

# Drumlins Park Wind Farm Substation & Grid Connection

# Chapter 1: Introduction

## Drumlins Park Limited

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#### 1.1 Introduction

This Environmental Impact Assessment Report (EIAR) has been prepared by Galetech Energy Services Limited (GES) on behalf of Drumlins Park Limited ('the Applicant') to inform the Environmental Impact Assessment (EIA) to be carried out in respect of a Strategic Infrastructure Development (SID) planning application submitted direct to An Bord Pleanála pursuant to Section 182A (Electricity Transmission Lines) of the Planning & Development Act 2000 (as amended) ('the Act').

The proposed development is a 110 kilovolt (kV) 'loop-in/loop-out' electricity substation generally comprising 2 no. control buildings and substation compound enclosing 110kV electric plant together with approximately 700 metres (m) of underground 110kV electricity line and two single circuit end masts which will connect to the existing Lisdrum-Shankill 110kV overhead electricity transmission line. The proposed development is located in northwest County Monaghan approximately 4km southwest of the village of Newbliss, 8km southeast of Clones and 7km northwest of Cootehill. The proposed development will be located within the townlands of Drumanan and Cornawall, County Monaghan.

The proposed development will form part of an adjacent wind farm development, which has already been granted planning permission by Monaghan County Council by way of Section 34 of the Act (Planning Register Reference 19/486, the 'Drumlins Park Wind Farm'). The permitted Drumlins Park Wind Farm comprises 8 no. wind turbines each with a maximum tip height of up to 180m and all associated site development, reinstatement, temporary and ancillary works, including turbine foundations, crane hardstands, approximately 5.5 kilometres of site access tracks, permanent upgrade works to the L62012 and L62013 local roads, 11 no. site entrances, underground electricity and communications cabling, site drainage works, a temporary construction compound and a permanent meteorological mast with a maximum height of up to 101 metres. The permitted development is located within the townlands of Corlougharoe, Correvan, Drumlina, Tullyard, Drumacreeve, Drumanan, Cornawall, Drumgramph, Closdaw, Killyleg, Crossbane, Lislongfield, Rakean, Lismagonway, Aghadrumkeen and Newbliss, Drumcrow, County Monaghan.

The purpose of the proposed development<sup>1</sup> is to facilitate the export of renewable electricity generated by the Drumlins Park Wind Farm to the national electricity grid by way of the existing Lisdrum-Shankill 110kV overhead electricity transmission line.

The EIAR for the permitted Drumlins Park Wind Farm assessed 3 no. separate grid connection options, one of which comprised the provision of a 110kV 'loop-in/loop-out' substation at the proposed location. However, due to uncertainties regarding the exact method of connecting the wind farm to the national electricity grid, the planning application for the Drumlins Park Wind Farm was submitted to Monaghan County Council in accordance with Section 34 of the Act and no grid connection infrastructure was proposed as part of that planning application.

<sup>&</sup>lt;sup>1</sup> For the purposes of this EIAR, the terms 'proposed development', 'development', 'project', 'proposed development site', 'site', 'substation' and any variation thereof are used interchangeably throughout to describe 'the project' for the purposes of the EIA Directive and encompass and refer to the proposed substation and its associated ancillary infrastructure as described in **Chapter 3** of this EIAR.



#### 1.1.1 What is Environmental Impact Assessment (EIA)?

EIA is a process required by the European Union (EU) Environmental Impact Assessment Directive 2011/92/EU, as amended by 2014/52/EU, and transposed into Irish law by Part X of the Planning & Development Act 2000 (as amended).

EIA is carried out by the relevant competent authority, in this case An Bord Pleanála, to ensure that projects where the likelihood of significant effects on the environment cannot be excluded are subject to a comprehensive and independent examination, analysis and evaluation of their likely significant effects; including the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects; of both their construction and operational phases, prior to being granted planning permission.

EIA is fully integrated into the SID planning application process and helps to ensure that decisions to grant or refuse planning permission for proposed developments are made in the full knowledge of their likely significant effects on the environment, including through consultation with the public concerned.

#### 1.1.2 What is Environmental Impact Assessment Report (EIAR)?

An EIAR is a written statement prepared by the developer (in this case, the Applicant) of the likely significant effects, if any, which the proposed development, if carried out, will have on the environment. The EIAR consists of a systematic analysis of the proposed development, including its construction and operational phases, in relation to the existing environment. It is an iterative process carried out throughout the full lifecycle of the project design and consenting process so as to allow for preventative and ameliorative action, as necessary, at a point in time when changes can still be made to the project that anticipate, avoid and mitigate any likely significant effects foreseen.

The EIAR is the principal document that informs the EIA process and provides integral information which An Bord Pleanála can use; amongst other considerations, including, where appropriate, its own supplementary assessments; in independently undertaking EIA and informing its decision to grant (including subject to conditions and/or modifications) or to refuse planning permission, and/or to seek further information from the Applicant.

The EIAR can also be used by third parties, including members of the public concerned, as part of the public participation process, to evaluate the proposed development and its likely significant environmental effects, and to make submissions to the SID planning application process.

#### 1.2 SID Status

SID is development which is of strategic national or regional importance where a planning application must be made directly to An Bord Pleanála in the first instance, and not to the local Planning Authority as would be the normal course.

Electricity transmission infrastructure, as defined in Section 182A of the Act, may be SID. Therefore, prior to submitting a SID planning application, a proposed development must firstly be the subject of pre-application consultations with An Bord Pleanála pursuant to Section 182E to determine whether it constitutes SID, or not.

Following consultation with Eirgrid, as the national electricity grid Transmission System Operator, it was concluded that the provision of a 110kV 'loop-in/loop-out'



substation was the most suitable means of connecting the Drumlins Park Wind Farm to the national electricity grid. Accordingly, the Applicant entered into preapplication consultations (Reference ABP-306018-19). An Bord Pleanála subsequently determined that, in accordance with the report of its Inspector, the proposed substation constitutes strategic infrastructure, falls within the scope of Section 182A of the Act, and that an application for permission must be made directly to An Bord Pleanála by way of Section 182A of the Act. A copy of this determination is provided at **Annex 1.1** (**Volume II**).

