Le meas,

Dylan Potter  
**Contract Geologist**  
**Geoheritage Programme**  
**Geological Survey Ireland**



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**From:** Roger Woods [rwoods@bai.ie]  
**Sent:** 17 May 2019 11:24  
**To:** Donnelly, Michelle  
**Subject:** [EXTERNAL] RE: Drumnahough Windfarm Scoping

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Hi Michelle

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

Regards

Roger

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

Tel: 01 6441200  
Fax: 01 6441299

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---

**From:** Donnelly, Michelle <[michelle.donnelly@sse.com](mailto:michelle.donnelly@sse.com)>  
**Sent:** Monday 29 April 2019 15:44  
**To:** Roger Woods <[rwoods@bai.ie](mailto:rwoods@bai.ie)>  
**Subject:** Drumnahough Windfarm Scoping

Hi,

Please find attached scoping request for proposed Drumnahough Wind Farm

If you require any further information please contact me on any of the details below

Kind regards

**Michelle Donnelly**  
Consent Manager  
Consenting Team  
T: +44 (0)2882 253945 Internal: 3945  
M: +44 (0)7921 099 663  
E: [michelle.donnelly@sse.com](mailto:michelle.donnelly@sse.com)  
D17 Omagh Enterprise Centre, Great Northern Road, Omagh, BT78 5LU

---

**From:** EIAPlanning [eiaplanning@epa.ie]  
**Sent:** 30 April 2019 14:06  
**To:** Donnelly, Michelle  
**Subject:** [EXTERNAL] RE: Drumnahough Windfarm Scoping EPA002810

---

Dear Ms Donnelly,

Further to your email dated 29 April 2019, can you please confirm whether or not the proposed windfarm development will be located on a site/facility that is currently licenced by the Environmental Protection Agency? If so, you might please provide us with the Licence Reg. number and we will determine the relevant approach to dealing with this scoping request.

Please note that the Environmental Licensing Programme does not respond to EIA/planning related correspondence received relating to non-licensable developments. Therefore, it is not necessary for you to submit such documents for non-licensable activities to the Agency. Documents relating to non-licensable developments include but are not limited to:

- Wind farms
- Roads
- Electricity transmission lines
- Solar energy farms
- Flood relief schemes
- Hydrometric stations
- Housing developments
- General developments

Regards,

EIA Team

---

**From:** Donnelly, Michelle [<mailto:michelle.donnelly@sse.com>]  
**Sent:** 29 April 2019 16:03  
**To:** Wexford Receptionist <[REC\\_WEX@epa.ie](mailto:REC_WEX@epa.ie)>  
**Subject:** Drumnahough Windfarm Scoping

Hi,

Please find attached scoping request for proposed Drumnahough Wind Farm

If you require any further information please contact me on any of the details below

Kind regards

**Michelle Donnelly**  
Consent Manager  
Consenting Team  
T: +44 (0)2882 253945 Internal: 3945  
M: +44 (0)7921 099 663  
E: [michelle.donnelly@sse.com](mailto:michelle.donnelly@sse.com)

---

**From:** planning applications [planning.applications@failteireland.ie]  
**Sent:** 03 May 2019 12:54  
**To:** Donnelly, Michelle  
**Subject:** [EXTERNAL] RE: Drumnahough Windfarm Scoping  
**Attachments:** EIS & Tourism Guidelines.pdf

---

Hello Michelle,

Thank your email in relation to the consultation on the preparation of an Environmental Impact Assessment Report for Drumnahough Windfarm, Co Donegal.  
Please see attached a copy of Fáilte Ireland's Guidelines for the treatment of tourism in an EIS, which we recommend should be taken into account in preparing the EIAR.

Regards,

Yvonne

## Yvonne Jackson

Product Development Support-Environment & Planning Unit | Fáilte Ireland

Áras Fáilte, 88/95 Amiens Street, Dublin 1. D01WR86

T +353 (0)1 884 7224 | [www.failteireland.ie](http://www.failteireland.ie)



---

**From:** Donnelly, Michelle <michelle.donnelly@sse.com>  
**Sent:** 29 April 2019 4:11 PM  
**To:** Yvonne Jackson <Yvonne.Jackson@failteireland.ie>  
**Subject:** Drumnahough Windfarm Scoping

Hi,

Please find attached scoping request for proposed Drumnahough Wind Farm

If you require any further information please contact me on any of the details below

Kind regards

### Michelle Donnelly

Consent Manager

Consenting Team

T: +44 (0)2882 253945 Internal: 3945

M: +44 (0)7921 099 663

E: [michelle.donnelly@sse.com](mailto:michelle.donnelly@sse.com)

D17 Omagh Enterprise Centre, Great Northern Road, Omagh, BT78 5LU

[www.sse.com](http://www.sse.com)

---

**From:** O'BRIEN Christophe [Christophe.O'BRIEN@IAA.ie]  
**Sent:** 16 May 2019 14:24  
**To:** Donnelly, Michelle  
**Cc:** Planning  
**Subject:** [EXTERNAL] RE: EIAR Request: Drumnahough Wind Farm

---

Good afternoon Michelle,

Apologies for the delay in replying I was out of the office last week and am working through a number of emails as you can imagine.

Based on the information provided, the Authority would not have any particular requirements for incorporation into an EIAR.

It is likely that during the planning process, the Authority would furnish the following general observations:

“In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to: (1) agree an aeronautical obstacle warning light scheme for the wind farm development, (2) provide as-constructed coordinates in WGS84 format together with ground and tip height elevations at each wind turbine location and (3) notify the Authority of intention to commence crane operations with a minimum of 30 days prior notification of their erection.”

Do you require a formal headed letter in this regard or will this email suffice?

Best Regards,

Christophe

*Christophe O'Brien*  
Aerodromes Inspector  
Safety Regulation Division  
Irish Aviation Authority  
T: + 353 (1) 603 1492  
M: + 353 86 33 22022  
E: [christophe.o'brien@iaa.ie](mailto:christophe.o'brien@iaa.ie)



---

**From:** Donnelly, Michelle <michelle.donnelly@sse.com>  
**Sent:** Wednesday 8 May 2019 14:27  
**To:** O'BRIEN Christophe <Christophe.O'BRIEN@IAA.ie>  
**Cc:** Planning <planning@iaa.ie>  
**Subject:** RE: EIAR Request: Drumnahough Wind Farm

Hi Christophe,

Thanks for the response.