#### 1.3 Screening

The first stage of the EIA process involves deciding whether an EIA needs to be undertaken or not. This ensures that EIA is only undertaken for projects where the likelihood of significant effects on the environment cannot be excluded.

#### 1.3.1 EIA Classes & Thresholds

Schedule 5 of the Planning & Development Regulations 2001 (as amended) specifies the classes of development which, where they comprise a certain class of development or exceed certain thresholds, must be subject to formal EIA. Where an EIA is mandatory, an EIAR is required to be submitted with a planning application.

The proposed development is not, of itself, a class of development listed within Schedule 5 as requiring EIA and, accordingly, there is no statutory requirement for the proposed development to be accompanied by an EIAR. The proposed development also does not qualify as a change or extension to a development already authorised (i.e. Drumlins Park Wind Farm) pursuant to Schedule 5, Part 2, Class 13 of the Regulations as it does not engage any of the thresholds relating to installations for the harnessing of wind power for energy production (wind farms) i.e. number of turbines or megawatt output.

The purpose of EIA categories and thresholds is to generally distinguish between those projects where significant effects on the environment are unlikely and those that may be likely to have significant effects. Given that the proposed development is not a category of development that is mandatorily required to be subject to EIA, it can be generally concluded, on this basis, that it would be unlikely to have any significant effects on the environment.

#### 1.3.2 Case-by-Case Screening

Notwithstanding the above, a screening assessment carried out pursuant to the Regulations may, having regard to the precautionary principle, determine on a case-by-case basis that EIA is required where the likelihood of significant effects on the environment cannot be excluded, including by reference to any likely significant in-combination effects with permitted and proposed projects and plans.

A 110kV substation and ancillary infrastructure, located on the site of the proposed development, was previously assessed in the EIAR for the permitted Drumlins Park Wind Farm (submitted in 2019). Accordingly, the proposed development forms part of an overall development that was formerly subject to EIA. It has also been determined that the proposed development will form a new 'node' on the national electricity transmission network, connecting the permitted Drumlins Park Wind Farm to the national electricity grid.

For these reasons, and in order to allow An Bord Pleanála to undertake a complete in-combination EIA of the proposed development, the Applicant has submitted an



EIAR with the planning application, which includes up-to-date relevant environmental information with due cognisance to the current policy context.

This EIAR therefore assesses the likelihood of significant effects on the environment of the proposed development in combination with, *inter alia*, the permitted Drumlins Park Wind Farm and the 110kV Lisdrum-Shankill overhead electricity transmission line. This approach further accords with a judgement of the High Court (O'Grianna & Ors. v. An Bord Pleanála [2014] IEHC 632) which determined that a wind farm development, to which the EIA Directive applies, and its connection to the national grid are considered a single indivisible project for the purpose of the EIA Directive and should be subject to a complete, cumulative EIA.

#### 1.4 Content

In order to be relevant, complete and legally compliant, the content of this EIAR includes all of the information required by EIA Directive 2011/92/EU, as amended by 2014/52/EU, and national legislation as appropriate and necessary to the specific characteristics of the proposed development, and includes:-

- (a) A description of the project comprising information on the site, design, size and other relevant features of the project;
- (b) A description of the likely significant effects of the project on the environment;
- (c) A description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- (d) A description of the reasonable alternatives studied by the developer (the Applicant), which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;
- (e) A non-technical summary of the information referred to in points (a) to (d); and,
- (f) Any additional information specified in Annex IV of the EIA Directive relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected.

#### 1.5 Format

The EIAR is presented as 3 no. volumes, which are interrelated and should be read in conjunction with each other, as follows:-

- Volume I comprises the main EIAR text and follows a 'grouped format' structure where each environmental factor is assessed and presented as a separate chapter. The EIA Directive prescribes the range of environmental factors which should be used to organise descriptions of the environment and likely significant environmental effects. These have been supplemented with additional environmental factors owing to the characteristics of the project under assessment, as follows:-
  - Chapter 1: Introduction;
  - Chapter 2: Assessment of Project Alternatives;
  - Chapter 3: Description of the Proposed Development;
  - Chapter 4: Population & Human Health;
  - Chapter 5: Biodiversity;
  - Chapter 6: Land & Soils;
  - Chapter 7: Water;



- Chapter 8: Air Quality & Climate;
- Chapter 9: Landscape;
- Chapter 10: Cultural Heritage;
- Chapter 11: Noise & Vibration;
- Chapter 12: Shadow Flicker;
- Chapter 13: Material Assets; and
- Chapter 14: Interactions of the Foregoing.
- Volume II comprises a range of annexes, including technical data and reports, which informed the impact assessment provided in Volume I so as to ensure the EIAR is transparently supported by verifiable evidence.
- Volume III comprises the EIAR prepared in respect of the permitted Drumlins Park Wind Farm. This EIAR has been provided to ensure that An Bord Pleanála has before it, and easily to hand for the purposes of cross-referencing, all necessary and relevant environmental assessments related to the entire project to allow for a complete and comprehensive cumulative assessment of the likely significant effects on the environment, including in-combination effects.

A **Non-Technical Summary** of the EIAR is also provided as a separate standalone volume in order to facilitate the wider public concerned in their involvement in the statutory consultation process during the EIA and planning application determination stage.

#### 1.6 Structure

In order to provide for a consistent approach and to communicate clear, concise, unambiguous information, each chapter of this EIAR is systematically organised so as to follow a similar basic structure, as follows:-

- The existing environment: A description of the context, character, significance and sensitivity of the receiving (baseline) environment using standard descriptive methods, in order to predict the likely significant effects of the proposed development;
- The likely significant impacts of the proposed development: The aspects of the construction, existence and operation of the proposed development that are likely to affect the existing environment including, as appropriate, predicted, potential, residual, 'do nothing' and 'worst case' effects. The likely significance of any effects is determined with reference to magnitude, intensity, integrity, duration and probability; and
- The measures to mitigate and monitor adverse effects: The range of methods which are proposed for mitigation by avoidance, reduction and remedy of any likely significant effects (including unplanned events) together with ongoing monitoring of the efficacy of mitigation measures.