Please see attached the layout the a spreadsheet of the details required below.

The original planning ref was 08/50687.

If you need anything further please let me know

Kind regards

Michelle

---

**From:** O'BRIEN Christophe <Christophe.O'BRIEN@IAA.ie>  
**Sent:** 29 April 2019 12:26  
**To:** Donnelly, Michelle <[michelle.donnelly@sse.com](mailto:michelle.donnelly@sse.com)>  
**Cc:** Planning <[planning@iaa.ie](mailto:planning@iaa.ie)>  
**Subject:** [EXTERNAL] EIAR Request: Drumnahough Wind Farm

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---

Hi Michelle,

We have received your letter regarding the proposed planning application for a revised Wind Farm layout for Drumnahough Wind Farm, Co. Donegal.

In your letter you advised that an indicative turbine layout would be provided but we don't appear to have received that? If you could forward on the following information please:

- The number of turbines on the wind farm.
- WGS-84 co-ordinates of each turbine.
- Ground elevation of each turbine (Malin Head OD).
- Blade tip elevation of each turbine (Malin Head OD).
- Height of turbine (from ground elevation to blade tip).
- OS Contour maps of the site, both scale 1:50,000 and 1:12,500, showing the location of each turbine.

Also, can you please provide the former planning reference which I understand has now expired?

Once we have received this information, we will be in a position to furnish you with observations in this regard.

Best Regards,

Christophe

*Christophe O'Brien*  
Aerodromes Inspector  
Safety Regulation Division  
Irish Aviation Authority  
T: + 353 (1) 603 1492  
M: + 353 86 33 22022  
E: [christophe.o'brien@iaa.ie](mailto:christophe.o'brien@iaa.ie)



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# IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA HÉIREANN

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

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

21th May 2019

**Michelle Donnelly**  
**Consent Manager**  
**SSE Renewables (Ireland)**  
**Red Oak South**  
**South County Business Park**  
**Leopardstown**  
**Dublin 18**  
**michelle.donnelly@sse.com**

**RE: Scoping for Drumnahough Wind Farm, Townlands of Cark, Meenasaura and Carrickalangan- Co. Donegal**

Dear Ms Donnelly,

Thank you for consulting the Irish Peatland Conservation Council regarding the proposed wind farm.

## **Irish Peatland Conservation Council**

The Irish Peatland Conservation Council (IPCC) was established in 1982 and has 35 years of experience in peatland conservation. Our aim is to conserve a representative sample of intact peatlands. Only 18% of Ireland's original range of peatland habitats are deemed worthy of conservation. 82% have become degraded from multiple pressures such as peat extraction, agriculture, forestry and habitat fragmentation (Ireland's Peatland Conservation Action Plan 2020, Malone & O'Connell, 2009).

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. We would also draw your attention to this document to ensure its requirements are met within developments planned on or near peat soils. The National Peatlands Strategy can be downloaded from [www.npws.ie](http://www.npws.ie).

While we are not inherently opposed to the construction of wind farms as we understand that Ireland has legal obligations to provide 40% of its energy production from renewable sources by 2020 (under the 2009 Renewable Energy Directive), there is a responsibility on wind farm developers to ensure that there is no loss of important peatland habitat and the species that utilise it through the development of wind farms. Also, bad construction practices can result in an active carbon sink being converted to a carbon source which is detrimental to any effort in combating anthropogenically caused global climate change.

## **Legal Obligations to Protect Peatlands - County Donegal**

Ireland is legally bound by National and European legislation (The Wildlife Acts, Habitats and Bird's Directives) and international conventions (Ramsar, Bern Convention, Convention on Biological Diversity) to do our utmost to protect peatlands now and for future generations. In County Donegal specifically, only 19.6% of the original peatland habitat remains (Bogs & Fens of Ireland Conservation Plan 2005, Foss, O'Connell, Crushell, 2001). Peatland habitats have been severely diminished in the country and this destruction is an issue in other legislation and conventions such as the UN Convention on Climate Change, Bonn Convention, World Heritage Convention, Water Framework Directive, Environment Liability Directive, Planning and Development Acts, National Monuments Acts, Environmental Directive, EIA and SEA. All of these legislative instruments have been adopted by Ireland and the IPCC ask that you assess your development with regard to these legal obligations.

## **35 YEARS TAKING ACTION FOR BOGS AND WILDLIFE**

Charity No/Uimhir Carthanacht: CHY6829 Registered in Ireland No/Uimhir Cláraithe in Éirinn: 116156 Registered Office/Oifig Cláraithe: Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland  
Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/Rúnaí Comhlacht: Rachel Kavanagh  
Directors/Stiúrthóirí: Martin Kelly, Catherine O'Connell, Rachel Kavanagh, Jennifer Roche, Seán Ó Fearghail,  
Patrons/Pátrúnaí: Pauline Bewick, Don Conroy, HRH Princess Irene of the Netherlands,  
Eanna Ní Lamhna, Matthijs Schouten, His Excellency Mr Peter Kok Netherlands Ambassador to Ireland

## Designated Areas

There are a number of Designated Sites in the area that need due consideration in relation to wind farm developments.

**Meentygrannagh Bog SAC [0173]** - This site contains a number of ANNEX I habitats that also support a number important Irish species protected under the EU Habitats & Species Directive and also the Irish Wildlife Act 1976. Red Grouse, Irish Hare and the Common Frog are listed within the National Parks and Wildlife Service Site Synopsis as utilising this site. This site also contains a fen which was drained and then reinstated by the owner at the request of the NPWS. The NPWS also note that this nature reserve has a diversity of habitats indicative of interesting peatlands and is one of the last examples of highland saddle bog. The IPCC Peatland Sites Database lists afforestation, drainage, overgrazing and ESB powerlines/station as threats to this site.