This structure, which clearly separates data (descriptions of the receiving environment and of the project) from impact predictions (likely significant effects and mitigation measures), is designed to ensure that replicable impact assessments, based on rigorous scientific information and verifiable evidence, is carried out using recognised methods that are presented and documented in a fully legible, transparent and objective manner.

This methodological structure is designed to reduce any possible subjective information and bias in order to facilitate An Bord Pleanála in their independent EIA of the proposed development.



#### 1.7 Guidance

A range of general statutory and non-statutory guidance documents were consulted in undertaking and preparing this EIAR, including *inter alia*:-

- Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, 2017);
- Draft Advice Notes for preparing Environmental Impact Statements (Project Type 33) (EPA, 2015);
- Wind Energy Development Guidelines for Planning Authorities (DoEHLG, 2006);
- Review of the Wind Energy Development Guidelines Preferred Draft Approach (DHPLG, 2017);
- Draft Wind Energy Development Guidelines for Planning Authorities (DHPLG, 2019);
- Best Practise Guidelines for the Irish Wind Energy Industry (IWEA, 2012);
- Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2018);
- Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment (European Commission; 2013);
- Guidance Document on Wind Energy Developments and EU Nature Legislation (European Commission, 2020);
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (DHPLG, 2018);
- Guidelines for Environmental Impact Assessment of Electricity Transmission Projects (Eirgrid, various); and
- Electricity Transmission Studies Evidence-Based Environmental Studies (Eirgrid, various).

The above is a general and non-exhaustive list of EIAR related guidance. Additional guidance documents, specific to each environmental topic, are referenced in each chapter of this EIAR, as relevant.

#### 1.8 EIAR Project Team

The EIA Directive requires that an EIAR must be prepared by a team of competent, qualified experts with an appropriate combination of experience, expertise and knowledge related to the significance, complexity and range of effects that an EIAR needs to assess. Such competence includes an understanding of the legal context of the decision-making process and a variety of technical experts to address different environmental topics, and their interactions, in order to ensure that the information included in the EIAR is complete to a high level of objective quality.

#### 1.8.1 Project Management

GES has been appointed by the Applicant to manage and co-ordinate the preparation of this EIAR. GES is an Irish multi-disciplinary renewable energy consultancy that specialises in the project management of planning, environmental and technical engineering services of wind energy developments from project feasibility through to delivery and operation. GES combines the expertise of leading experts in wind farm design, planning and environmental assessment and has extensive experience in managing and coordinating EIAR projects for wind energy and associated electricity grid and substation developments. Some examples of wind energy and ancillary EIAR projects managed by GES are provided in **Table 1.1** below.



Development	Development Description	Status
Carrickallen Wind Farm, Co. Cavan	Wind Farm comprising 10 no. wind turbines and associated ancillary infrastructure.	Operational
Oldmill Wind Farm, Co. Monaghan	Wind Farm comprising 7 no. wind turbines and associated ancillary infrastructure.	Operational
Taghart Wind Farm, Co. Cavan	Wind Farm comprising 7 no. wind turbines and associated ancillary infrastructure.	Permitted
Taghart Wind Farm Grid Connection, Co. Cavan & Co. Meath	Approximately 12km of underground electricity line located predominately within the carriageway of the public road network.	Permitted
Cloghan Wind Farm, Co. Offaly	Wind Farm comprising 9 no. wind turbines and associated ancillary infrastructure.	Permitted
Cloghan Wind Farm Grid Connection, Co. Offaly	Approximately 8km of underground electricity line located predominately within the carriageway of the public road network.	Permitted
Pinewoods Wind Farm, Co. Laois	Wind Farm comprising 11 no. wind turbines and associated ancillary infrastructure.	Permitted
Pinewoods Wind Farm Substation & Grid Connection	110kV electricity substation and ancillary electrical infrastructure and all associated site development works.	Proposed
Drumlins Park Wind Farm, Co. Monaghan	Wind Farm comprising 8 no. wind turbines and associated ancillary infrastructure.	Permitted

#### Table 1.1: Examples of EIAR projects managed by GES

#### 1.8.2 Environmental Specialists

The EIAR is also critically dependent on the technical expertise, experience, independence and objectivity of environmental specialists. They characterise the existing environment and evaluate its sensitivity and likely significant effects.

An overview of the specialist experts involved in the preparation of each chapter of this EIAR, together with their relevant qualifications and key environmental factors covered, is provided in **Table 1.2** below. Some specialisms were provided in-house by GES expert staff while in other cases external specialists were appointed as expert consultants in order to undertake individual assessments and prepare specific chapters on environmental topics.

Each appointed specialist is a recognised expert in their field and was selected having regard to their knowledge of relevant environmental legislation; their experience and involvement in EIAR projects for wind energy developments; familiarity with pertinent standards and criteria for the evaluation and classification of significance of effects; the ability to interpret technical documents and to work with project designers to arrive at practical and reliable measures to avoid, mitigate and monitor likely significant effects; and to clearly and comprehensively present their findings in a concise and objective manner. A statement of competence for all of the specialist consultants who contributed to the preparation of this EIAR is provided in each individual chapter of this EIAR, as appropriate. As part of its project management role, GES undertook overall editorial management of the EIAR to ensure consistency and cross-referencing between different chapters and volumes, and identifying likely interactions between separate environmental factors, together with general project management, briefing and steering of specialist consultants throughout the iterative EIAR and design process.

Ch.	Environmental Topic	Specialist Consultant	Personnel
1	Introduction	GES	Gavin Daly
2	Assessment of Project Alternatives, including: • Alternative Grid Connections; and • Alternative Substation Technologies.	GES	BA Dip (ERM) MIPI Simon Carleton BA (Hons) MSc MIPI
3	Description of the Proposed Development, including: • Substation & Grid Connection; • Construction Materials & Aggregates; • Earthworks; and • Drainage & Surface Water Management	GES	Declan Owens BSc MSc MIPI Conor Foy BSc MSc AIEMA
4	<ul> <li>Population &amp; Human Health, including:</li> <li>Employment;</li> <li>Human Health (considered with reference to benchmark standards under other chapters such as noise, landscape, air quality etc.); and</li> <li>Amenity.</li> </ul>	GES	
5	Biodiversity, including: • Habitats • Birds • Bats • Non-volant mammals; and • Aquatic ecology.	Ecofact Environmental Consultants	Dr. William O'Connor Kevin P. Collins Amy Butler
6	Land & Soils, including: • Superficial Geology; • Bedrock Geology; • Geological Heritage & Designated Sites; and • Soil Contamination.	Hydro- Environmental Services	Michael Gill David Broderick
7	Water, including: • Local & Regional Hydrology; • Flood Risk; • Hydrogeology; • Ground/Surface physical characteristics; and • Drainage Management.	Hydro- Environmental Services	Michael Gill David Broderick
8	Air Quality & Climate, including: • Air Quality; • Climate; • Dust; • Greenhouse gas emissions; and • Contribution of proposed development to binding targets.	GES	Gavin Daly Simon Carleton Declan Owens Conor Foy
9	Landscape, including • Landscape Character; • Views & Prospects • Landscape Impact; and • Visual Impact.	Macro Works	Richard Barker Cian Doughan



10	<ul> <li>Cultural Heritage, including</li> <li>Known archaeological monuments;</li> <li>Areas of archaeological potential (including unknown archaeology);</li> <li>Architectural heritage; and</li> <li>Designations or sensitivities</li> </ul>	Dermot Nelis Archaeology	Dermot Nelis
11	Noise & Vibration, including	AWN Consulting	Mike Simms
	<ul> <li>Daytime Noise;</li> <li>Night time Noise;</li> <li>Vibration sources; and</li> <li>Sensitive receptors.</li> </ul>	GES	Cormac McPhillips
12	<ul> <li>Shadow Flicker, including</li> <li>Worst Case Effects;</li> <li>Expected Effects; and</li> <li>Mitigation Measures.</li> </ul>	GES	Cormac McPhillips Gavin Daly Simon Carleton Declan Owens Conor Foy
13	Material Assets, including • Transport & Access; • Aviation; • Telecommunications; and • Resources & Utility Infrastructure.	GES	Gavin Daly Simon Carleton Declan Owens Conor Foy
14	Interaction of the Foregoing	GES	Gavin Daly Simon Carleton Declan Owens Conor Foy
Non-	Technical Summary	GES	Gavin Daly Simon Carleton Declan Owens Conor Foy

Table 1.2: Specialist (	Consultants involved in the	preparation of this EIAR
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#### 1.9 Scoping

The scoping process involves identifying the environmental factors that are likely to be significant during EIA and eliminates those that are not. The scoping process is highly interrelated with the consultation process as described in **Section 1.10**. The prior determination of the nature and detail of the information to be contained in the EIAR is one of the most important stages of EIA and may be conducted through a formal or informal process. Scoping helps ensure that the EIAR remains focussed on factors that are environmentally based, likely to occur and may have likely significant and adverse effects.

In undertaking scoping, the statutory obligations as set out in Schedule 6 of the Planning & Development Regulations 2001 (as amended) ('the Regulations') and a range of guidance documents were consulted, including those referenced in **Section 1.7**. A desktop analysis was undertaken of relevant data sources and precedents of ElAs carried out for similar developments, together with other relevant policy documents, such as the Monaghan County Development Plan 2019–2025 and accompanying Strategic Environmental Assessment (SEA). The scoping process also considered relevant secondary and off-site developments not included within



the planning application, including the EIA carried out for the permitted Drumlins Park Wind Farm.

#### 1.9.1 Scoping Report

As part of the scoping process, the Applicant prepared an 'Outline Scoping Report' to provide a high level overview of the project context; description of the baseline environment; alternatives considered; the proposed development; its likely significant environmental effects; and mitigation and monitoring measures. This report was used in the course of the consultation process, as described in **Section 1.10** below, to allow consultees to inform themselves of the scope and likely significant environmental effects of the project, and to provide comments on the information which should be included in the EIAR, so that a focused and robust EIAR is produced.

#### 1.9.2 Formal Scoping

Section 182E(3) of Act provides for a discretionary provision whereby a prospective applicant during pre-application consultations with An Bord Pleanála may formally request an opinion on the scope and level of detail to be included in the EIAR. In this case, no formal scoping was considered necessary. In the course of pre-application consultations, An Bord Pleanála gave advice to the Applicant, through the published Inspector's Report, on the considerations related to the environment which may have a bearing on its decision in relation to any subsequent SID planning application.

#### 1.9.3 Informal Scoping

Informal scoping was carried out through ongoing iterative dialogue and feedback processes between the EIAR Project Team and the Applicant's project design team, and through the feedback received from the consultation process. Informal scoping was considered the most appropriate means of EIAR scoping in this case, as it was envisaged from the outset that no environmental factors would be scoped out or eliminated from the EIAR. Accordingly, no formal scoping was considered necessary and all environmental factors, as prescribed in the transposing legislation, have been fully addressed and included in this EIAR, as described in **Section 1.5** above.

As an active process, scoping continued throughout the preparation of the EIAR, including during the impact assessment stage, and the EIAR Project Team maintained a flexible view of the scope throughout by way of open, effective and ongoing communication, and consultation. The project design was dynamically informed and continually reviewed in light of environmental criteria and information emerging during the scoping process, and vice versa. This process resulted in the effective anticipation of any likely significant environmental effects and the consequent modification of the proposed development to avoid or reduce effects through redesign and identification of a number of Reasonable Alternatives as described in **Chapter 2**.

#### 1.10 Consultations

#### 1.10.1 Pre-Application Consultations

As discussed in **Section 1.2** above, the proposed development was the subject of mandatory pre-application consultation with An Bord Pleanála. As prescribed by legislation, the purpose of the pre-application consultations was twofold. Firstly, to



determine whether the proposed development constituted SID; and if so, secondly, to give advice to the Applicant on the procedures involved in making such an application and what considerations, related to proper planning and sustainable development or the environment, in the opinion of An Bord Pleanála, may have a bearing decision in relation to any subsequent SID planning application.