**River Finn SAC [2301]** - This is a large site that contains a number of ANNEX I habitats such as North Atlantic Wet Heaths with *Erica tetralix* [4010], Blanket Bogs [7130] and Transition Mires and Quaking Bogs [7140]. This site also contains Lough Finn which is one of only two places where a special variation of Arctic Char resides. This aquatic habitat is very sensitive to changes within the larger catchment such as increased sedimentation and acidification from forestry or peat developments. River Finn is also well known for its salmon fisherie, . The IPCC Peatland Sites Database records afforestation by Coilte and private land owners as threats to this site.

**Derryveagh & Glendowan Mountains SPA [4039]** - The NPWS Site Synopsis describes this nature reserve as an extensive upland site where 5 species of high ornithological importance utilise regularly. This site also includes an internationally recognised wetland designated as a World Ramsar Site and Statutory Nature Reserve.

**Tullytresna Bog pNHA [1870]** - This Designated Nature Reserve is described by the NPWS as being a good example of an intact highland bog and also is home to the Red Grouse which is an ANNEX II & ANNEX III species, protected under the EU Habitats Directive. The Red Grouse is also Red-Listed as a Bird of Conservation Concern in Ireland. The IPCC Peatland Sites Database lists this site as being under threat from afforestation, wind farms, drainage, mechanical cutting and burning.

## BirdWatch Ireland Species Sensitivity Score to Wind Farms

Data provided by BirdWatch Ireland shows that the proposed footprint of the wind farm is situated within an area that may affect sensitive bird species such as Curlew and Red Grouse. (available from [maps.biodiversityireland.ie](http://maps.biodiversityireland.ie))

## Water Framework Directive

The Environmental Protection Agency monitor many rivers and lakes in Ireland to ensure that we comply with the Water Framework Directive, which states, that our aquatic habitats need to be of “Good Ecological Status”. The ecological condition of the freshwater rivers and lakes in the area of the proposed windfarm needs to be examined in relation to the proposed windfarm footprint prior to any construction and incorporated into any plans. The construction methods and operating phase of any development should be designed so as not to detrimentally affect the natural aquatic resources and improve it where possible. Some of the rivers which are local to proposed development are recorded as AMBER, YELLOW and GREEN Ecological Status. There is also a number of rivers (and Lough Deale) which have not been assessed as per the Water Framework Directive and these should be monitored for baseline data and also assessed to ensure that the development would not affect them throughout any developments lifetime.

## Wetland Surveys Ireland

There are a number of wetlands recorded by Wetland Surveys Ireland such as WM\_DG175, DG\_599 & DG\_187. These sites have been recorded within “Distribution, Ecology and Conservation of Blanket Bogs in Ireland” by John Conaghan of NPWS (2000). These sites need due consideration to ensure that they will not be affected by the development and also please liaise with Wetland Surveys Ireland in regards to this proposed development.

## Archaeology

Article 1 of The European Convention on the Protection of the Archaeological Heritage, ratified by Ireland in 1997 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. Please ensure that there are plans in place for possible archaeological discovery on site throughout the construction and operating phase.

## Curlew (*Numenius aquata*)

The Curlew is one of the most endangered species in Ireland and the breeding population has declined by 78% over the past 40 years with less than 130 breeding pairs left (Birdwatch Ireland I-WeBS Newsletter August 2017). The IPCC would like to remind you that this bird is listed as an ANNEX II section II bird species within the E.U Birds Directive [Council Directive 79/409/EEC] and also has a national status of Red on the Birds of Conservation Concern in Ireland list. The National Curlew Task Force & Curlew Conservation Programme (NPWS) is working to bring this species back from near extinction in Ireland and we would urge developers to liaise with them and BirdWatch Ireland in relation to any development. There are sightings of Curlew recorded in the Bird Atlas 2007-2011 available from the National Biodiversity Data Centre close to proposed footprint which needs to be examined to ensure the development will not detrimentally affect any possible Curlew utilising the area.



**In conclusion**

The IPCC request that maps should also be provided that also includes the current windfarms in the area as we have found it very difficult to assess how the proposed turbines will be situated on top of another wind farm (or incorporated within it).

The carbon footprint of the windfarm needs to be quantified accumulatively with the other developments in the area including the wind farms and forestry activities. We would also ask if there has been any research into the restoration of the peatlands once forestry has been removed. The number of wind farms in the locality has seriously fragmented protected habitat which is indicative of County Donegal's natural habitat. IPCC are unsure how the landscape is being managed at a County level in relation to wind-farms and this needs to be thrashed out within the EIAR as the level of habitat fragmentation is dis-heartening. There is a high number of designated sites and nature reserves in the area that are losing their natural wild integrity due to the imposing turbines destroying the views and supporting habitat. The IPCC do not think that proposing a turbine 170m from a designated nature reserve is best practice, especially as the height of the turbine will match the distance. The IPCC Sites Database has recorded the fact that there are many threats already altering the integrity of the nature reserves in the area and the IPCC could not support further degradation of Ireland's natural peatland habitats and the species that depend on them.

Yours Sincerely

A handwritten signature in black ink that reads "Tristram Whyte". The signature is written in a cursive style with a large, sweeping initial 'T'.

Tristram Whyte -- Freshwater Biology B.Sc(hons)  
Conservation Policy & Fundraising Officer

---

**From:** Thomas Barry [Tom.Barry@TETRAIRELAND.IE]  
**Sent:** 01 May 2019 06:57  
**To:** Donnelly, Michelle  
**Subject:** [EXTERNAL] FW: Drumnahough Windfarm Scoping

---

Michelle,

We anticipate no impact from development at the proposed location. Can you ensure the proposal is also reviewed by eir.