In issuing its determination that the proposed development constituted SID, An Bord Pleanála advised the Applicant in relation to the planning application procedures and also provided a list of prescribed bodies, which were considered relevant and to be consulted by the Applicant (see **Annex 1.1**, **Volume II**). Each of these prescribed bodies have also been notified by the Applicant in relation to the planning application for the proposed development.

#### 1.10.2 Planning Authority Consultations

As part of the pre-application consultation process, An Bord Pleanála identified Monaghan County Council, as the relevant planning authority for the proposed development site as a relevant prescribed body for the purposes of EIAR consultation.

A scoping request was issued to Monaghan County Council on 19 May 2020 and included the 'Outline Scoping Report' described in **Section 1.9.1** above, in order to provide the Planning Authority with sufficient information on the proposed development and its likely significant environmental effects. A letter of acknowledgement was received from the Planning Authority (see **Annex 1.2**, **Volume II**); however, no further comments have been received.

Separately, comments were also provided by the Environment Section (also enclosed at **Annex 1.2**) of Monaghan County Council recommending the preparation of a Spoil Management Plan and a 'Construction, Demolition and By-Products Management Plan' for the proposed development.

A consultation meeting with Monaghan County Council (Planning Authority) was held (via telephone) on 6 October 2020. During the meeting, the project was described in detail together with the relevant environmental factors; including, *inter alia*, population & human health (proximity to residential dwellings), land & soils, water, transport, landscape and visual amenity, and cultural heritage; to be addressed in the EIAR. A written record of the meeting was subsequently provided by the Planning Authority and a copy of same is enclosed at **Annex 1.3** (**Volume II**).

A scoping request was also issued to Cavan County Council on 19 May 2020 and, again, included the 'Outline Scoping Report' described in **Section 1.9.1**; however, a response has not been received.

#### 1.10.3 Stakeholder, Prescribed Body & Transboundary Consultations

A wide range of statutory and non-statutory organisations, including all bodies prescribed in the Planning & Development Regulations 2001 (as amended) and those listed in An Bord Pleanála's pre-application consultation determination, were contacted in writing at early stage in the scoping process to gather their views on the EIAR scope and the likely significant environmental effects of the proposed development. The consultation process involved furnishing each organisation with the 'Outline Scoping Report' described in **Section 1.9.1** above, accompanied by a set of maps and drawings, and requesting written feedback.



Annex 1.4 (Volume II) provides a sample copy of the consultation letter issued to each organisation, while a copy of all responses received is enclosed at Annex 1.5 (Volume II). Table 1.3, below, lists all organisations which have been consulted, details whether or not a response was received and provides a summary of the content contained therein. The specific prescribed bodies identified by An Bord Pleanála as relevant and to be consulted by the Applicant are also identified.

While the consultation undertaken to date has allowed for any identified concerns to be addressed within this EIAR; the statutory consultation process, to be commenced following submission of the SID planning application to An Bord Pleanála, will allow these organisations to make any further comments, as necessary.

#### 1.10.4 Transboundary Consultation

The EIA Directive requires that, where appropriate, consultations regarding the potential transboundary effects of a project shall be undertaken. Given the proposed development's proximity to the international boundary with Northern Ireland (United Kingdom) (c. 7km), a range of organisations in Northern Ireland have also been consulted with to further inform the scope of the EIAR. A copy of all responses received is enclosed at **Annex 1.6** (Volume II). Each organisation consulted with is also listed at **Table 1.3** below.

#### 1.10.5 Community Consultation & Participation

#### Non-Statutory Consultation

Community consultation and participation is a key element of each stage of the EIA process and there are specific statutory and non-statutory procedures for public consultation at various stages in the EIA process. While it is not obligatory during the pre-application scoping and preparation of an EIAR, the Applicant has undertaken extensive public consultation throughout the overall development design process. For the most part, this consultation was undertaken as part of the Drumlins Park Wind Farm EIAR process in 2019 which included the assessment of a 110kV substation on the proposed development site.

These consultations primarily comprised one-to-one discussions between the Applicant and homeowners and local residents. A number of public consultation days were also held which allowed members of the local population to discuss the project directly with the Applicant. A Community Consultation & Stakeholder Engagement Report which details the public consultation process undertaken is presented at **Annex 1.7 (Volume II)**. This approach is now recommended as standard per the draft Revised Wind Energy Development Guidelines for Planning Authorities 2019.

Concerns raised by local residents through the consultation process have all been taken account of in this EIAR as they relate to the proposed development.

#### Statutory Consultation

Once the SID planning application and EIAR is formally submitted for consideration; the Applicant, An Bord Pleanála and Monaghan County Council will make arrangements for public access and dissemination of the information contained in the EIAR in accordance with the procedures contained in the transposing legislation and as described in **Section 1.15** below.



Consultee	Requested in SID Determination	Response Received	Summary of Feedback
Airspeed Telecom	-	No	-
An Garda Síochána	-	No	-
An Taisce	Yes	No	-
Arden Broadband	-	No	-
Bat Conservation Ireland	-	No	-
Birdwatch Ireland	-	No	-
Bord Gáis Energy	-	No	-
Broadcasting Authority of Ireland	-	Yes	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 wind farms into existing FM networks. Also, the proposed wind farms are not located close to any existing or planned FM transmission sites.
BT Communications Ireland	-	Yes	The proposed development will have no impact on the BT Ireland microwave network.
Cavan County Council (Planning Department)	-	No	-
Commission for Communications Regulation	-	No	-
Commission for Regulation of Utilities	Yes	No	-
Department of Agriculture and the Marine (formerly Agriculture, Food and the Marine)	-	No	-
Department of Climate Action and Communications Networks (formerly Communications, Climate Action and Environment)	Yes	No	-
Department of Media, Tourism, Art, Culture, Sports	Yes	Yes	Acknowledgement of consultation request. No