Regards,  
Tom

---

**From:** Derek Rosarius  
**Sent:** Tuesday 30 April 2019 09:28  
**To:** Thomas Barry  
**Subject:** FW: Drumnahough Windfarm Scoping

The below, and attached was sent to info

---

**From:** Donnelly, Michelle [<mailto:michelle.donnelly@sse.com>]  
**Sent:** Monday, April 29, 2019 4:36 PM  
**To:** Info  
**Subject:** Drumnahough Windfarm Scoping

Hi,

Please find attached scoping request for proposed Drumnahough Wind Farm

If you require any further information please contact me on any of the details below

Kind regards

**Michelle Donnelly**

Consent Manager

Consenting Team

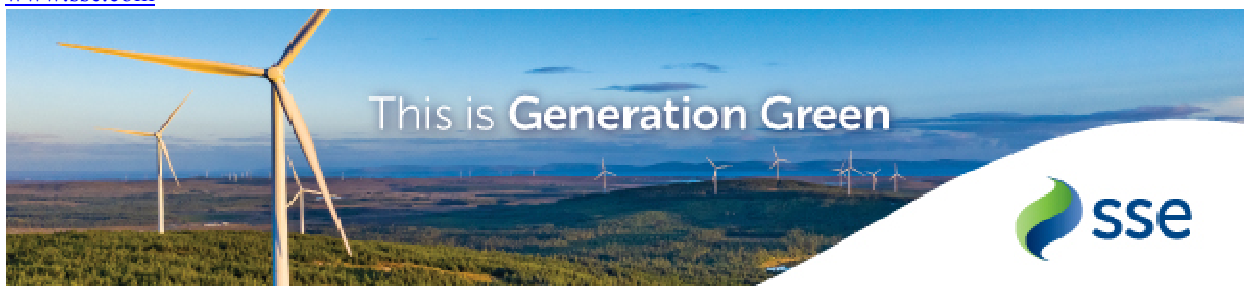
T: +44 (0)2882 253945 Internal: 3945

M: +44 (0)7921 099 663

E: [michelle.donnelly@sse.com](mailto:michelle.donnelly@sse.com)

D17 Omagh Enterprise Centre, Great Northern Road, Omagh, BT78 5LU

[www.sse.com](http://www.sse.com)



# **Appendix A-2(ii)**

## **Second Consultation Document and Consultee Responses**

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XXXXX

17<sup>th</sup> January 2020

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**Re: Consultation on Proposed Wind Farm Development at Drumnahough, Co. Donegal**

---

Dear Sir/Madam

Malachy Walsh and Partners (MWP) has been commissioned by *SSE Renewables Ireland* and *Coillte Cuideachta Ghníomhaíochta Ainmnithe* (Coillte) to undertake an Environmental Impact Assessment (EIA) and prepare a subsequent Environmental Impact Assessment Report (EIAR) relating to plans for the proposed development of a wind farm on lands at and near Drumnahough in Co. Donegal. Preliminary details of the proposed project are attached.

I am consulting with you on this proposal as it may be of interest or concern to you (or your organisation). While there will be the opportunity to make comments and/or a submission on the proposed development as part of the planning process, if there is any key issue which you consider should be addressed in the EIA/EIAR we would welcome your input at this early stage.

Should you require additional information or wish to further discuss the development proposal please contact me via email at [valerie.heffernan@mwp.ie](mailto:valerie.heffernan@mwp.ie) or by post at Malachy Walsh and Partners, Reen Point, Blennerville, Tralee, Co. Kerry.

Yours sincerely,

  
\_\_\_\_\_

**Valerie Heffernan**  
For and on behalf of Malachy Walsh and Partners



**DIRECTORS:** Peter O'Donnell BE, CEng, MICE FIEI | Jack O'Leary ME, CEng, FIEI, FConsEI | Peter Fay BScEng, DipEng, CEng, MIEI, MStructE  
Paul Collins BE, CEng, MIEI, MStructE | Declan Cremen BE, CEng, MIEI, MStructE | John Lee BE, CEng, MIEI, HDipSHWW  
Mohammed Rafiq BSc, AHU, CEng, MStructE (Director London)

**ASSOCIATE DIRECTORS:** Sean Doyle BE, CEng, MIEI | Brian Sayers BE, CEng, MSc, MIEI

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**Preliminary Project Details  
for  
Proposed Wind Farm Development  
at  
Drumnahough, Co. Donegal**

**Environmental Impact Assessment Consultation**

January 2020

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## 1 INTRODUCTION

A co-development between SSE Renewables and Coillte CGA are examining the feasibility of developing and operating a commercially viable windfarm project on lands at Drumnahough, Co. Donegal. Malachy Walsh and Partners has been commissioned by SSE Renewables Ireland to undertake an Environmental Impact Assessment (EIA) and prepare a planning application and Environmental Impact Assessment Report (EIAR) for the proposed development.

It is envisaged that the project will exceed a 50MW capacity scale and therefore will be a Strategic Infrastructure Development (SID) for which an application for planning permission must be made directly to An Bord Pleanála. It is anticipated that further consultation will be undertaken with Donegal County Council in conjunction with the SID pre-application phase process. Drumnahough Windfarm was previously consented in 2009 (DCC REF: 08/50687), but was not previously progressed due to unavailability of grid connection. The proposed application consists of a revised turbine envelope due to technology advances. A 167.5m turbine tip height is proposed as compared to the previously consented 135m tip height.

An environmental constraints study is underway and preliminary assessments have commenced to provide information on the environmental constraints, the receiving environment (baseline) and the potential sensitivities contained within the study area, so as to ensure a wind farm layout with least environmental impact is designed.

This document provides preliminary details on the proposed wind farm project and has been prepared for public consultation as part of the Environmental Impact Assessment (EIA) process.

## 2 PROJECT OVERVIEW

### 2.1 DEVELOPER / APPLICANT DETAILS

The developer and applicant for the project are SSE Renewables Ireland and Coillte CGA. SSE Renewables Ireland is Ireland's leading developer, owner and operator of onshore windfarms, with a vision to make renewable energy the foundation of a zero-carbon world. The renewable electricity generated at windfarms operated by SSE Renewable across Ireland powers SSE Airtricity, Ireland's largest provider of 100% green energy

Coillte have developed a number of Wind Energy Projects and are deeply committed to ensuring that their projects comply with statutory environmental requirements and to supporting, and developing relationships with the communities living near their projects and developments. Coillte is currently working toward adding a future 1GW of wind energy generation capacity over the next ten years, driving Ireland's ambition toward 70% renewable electricity by 2030.



## 2.2 LOCATION DETAILS

The area of the proposed Wind Farm being considered is located approximately 13km southwest of Letterkenny and 14km northwest of Stranorlar. Lough Deele lies approximately 1.3km to the northeast of the proposed development area (Figure 1). The proposed lands include lands under Coillte ownership along with additional private lands.