Consultee	Requested in SID Determination	Response Received	Summary of Feedback
and the Gaeltacht (formerly Culture, Heritage and the Gaeltacht)			comments.
Department of Defence	-	No	-
Department of Housing, Local Government and Heritage (formerly Housing, Planning and Local Government)	-	Yes	Under Section 30 of the Planning and Development Act 2000, as amended, the Minister for Housing, Planning and Local Government is specifically precluded from exercising any power or control in relation to any particular case with which a planning authority or An Bord Pleanála is or may be concerned. As a result, we will not be offering any comments in this matter.
Department of Transport (formerly Transport, Tourism and Sport)	-	No	-
Eir Mobile	-	Yes	No transmission services will be affected by these works.
Eirgrid	-	No	-
Environmental Protection Agency	-	No	-
ESB Networks	-	No	-
Fáilte Ireland	Yes	Yes	Requested to have regard to Fáilte Ireland's Guidelines for the Treatment of Tourism addressed in the EIAR.
Gas Networks Ireland	-	Yes	Gas Networks Ireland has no recorded gas network within your area of interest.
Geological Survey of Ireland	-	Yes	No specific comments. Recommend that geo- hazards and groundwater features be considered in the EIAR.
Health and Safety Authority	-	No	-



Consultee	Requested in SID Determination	Response Received	Summary of Feedback
Health Service Executive – Environmental Health Department	Yes	No	-
larnród Éireann	-	No	-
Imagine Group	-	No	-
Inland Fisheries Ireland	-	Yes	General response providing comment on possible effects on important fisheries waters, important downstream habitats, design of crossing structures, appropriate timing of works, siltation and silt control and the appropriate management of concrete, oils and fuels.
Irish Aviation Authority	-	Yes	No views in relation to the development of the substation or requirements for inclusion in terms of the scoping exercise. Other comments made in relation to the permitted Drumlins Park Wind Farm.
Irish Peatland Conservation Council	-	No	-
Irish Raptor Study Group	-	No	-
Irish Water	-	No	-
Irish Wildlife Trust	-	No	-
Monaghan County Council	Yes	Yes	Recommendation that a Spoil Management Plan and Construction, Demolition and By-Products Management Plan be prepared for the development.
Mosaic Net	-	No	-
National Ambulance Service	-	No	-
National Federation of Group Water Schemes	-	No	-



Consultee	Requested in SID Determination	Response Received	Summary of Feedback
National Parks & Wildlife Service	-	No	-
National Trails Office	-	No	-
Netshare Ireland	-	No	-
Northern & Western Regional Assembly	-	No	-
Office of Public Works	-	No	-
Open Eir	-	No	-
Ripplecom	-	No	-
2rn (RTE Transmission Network Ltd)	_	Yes	The proposed substation poses no risk to our fixed linking and a low risk to DTT services. There is already a Protocol signed for the wind farm, we would consider the substation, in this case, to be part of the wind farm.
Sustainable Energy Authority of Ireland	-	No	-
Tetra Ireland Communications Ltd	-	No	-
The Arts Council	Yes	No	-
The Heritage Council	Yes	No	-
Three (3) Ireland	-	Yes	No concerns regarding the development.
Towercom	-	No	-
Transport Infrastructure Ireland	Yes	Yes	General response related to the safeguarding of road schemes, identification of haul routes, Traffic and Transport Assessment to be carried out (if required) and Road Safety Audit (if required).
Údarás na Gaeltachta	-	No	-
Virgin Media Ireland	-	Yes	Development will have no impact on the Virgin



Consultee	Requested in SID Determination	Response Received	Summary of Feedback
			Media Wireless Network.
Vodafone Ireland Ltd	-	Yes	Vodafone do not have any microwave links in the area
Waterways Ireland	-	No	-
Transboundary Consultation			
Department for Communities – Historic Environment Division	-	No	-
Department of Agriculture, Environment and Rural Affairs – Planning Response Team	-	No	-
Department for Infrastructure - Planning	-	Yes	The Department does not engage in pre-application scoping requests on transboundary proposals. If you haven't already done so, I would suggest that you contact the appropriate local planning authority in Northern Ireland.
Department for Infrastructure - Roads	-	No	-
Fermanagh & Omagh District Council – Environmental Health	-	Yes	Given the separation distances to receptors in Co. Fermanagh Northern Ireland, the Environmental Health Service (EHS) of Fermanagh and Omagh District Council consider that it is unlikely that there would be significant environmental impacts from the proposed substation in terms of noise or air quality
Fermanagh & Omagh District Council – Planning	-	Yes	Matters raised include landscape & visual amenity, cultural heritage, amenity at sensitive receptors, biodiversity and telecommunications.
Forest Service	-	Yes	The proposed development does not appear to affect forests within Northern Ireland and therefore Northern Ireland Forest Service has no comments to



Consultee	Requested in SID Determination	Response Received	Summary of Feedback
			make on this occasion.
Loughs Agency NI	-	Yes	The proposed development outside the Loughs Agency jurisdiction and as such it should be referred to Inland Fisheries Ireland
Northern Ireland Water	-	Yes	General response regarding the protection of drinking water
Office of Communications – Fixed Links	-	Yes	No comments.
Rivers Agency	-	No	-
RSPB Northern Ireland	-	No	-
Tourism NI	_	No	-

Table 1.3: Summary of Written Consultations



#### 1.11 Cumulative Impact

This EIAR has considered the likelihood of the proposed development, in its totality including secondary and off-site developments, acting in combination with other existing, permitted and proposed projects and plans in the wider vicinity of the proposed development site, to result in likely effects on the environment which, when combined, may result in effects which are cumulatively significant.

In the first instance, a desktop review of available data sources was undertaken to identify existing developments in the local area. Secondly, the EIA Portal<sup>2</sup> was consulted to assess for the presence of proximate developments which have been subject to EIA. Finally, the online ePlan portals of both Monaghan County Council<sup>3</sup> and Cavan County Council<sup>4</sup>, and the Northern Ireland Planning Portal<sup>5</sup> were examined to assess for extant planning permissions which had not yet been commenced. Developments warranting a cumulative impact assessment range from one-off rural dwellings to intensive agricultural developments (e.g. poultry units) and wind energy developments. **Table 1.4**, below, provides a non-exhaustive list of this EIAR.