## 2.3 PROJECT COMPONENTS

It is anticipated that the project will include the following;

### Main project components:

- Wind Turbines, Foundations and Hardstand areas.
- On-site access roads.
- On-site interconnecting electrical cabling.
- Substation on the wind farm site.
- Meteorological Masts.
- Borrow Pits and spoil management areas.
- On-site tree felling.

### Off-site project components:

- Turbine component haulage route
- Replacement lands for felled forestry
- Grid connection; overhead line or underground cable, any requirements to upgrade substation offsite

## 2.4 PRELIMINARY LAYOUT

An indicative layout for a wind farm of up to 12 wind turbines is shown in Figure 2. This preliminary arrangement shows turbines located on elevated ground between 240 and 310 metres Ordnance Datum on the southern slopes of Cronaglack.

The rationale behind the current turbine locations are as a result of a preliminary environmental constraints study. Further layout iterations will emerge as the studies and the Environmental Impact Assessment progress with the likelihood that number and final positions of the wind turbines will be refined through the assessment process in order to avoid or reduce impacts. Adjustments to turbine locations may occur due to social, environmental or engineering issues.

## 2.5 SITE ACCESS

The site can be accessed from the southeast, from Local road LP1034. There is a good network of roads in existence within the site which will be utilised in the design of infrastructure.

An assessment of the delivery route is underway to determine the best route for delivery of the turbine components.

## **2.6 GRID CONNECTION**

The feasibility will be investigated for connecting to the National Grid via a proposed 110kV substation to be constructed on the north of the site under the 110kV line between Binbane and Letterkenny or connection into 110kV Lenalea substation located east of the site. Both an Overhead Line (OHL) and Underground Cable (UGC) are under consideration at this stage in the study.

## **3 VIEWS /COMMENTS/FEEDBACK**

It is recognised that consultation early and often is a critical component of the EIA process and we therefore value your input with regard to any issues or concerns that you may have in relation to wind energy development in this area. Comments to the proposed wind farm development are invited from all interested parties and can be forwarded to:

Valerie Heffernan  
Malachy Walsh and Partners,  
Reen Point,  
Blennerville,  
Tralee,  
Co Kerry

email: [Valerie.heffernan@mwp.ie](mailto:Valerie.heffernan@mwp.ie)



Figure 1 Study Area Location

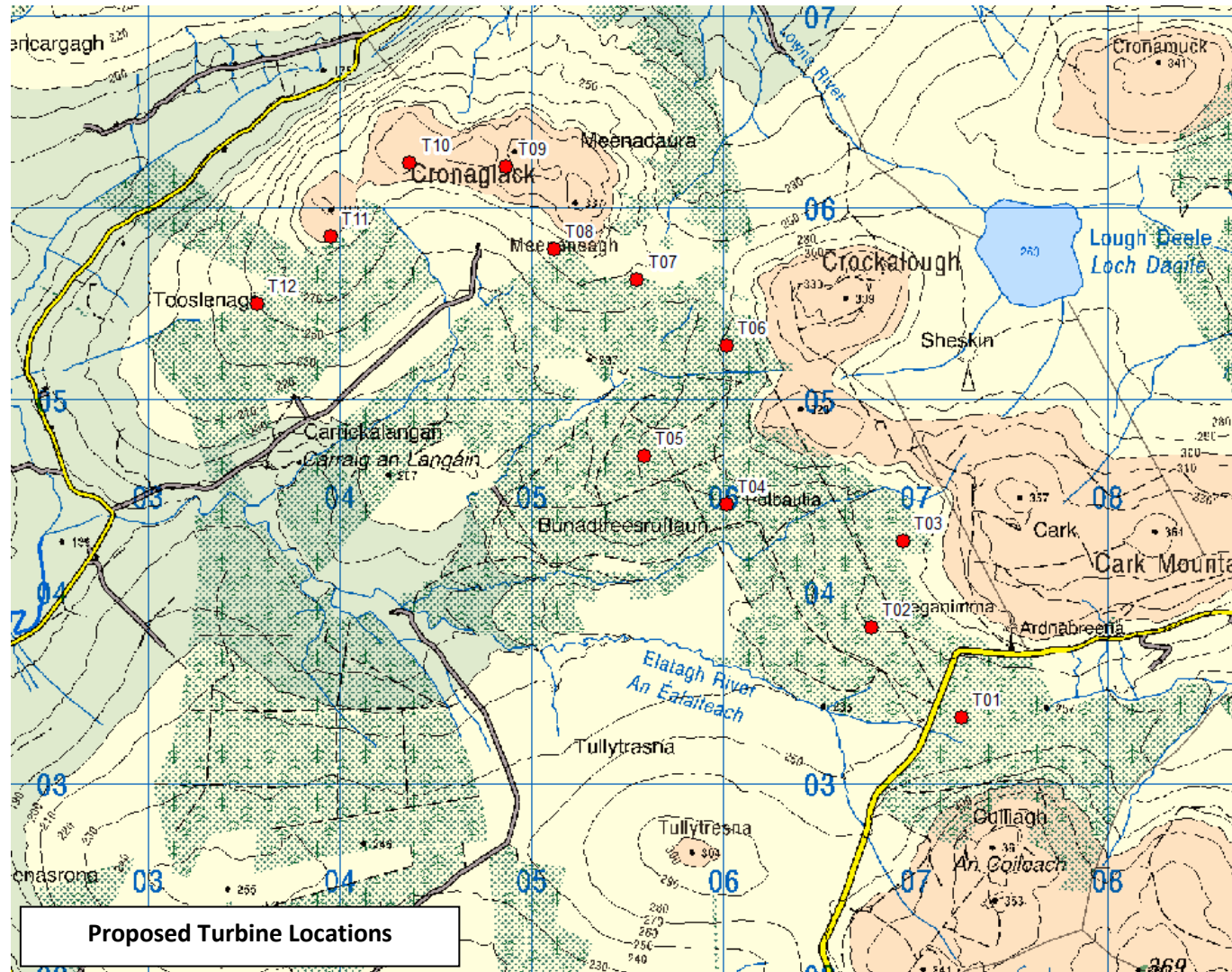


Figure 2 Preliminary Turbine Layout

## Valerie Heffernan

---

**From:** Roger Woods [rwoods@bai.ie]  
**Sent:** Tuesday 9 June 2020 14:42  
**To:** Valerie Heffernan  
**Subject:** RE: Consultation - Drumnahough Wind Farm

Hi Valerie

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

Regards

Roger

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

Tel: 01 6441200  
Fax: 01 6441299

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---

**From:** Reception BAI <[reception@bai.ie](mailto:reception@bai.ie)>  
**Sent:** Tuesday 9 June 2020 12:49  
**To:** Roger Woods <[rwoods@bai.ie](mailto:rwoods@bai.ie)>  
**Subject:** FW: Consultation - Drumnahough Wind Farm

---

**From:** Valerie Heffernan <[Valerie.Heffernan@mdp.ie](mailto:Valerie.Heffernan@mdp.ie)>  
**Sent:** 09 June 2020 12:38  
**To:** Reception BAI <[reception@bai.ie](mailto:reception@bai.ie)>  
**Subject:** Consultation - Drumnahough Wind Farm

Good afternoon,

Please find attached consultation for proposed Drumnahough Wind farm development.

Kind Regards,

**Valerie Heffernan,**  
for Malachy Walsh and Partners

---

**Malachy Walsh and Partners**

**Engineering and Environmental Consultants**

Reen Point, Blennerville,

Tralee, Co. Kerry.

V92 X2TK

Tel: 066 7123404

E: [valerie.heffernan@mwp.ie](mailto:valerie.heffernan@mwp.ie)

W: [www.mwp.ie](http://www.mwp.ie)



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Registered Office: Park House, Mahon Technology Park Bessboro Road, Blackrock, Cork, Ireland.

Registered in Ireland. No. 133445

## Valerie Heffernan

---

**From:** planning applications [planning.applications@faiteireland.ie]  
**Sent:** 23 January 2020 11:58  
**To:** Valerie Heffernan  
**Subject:** RE: Fáilte Ireland:: Consultation on proposed windfarm development at Drumnahough, Co. Donegal Email No :0100169009097 [Filed 23 Jan 2020 11:59]

Hello Valerie,

I received your e-mail through our Customer Support Team, thank you for the notification.

Please see attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIS, which we recommend should be taken into account in preparing the EIAR. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Just for your information, Fáilte Ireland has a dedicated 'inbox' for planning notifications/applications, information, queries, consultation and documentation. For any further correspondence please send direct to [planning.applications@faiteireland.ie](mailto:planning.applications@faiteireland.ie) (**preferred option**) or by post to Fáilte Ireland, Mr Shane Dineen, Manager of Environment & Planning, 88/95 Amiens Street, Dublin 1. D01WR86.

This will ensure the information/notifications will get to the Environment & Planning Unit Team and reviewed in a timely manner.

Regards & thanks,

Yvonne

## Yvonne Jackson

**Product Development Support-Environment & Planning Unit** | Fáilte Ireland  
Áras Fáilte, 88/95 Amiens Street, Dublin 1. D01WR86  
T +353 (0)1 884 7224 | [www.faitteireland.ie](http://www.faitteireland.ie)



----- Original Message -----

**From:** Valerie.Heffernan@mwp.ie  
**Received:** Thu Jan 16 2020 17:13:54 GMT+0000 (Greenwich Mean Time)  
**To:** Customer Support  
**Subject:** Consultation on proposed windfarm development at Drumnahough, Co. Donegal

Dear Sir/Madam

Malachy Walsh and Partners (MWP) has been commissioned by SSE Renewables Ireland and *Coillte Cuideachta Ghníomhaíochta Ainmnithe* (Coillte) to undertake an Environmental Impact Assessment (EIA) and prepare a subsequent Environmental Impact Assessment Report (EIAR) relating to plans for the proposed development of a wind farm on lands at and near Drumnahough in Co. Donegal. Preliminary details of the proposed project are attached.

Should you require additional information or wish to further discuss the development proposal please contact me via email at [valerie.heffernan@mwp.ie](mailto:valerie.heffernan@mwp.ie) or by post at Malachy Walsh and Partners, Reen Point, Blennerville, Tralee, Co. Kerry.

Regards,

Valerie Heffernan

**Valerie Heffernan, BSc, MSc**

For Malachy Walsh and Partners

---

**Malachy Walsh and Partners**

**Engineering and Environmental Consultants**

Reen Point, Blennerville,

Tralee, Co. Kerry.

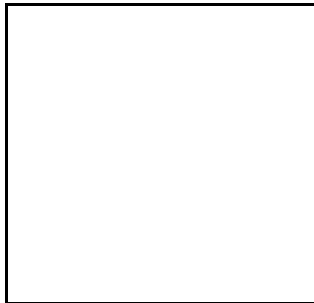
V92 X2TK

Tel: 066 7123404

E: [valerie.heffernan@mwp.ie](mailto:valerie.heffernan@mwp.ie)

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Malachy Walsh and Partners  
Reen Point  
Blennerville  
Tralee  
Co. Kerry

31 January 2020

**Re: Consultation on proposed windfarm development at Drumnahough Co. Donegal**

**Your Ref:**  
**Our Ref: 20/20**

Valerie Heffernan, A chara,

With reference to your letter received on 16 January 2020, concerning the proposed windfarm development at Drumnahough Co. Donegal, Geological Survey Ireland (a division of Department of Communications, Climate Action and Environment) would like to make the following comments:

Geological Survey Ireland is the national earth science agency and has datasets on Bedrock Geology, Quaternary Geology, Geological Heritage Sites, Mineral deposits, Groundwater Resources and the Irish Seabed. These comprise maps, reports and extensive databases that include mineral occurrences, bedrock/mineral exploration groundwater/site investigation boreholes, karst features, wells and springs. Please see our [website](#) for data availability and we recommend using these various data sets, when undergoing the EIAR, planning and scoping processes. Geological Survey Ireland should be referenced to as such and should any data or geological maps be used, they should be attributed correctly to Geological Survey Ireland. In particular we would like to draw your attention to the following data sets that you may not be aware of.

**Geoheritage**

Geological Survey Ireland (GSI) is in partnership with the National Parks and Wildlife Service (NPWS, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs) to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Irish Geoheritage Programme (IGH) of GSI, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.