Development	Planning Register Reference	Integrated Pollution Control (IPC) or Industrial Emissions Directive (IED) License	Development Description
One-off Rural Dwellings	Various	N/A	Assorted developments including detached dwellings, bungalows and extensions.
Agricultural Developments	Various	N/A	Assorted developments including livestock housing buildings, silage pits and dairy facilities.
Free-Range Poultry Unit	06/299	N/A	Erect a free-range hen house, feed storage silo, wash-down water storage tank, ancillary fencing and modify existing entrance to the public road.
Poultry Manure Storage Shed	07/474	N/A	Construct 1 no. poultry manure storage shed with wash-down water storage tank and make new entrance to the public road and all associated site works.
Free-Range Poultry Unit	08/318	N/A	Construct 1no. Free Range Hen House, Feed Storage Silo, Wash- Down Waters Storage Tank, Use previously approved entrance (Ref. No. 07/474) and ancillary

<sup>&</sup>lt;sup>2</sup> <u>http://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1</u>

<sup>&</sup>lt;sup>3</sup> <u>http://www.eplanning.ie/MonaghanCC/searchtypes</u>

<sup>&</sup>lt;sup>4</sup> <u>http://www.eplanning.ie/CavanCC/searchtypes</u>

<sup>&</sup>lt;sup>5</sup> http://epicpublic.planningni.gov.uk/publicaccess/



			site works.	
Poultry Rearing Units	18/160	P1079-01	Permission to demolish existing derelict dwelling and farm yard structures and to construct 6 no. poultry houses together with all ancillary structures.	
Poultry Rearing Units	19/61	N/A	Permission to construct a new free range poultry unit, new litter store, roads underpass, hardened area, vertical meal bins, underground washings, tanks and all ancillary site works.	
Poultry Rearing Unit	12/126; 18/57; and 18/358	P1086-01	Construction and operation of 3 no. poultry houses and ancillary structures.	
Poultry Rearing Unit	19/279	N/A	Permission to construct 2 new poultry units together with underground washings tanks, vertical meal bins, construction of a new agricultural entrance and all ancillary site works.	
Poultry Rearing Unit	17/622 19/440 20/153	N/A	Free-range poultry unit, and ancillary developments	
Poultry Rearing Unit	20/73	N/A	1 no. poultry house together with all ancillary structures.	
Poultry Rearing Unit	20/171	N/A	1 no. poultry house together with all ancillary structures.	
Poultry Rearing Unit	20/172	N/A	1 no. poultry house together with all ancillary structures.	
Poultry Rearing Unit	20/215	N/A	3 no. poultry house together with all ancillary structures.	
Anglo Beef Processors (ABP), Clones	Various	P0190-01; P0190-02; and P0190-03	Developments associated with the ABP meat processing plant.	
Scotshouse Quarries	Various	N/A	Quarrying Activities including crushing plants, site offices and wastewater treatment units.	
Drumlins Park Wind Farm	19/486	N/A	Construction and operation of an 8 no. turbine wind farm.	
Mullananalt Wind Farm	03/454 and 06/1688,	N/A	Construction and operation of a 5 no. turbine wind farm.	
Carrickallen Wind Farm (Cavan)	Various	N/A	Construction and operation of a 10 no. turbine wind farm.	
Mountain Lodge	01/1331	N/A	Construction and operation of a	



Wind Farm (Cavan)			22 no. turbine wind farm.
Bindoo Wind Farm (Cavan)	00/1497, 01/1576, 05/2021,	N/A	Construction and operation of a 32 no. turbine wind farm.
Edrans Wind Farm (Cavan)	99/253, 99/1309, 00/73 & 00/74	N/A	Construction and operation of a 2 no. turbine wind farm.

#### Table 1.4: Developments addressed in cumulative impact assessment

#### 1.12 Impact Assessment

This EIAR focuses on describing environmental effects that are both likely and significant by reference to the individual environmental factors described in **Section 1.5** and their sensitivities. In order to provide for clarity of method, language and meaning, and to accurately explain the full range of effects, the impact classification and sensitivity terminology described in the Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, 2017) is used in this EIAR to ensure that all likely significant effects are adequately considered and clearly and transparently communicated.

Within this EIAR, a distinction is drawn between 'impacts' and 'effects'. In accordance with the Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2018), an 'impact' is an action resulting in changes to the environment (for example, the construction activities of a development removing a hedgerow). An 'effect' is the outcome on the environment from an 'impact' (for example, the effects on a dormouse population from loss of a hedgerow). The effect arising from an impact may, or may not be, likely significant<sup>6</sup>.

Significance is a concept related to the weight that should be attached to effects when decisions are made. A significant effect is an effect that is sufficiently important to require assessment and reporting so that the competent authority (An Bord Pleanála) is adequately informed of the environmental consequences of permitting a project.

Further specific guidance, legislation and technical standards for describing environmental effects, and pertinent to particular environmental topics, are also described in each individual chapter of this EIAR, as necessary.

Magnitude	Sensitivity of Receptor					
	Very High	High	Medium	Low	Negligible	
Very High	Profound	Profound- substantial	Substantial	Moderate	Slight	
High	Profound- substantial	Substantial	Substantial - moderate	Moderate- slight	Slight- imperceptible	

<sup>&</sup>lt;sup>6</sup> As the purpose of this EIAR is to provide a report of the effects, if any, which proposed development would have on the environment, the term 'effects' is used generally throughout this EIAR.



Drumlins Park Wind Farm Substation & Grid Connection

Medium	Substantial	Substantial - moderate	Moderate	Slight	Imperceptible
Low	Moderate	Moderate- slight	Slight	Slight- imperceptible	Imperceptible
Negligible	Slight	Slight- imperceptible	Imperceptible	Imperceptible	Imperceptible

#### Table 1.5: Impact Significance Matrix

Source: Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, 2017)

- \* Categories with dark grey shading are considered to equate with 'significant' effects
- \*\* The significance matrix provides an indicative framework from which the significance of impact is derived.