County Geological Sites (CGS), as adopted under the National Heritage Plan are now included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#). The audit for Co. Donegal was carried out in 2019. The full report details will be published in early 2020 and will be available via the geoheritage page of Geological Survey Ireland website which can be found [here](#). As this has not yet been published I have checked our records which **show that there are no CGSs in the vicinity of the proposed development.**

Therefore, with the current plan, there are no envisaged impacts on the integrity of current CGSs by the proposed development. However, if the proposed development plan is altered, please contact Clare Glanville ([Clare.Glanville@gsi.ie](mailto:Clare.Glanville@gsi.ie)) for further information and possible mitigation measures if applicable.

**Groundwater**

Groundwater is important as a source of drinking water, and it supports river flows, lake levels and ecosystems. It contains natural substances dissolved from the soils and rocks that it flows through, and can also be contaminated by human actions on the land surface. As a clean, but vulnerable, resource, groundwater needs to be understood, managed and protected. Through our [Groundwater Programme](#), Geological Survey Ireland provides advice and maps to members of the public, consultancies and public bodies about groundwater quality, quantity and distribution. Geological Survey Ireland monitors groundwater nationwide by characterising aquifers,



investigating karst landscapes and landforms and by helping to protect public and group scheme water supplies. With regard to Flood Risk Management, there is a need to identify areas for integrated constructed wetlands. We recommend using the GSI's National Aquifer and Recharge maps on our [Map viewer](#) to this end.

### **Geohazards**

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides are the most prevalent of these hazards. Geological Survey Ireland has information available on past landslides for viewing as a layer on our [Map Viewer](#). Geological Survey Ireland also engages in national projects such as Landslide Susceptibility Mapping and GWflood Groundwater Flooding, and in international projects, such as the Tsunami Warning System, coordinated by the Intergovernmental Oceanographic Commission of UNESCO. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

### **Geothermal Energy**

Geothermal energy harnesses the heat beneath the surface of the Earth for heating applications and electricity generation, and has proven to be secure, environmentally sustainable and cost effective over long time periods. Geothermal applications can range in depth from a few metres below the surface to several kilometres. Ireland has widespread shallow geothermal resources for small and medium-scale heating applications, which can be explored online through Geological Survey Ireland's Geothermal Suitability maps for both domestic and commercial use. We recommend use of our [Geothermal Suitability maps](#) to determine the most suitable type of ground source heat collector for use with heat pump technologies. Ireland also has recognised potential for deep geothermal resources. Geological Survey Ireland currently supports and funds research into this national energy resource.

### **Natural Resources (Minerals/Aggregates)**

Geological Survey Ireland is of the view that the sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required. Geological Survey Ireland highlights the consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process. Aggregates are an essential natural resource for the construction industry and with the Government of Ireland "Building Ireland 2040" plan, understanding of aggregate source and supply will be important. Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#).

### **Other Comments**

We look forward to receiving a copy of the environmental impact assessment report in due course for statutory consultation, in the meantime if you have any questions in relation to our data sets please do not hesitate to contact us.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me ([Clare.Glanville@dcae.ie](mailto:Clare.Glanville@dcae.ie)).

Le meas,

Dr. Clare Glanville

**Senior Geologist, Geoheritage Programme**

## Valerie Heffernan

---

**From:** O'BRIEN Christophe [Christophe.O'BRIEN@IAA.ie]  
**Sent:** 20 January 2020 16:46  
**To:** Valerie Heffernan  
**Cc:** HUGHES John; RAFFERTY Audrey  
**Subject:** RE: Consultation on proposed windfarm development at Drumnahough, Co. Donegal [Filed 21 Jan 2020 09:06]  
**Attachments:** RE: EIAR Request: Drumnahough Wind Farm

Good afternoon Valerie,

Michelle Donnelly (SSE Renewables) was previously in touch with the Authority in relation to this project, the proposed Drumnahough WF in Co. Donegal, please see attached email.

Provided that no significant details related to the project, number of turbines, locations, blade tip height have been amended, then the Authority will likely have no specific requirements for integration into the EIA / EIAR process.

Please liaise with Michelle and advise if there are any significant amendments to the proposal. Otherwise, I trust that the previously supplied correspondence may suffice in this regard?

Best Regards,

Christophe

*Christophe O'Brien*  
Aerodromes Inspector  
Safety Regulation Division  
Irish Aviation Authority  
T: + 353 (1) 603 1492  
M: + 353 86 33 22022  
E: [christophe.o'brien@iaa.ie](mailto:christophe.o'brien@iaa.ie)



---

**From:** Valerie Heffernan <[Valerie.Heffernan@mwp.ie](mailto:Valerie.Heffernan@mwp.ie)>  
**Sent:** Thursday 16 January 2020 17:27  
**To:** RAFFERTY Audrey <[audrey.rafferty@iaa.ie](mailto:audrey.rafferty@iaa.ie)>  
**Subject:** Consultation on proposed windfarm development at Drumnahough, Co. Donegal

Dear Sir/Madam

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Should you require additional information or wish to further discuss the development proposal please contact me via email at [valerie.heffernan@mwp.ie](mailto:valerie.heffernan@mwp.ie) or by post at Malachy Walsh and Partners, Reen Point, Blennerville, Tralee, Co. Kerry.

Regards,

Valerie Heffernan

**Valerie Heffernan, BSc, MSc**

For Malachy Walsh and Partners

---

**Malachy Walsh and Partners**

**Engineering and Environmental Consultants**

Reen Point, Blennerville,

Tralee, Co. Kerry.

V92 X2TK

Tel: 066 7123404

E: [valerie.heffernan@mwp.ie](mailto:valerie.heffernan@mwp.ie)

W: [www.mwp.ie](http://www.mwp.ie)



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Registered in Ireland. No. 133445

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## Valerie Heffernan

---

**From:** O'BRIEN Christophe [Christophe.O'BRIEN@IAA.ie]  
**Sent:** 21 January 2020 11:55  
**To:** Valerie Heffernan  
**Cc:** HUGHES John; RAFFERTY Audrey  
**Subject:** RE: Consultation on proposed windfarm development at Drumnahough, Co. Donegal [Filed 27 Jan 2020 08:50]

Good afternoon Valerie,

Thank you for your email. The Authority can confirm that an increase in proposed blade tip height to 167.5m does not have any material impact and as such, the Authority has no specific requirements for integration into the EIA / EIAR process.

Best Regards,

Christophe

---

**From:** Valerie Heffernan <Valerie.Heffernan@mwp.ie>  
**Sent:** Tuesday 21 January 2020 10:13  
**To:** O'BRIEN Christophe <Christophe.O'BRIEN@IAA.ie>  
**Cc:** HUGHES John <John.HUGHES@IAA.ie>; RAFFERTY Audrey <audrey.rafferty@iaa.ie>  
**Subject:** RE: Consultation on proposed windfarm development at Drumnahough, Co. Donegal

Good morning Christopher,

I have contacted Michelle Donnelly and there has been a change to the application since the previous email.

Turbine locations have remained in the same location but turbine tip height has increased to 167.5m.

Let me know if you need any further information.

Regards,

Valerie.

---

**From:** O'BRIEN Christophe [mailto:Christophe.O'BRIEN@IAA.ie]  
**Sent:** 20 January 2020 16:46  
**To:** Valerie Heffernan  
**Cc:** HUGHES John; RAFFERTY Audrey  
**Subject:** RE: Consultation on proposed windfarm development at Drumnahough, Co. Donegal [Filed 21 Jan 2020 09:06]

Good afternoon Valerie,

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Please liaise with Michelle and advise if there are any significant amendments to the proposal. Otherwise, I trust that the previously supplied correspondence may suffice in this regard?

Best Regards,

Christophe

*Christophe O'Brien*

Aerodromes Inspector  
Safety Regulation Division  
Irish Aviation Authority  
T: + 353 (1) 603 1492  
M: + 353 86 33 22022  
E: [christophe.o'brien@iaa.ie](mailto:christophe.o'brien@iaa.ie)



---

**From:** Valerie Heffernan <[Valerie.Heffernan@mwp.ie](mailto:Valerie.Heffernan@mwp.ie)>

**Sent:** Thursday 16 January 2020 17:27

**To:** RAFFERTY Audrey <[audrey.rafferty@iaa.ie](mailto:audrey.rafferty@iaa.ie)>

**Subject:** Consultation on proposed windfarm development at Drumnahough, Co. Donegal

Dear Sir/Madam

Malachy Walsh and Partners (MWP) has been commissioned by SSE Renewables Ireland and *Coillte Cuideachta Ghníomhaíochta Ainmnithe* (Coillte) to undertake an Environmental Impact Assessment (EIA) and prepare a subsequent Environmental Impact Assessment Report (EIAR) relating to plans for the proposed development of a wind farm on lands at and near Drumnahough in Co. Donegal. Preliminary details of the proposed project are attached.

Should you require additional information or wish to further discuss the development proposal please contact me via email at [valerie.heffernan@mwp.ie](mailto:valerie.heffernan@mwp.ie) or by post at Malachy Walsh and Partners, Reen Point, Blennerville, Tralee, Co. Kerry.

Regards,

Valerie Heffernan

**Valerie Heffernan, BSc, MSc**

For Malachy Walsh and Partners

---

**Malachy Walsh and Partners**

**Engineering and Environmental Consultants**

Reen Point, Blennerville,

Tralee, Co. Kerry.

V92 X2TK

Tel: 066 7123404

E: [valerie.heffernan@mwp.ie](mailto:valerie.heffernan@mwp.ie)

W: [www.mwp.ie](http://www.mwp.ie)



Ms. Valerie Heffernan  
Malachy Walsh and Partners  
Reen Point  
Blennerville  
Tralee  
Co. Kerry

Malachy Walsh and Partners  
Date: 06/02/2020  
Action: V+H  
Project No: 19715  
PO No: N.A.

Dáta   Date	Ár dTag   Our Ref.	Bhur dTag   Your Ref.
5 February 2020	TII20-108637	19715

RE: EIAR Scoping Request: Proposed Windfarm (50MW capacity scale) at Drumnahough, Co. Donegal, with grid connection on behalf of SSE Renewables Ireland and Coillte Cuideachta Ghníomhaíochta Ainmnithe (Coillte).

Dear Ms. Heffernan,

Transport Infrastructure Ireland (TII) acknowledges receipt of your EIAR Scoping request in respect of the above proposed project, received by email on 16 January 2020.

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national road network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. 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 application referred.

The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidance as outlined in the Spatial Planning and National Roads Guidelines for Planning Authorities (2012). Regard should also be had to other relevant guidance available at [www.tii.ie](http://www.tii.ie). TII notes that the consultation documentation identifies a Wind Farm area stated to be located approximately 13km southwest of Letterkenny and 14km northwest of Stranorlar. With respect to EIAR Scoping issues, the recommendations indicated below provide only general guidance for the preparation of EIAR, which may affect the national road network. The developer should have regard, *inter alia*, to the following;

1. As outlined in the Spatial Planning and National Roads Guidelines, it is in the public interest that, in so far as is reasonably practicable, the national road network continues to serve its intended strategic purpose. The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network in order to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.
2. In relation to the proposed development site, 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. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.
3. In relation to grid connection and cable routing proposals should be developed to safeguard proposed road schemes as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

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).

In the context of existing national roads, alternatives to the provision of cabling along the national road network, such as alternative routing or the laying of cabling in private lands adjoining the national road, should be considered in the interests of safeguarding the investment in and the potential for future upgrade works to the national road network. The cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.

4. 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. Consultation with relevant PPP Companies and MMarC Contractors may also be required. All structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed.
5. 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.
6. TII Standards should be consulted to determine the requirement for Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA).
7. Assessments and design and construction and maintenance standards and guidance are available at [TII Publications](#) that replaced the NRA Design Manual for Roads and Bridges (DMRB) and the NRA Manual of Contract Documents for Road Works (MCDRW).
8. The developer, in conducting Environmental Impact Assessment, should have regard to TII Environment Guidelines that deal with assessment and mitigation measures for varied environmental factors and occurrences. In particular;
  - a. 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),
  - b. 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)).

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 practice.

I hope that the above comments are of use in your EIAR preparation.

Yours sincerely,

  
Michael McCormack  
Senior Land Use Planner