#### 1.13 Mitigation & Monitoring Measures

Each chapter of the EIAR includes a description of the measures proposed to avoid, prevent, reduce or offset, as appropriate, any likely significant effects on the environment together with any proposed monitoring measures in respect of both construction and operational phases. Many mitigation measures have already been incorporated into the project design at an early stage, through the iterative scoping and impact assessment processes, to avoid any likely significant environmental effects. Monitoring measures have also been proposed, where appropriate, to demonstrate compliance with, and efficacy of, the mitigation measures proposed.

In order to ensure clarity of the mitigation and monitoring measures proposed, and as requested by An Bord Pleanála during pre-application consultations, all such measures are included in a compendium as a separate annex to this EIAR (see **Annex 1.8**, **Volume II**).

#### 1.14 Non-Technical Summary

A short, accessible non-technical summary has also been prepared as a separate and self-contained document which can be distributed to the public concerned and who may be likely to be affected by the proposed development.

The non-technical summary is laid out in a similar, but condensed, format to the main EIAR, i.e. describing the project, existing environment, effects and mitigation and monitoring measures, but presented in a manner that avoids technical language, such that it is easily understandable and accessible to a layperson.

The purpose of the non-technical summary is to transparently facilitate the full public access and participation of the public concerned in the statutory consultation process following the submission of the SID planning application to An Bord Pleanála.

#### 1.15 Public Access & Participation

Public access and participation is a core feature of the EIA process. Compliance with the Aarhus Convention and the EIA Directive requires that arrangements for public access facilitate the convenient dissemination of the information contained



in the EIAR in a timely and fully transparent manner. The core objective is to ensure that the public is made as fully aware as possible, and at the earliest possible stage, of the likely significant environmental effects of the proposed development prior to a decision being made by An Bord Pleanála.

Prior to the submission of the SID planning application, public newspaper notices will be published and site notices erected in accordance with the legislative requirements and any further directions provided by An Bord Pleanála. Full information will also be made available on how the public concerned can access the SID planning application documentation and this EIAR, and involve themselves in the decision-making process, including through making written submissions.

An Bord Pleanála and the Planning Authority (Monaghan County Council) will also make arrangements for public access and dissemination of this EIAR and other SID planning application documentation in accordance with the procedures contained in the legislation. This will include making all documents available to view and purchase at the offices of An Bord Pleanála (64 Marlborough Street, Dublin 1, D01 V902) and the Planning Authority (1 Dublin Street, Monaghan, Co. Monaghan, H18 X982). URL hyperlinks to all documents will also be available on the website of An Bord Pleanála.

A centralised EIA Portal<sup>7</sup>, managed by the Department of Housing, Local Government and Heritage, is a publicly accessible map-based database that provides users with access to all applications for development consent which have been accompanied by an EIAR since 16 May 2017. Following the submission of the planning application to An Bord Pleanála, the public concerned will also be able to access this EIAR via the EIA portal website. The EIAR shall be submitted in a format searchable by electronic means, in so far as practicable.

Finally, the Applicant is also required to provide a dedicated standalone website containing all of the SID planning application documentation and this EIAR. The address of this website (www.drumlinsparkwindfarmsubstationsid.ie) will be included in the public notices described above.

#### 1.16 Habitats Directive Appropriate Assessment

#### 1.16.1 Appropriate Assessment Screening (Stage 1)

As a separate but interrelated process, screening for the likelihood of any significant effects on European nature conservation sites (Natura 2000) designated under the EU Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC) was also undertaken through the preparation of what is known as an Appropriate Assessment (AA) Screening Report (Stage 1). This is formally a separate assessment process, with discrete reporting requirements, but is obviously highly interrelated with EIA.

The AA Screening Report assesses whether the preparation and submission of a Natura Impact Statement (NIS) to inform an AA (Stage 2), also to be undertaken by An Bord Pleanála as the competent authority, is required.

The AA Screening Report prepared on behalf of the Applicant concludes that it could not be confirmed that, in the absence of avoidance or reduction (mitigation/protective) measures, designated conservation sites would not be adversely affected by the indirect effects of the proposed development, either

<sup>&</sup>lt;sup>7</sup> EIA Portal



individually or in combination with other plans and projects, having regard to their conservation objectives.

As a result, and in accordance with the precautionary principle, it was concluded that the proposed development should proceed to be subject to a Stage 2 AA and that a NIS should be prepared and submitted with the planning application alongside this EIAR.

#### 1.16.2 Natura Impact Statement (Stage 2)

The NIS is presented and submitted as a separate standalone document and accompanies the SID planning application. The NIS includes both the Stage 1 Screening Report and the Stage 2 assessment.

The Biodiversity chapter of this EIAR (**Chapter 5**) does not repeat the detailed assessment included in the NIS but cross refers to the findings of this separate assessment, as necessary. This is as per EPA draft Guidance (2017) which states "a biodiversity section of an EIAR, should not repeat the detailed assessment of potential effects on European sites contained in a Natura Impact Statement" but should "incorporate their key findings as available and appropriate".

#### 1.17 Limitations and Difficulties Encountered in Compiling the EIAR

No general difficulties or limitations, including technical deficiencies or lack of knowledge, were encountered in compiling the information required to be provided in this EIAR. Where specific difficulties or limitations were encountered in relation to specific environmental factors, they are reported in the individual chapters of this EIAR, as appropriate.

#### 1.18 Note on Quotations

It is important to acknowledge that statutory EIAR requirements call for a comprehensive description of the existing environment as well as all likely significant effects. The EIAR therefore contains statements describing the positive and negative aspects of the proposed development. Selective quotation, out of context, may not be representative of the overall findings of the EIAR and, therefore, any quotations should be provided in their proper context.

#### 1.19 Relationship to the Planning Application

For the avoidance of doubt, not all elements of the entire development assessed in this EIAR are the subject of the SID planning application; and this EIAR should be read in conjunction with the plans and particulars of the applicable planning application.

