

# Construction and Environmental Management Plan

Proposed Sheskin South Wind Farm





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# 1. INTRODUCTION

This Construction and Environmental Management Plan (CEMP) has been developed by MKO on behalf of Sheskin South Renewables Power Designated Activity Company (DAC) who intend to apply to An Bord Pleanála for planning permission for the construction of a wind energy development, comprising up to 21 no. wind turbines and associated infrastructure in the townland of Sheskin near the village of Bangor Erris, Co. Mayo.

The CEMP has been prepared in conjunction with the Environmental Impact Assessment Report (EIAR) and the Natura Impact Statement (NIS) which will accompany the planning application for the Proposed Development to be submitted to An Bord Pleanála. Should the project secure planning permission, the CEMP will be updated, in line with all conditions and obligations which apply to any grant of permission. The CEMP should be read in conjunction with the EIAR and planning drawings. This CEMP is a key contract document which the Contractor will be legally required to implement. The CEMP due to its structure and nature will also require constant updating and revision throughout the construction period where required under any planning condition. Therefore, this is a working document and will be developed further prior to and during the construction phase of the Proposed Development.

Triggers for amendments to the CEMP will include:

- > When there is a perceived need to improve performance in an area of environmental impact;
- As a result of changes in environmental legislation applicable and relevant to the project;
- Where the outcomes from auditing establish a need for change;
- > Where Work Method Statements identify changes to a construction methodology to address high environmental risk; and
- > As a result of an incident or complaint occurring that necessitates an amendment.
- Any amendments will be in full compliance with the planning consent and mitigation measures as presented in the EIAR, NIS and all other relevant planning documents.

This report provides the environmental management framework to be adhered to during the precommencement, construction and operational phases of the Proposed Development and it incorporates the mitigating principles to ensure that the work is carried out in a way that minimises the potential for any environmental impacts to occur.

This report is intended as a single, amalgamated document that can be used during the future phases of the project, as a single consolidated point of reference relating to all construction, environmental and drainage requirements for the Planning Authority, developer and contractors alike.

## 1.1 Scope of the Construction and Environmental Plan

This report is presented as a guidance document for the construction of the proposed Sheskin South Wind Farm. Where the term 'site' is used in the CEMP it refers to all works associated with the Proposed Development. The CEMP outlines clearly the mitigation measures and monitoring proposals that will be adhered to in order to complete the works in an appropriate manner.

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

> Section 1 provides a brief introduction as to the scope of the report.



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



## 2. SITE AND PROJECT DESCRIPTION

## 2.1 Site Location

The Proposed Development is located within existing commercial forestry properties in the townland of Sheskin, approximately 6 kilometres (km) east of the village of Bangor Erris, Co. Mayo. The site location context is shown in Figure 2-2a and Figure 2-2b.

Access to the site, for Heavy Goods Vehicles (HGV) and abnormal loads (e.g. turbine components) will be via an existing forestry access road at the southeastern corner of the site, off a local road (L52926) which in turn is accessed from the N59 National Secondary route. The two other existing access junctions, also located on the eastern side of the site will be utilised to provide access for general site traffic such as construction staff and Light Goods Vehicles (LGV).

It is intended to connect the development to the national electricity grid via a 110kV underground cable which will connect the Sheskin South wind farm substation to the existing Bellacorick 110kV substation, located 5km southeast of the intended on-site 110kV substation, in the townland of Bellacorick. The grid connection cabling route will measure approximately 6.9km in length. Neither the on-site substation nor the grid connection cabling route form part of the planning application, however, they are assessed in this EIAR.

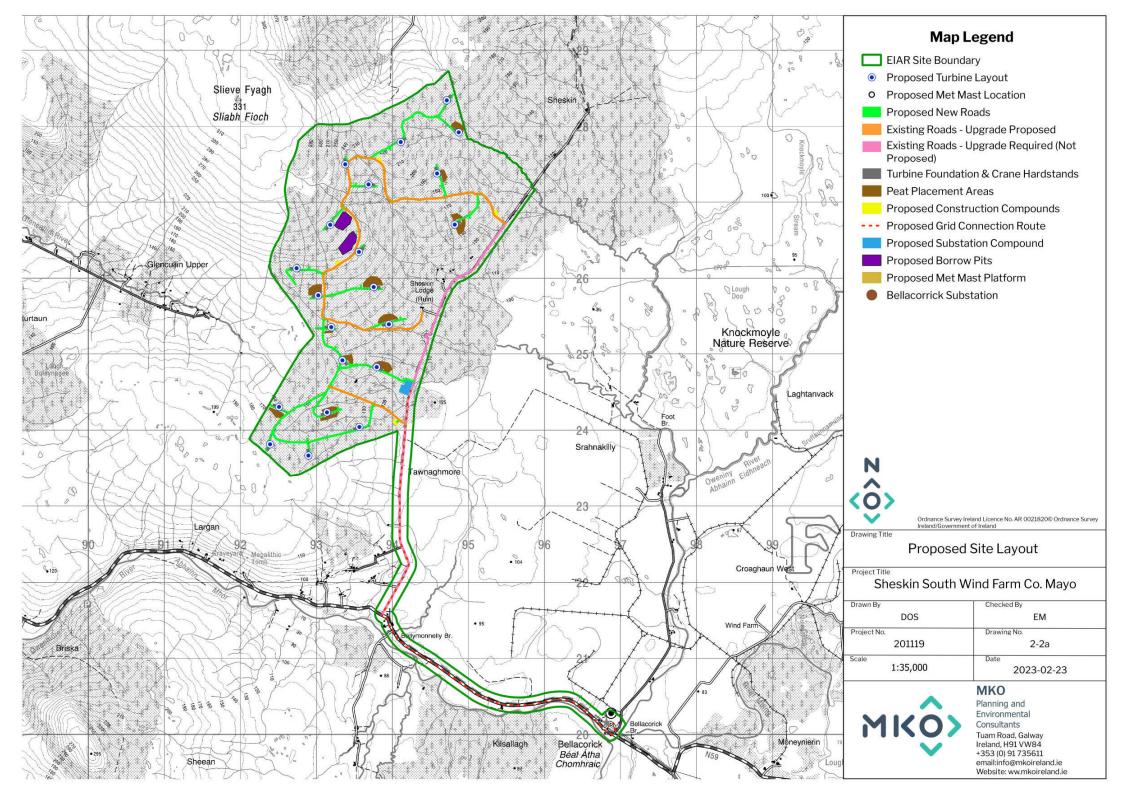
Works required along the intended turbine delivery route, between Galway Port and the proposed main site entrance do not form part of the planning application, however, they have been assessed as part of this EIAR.

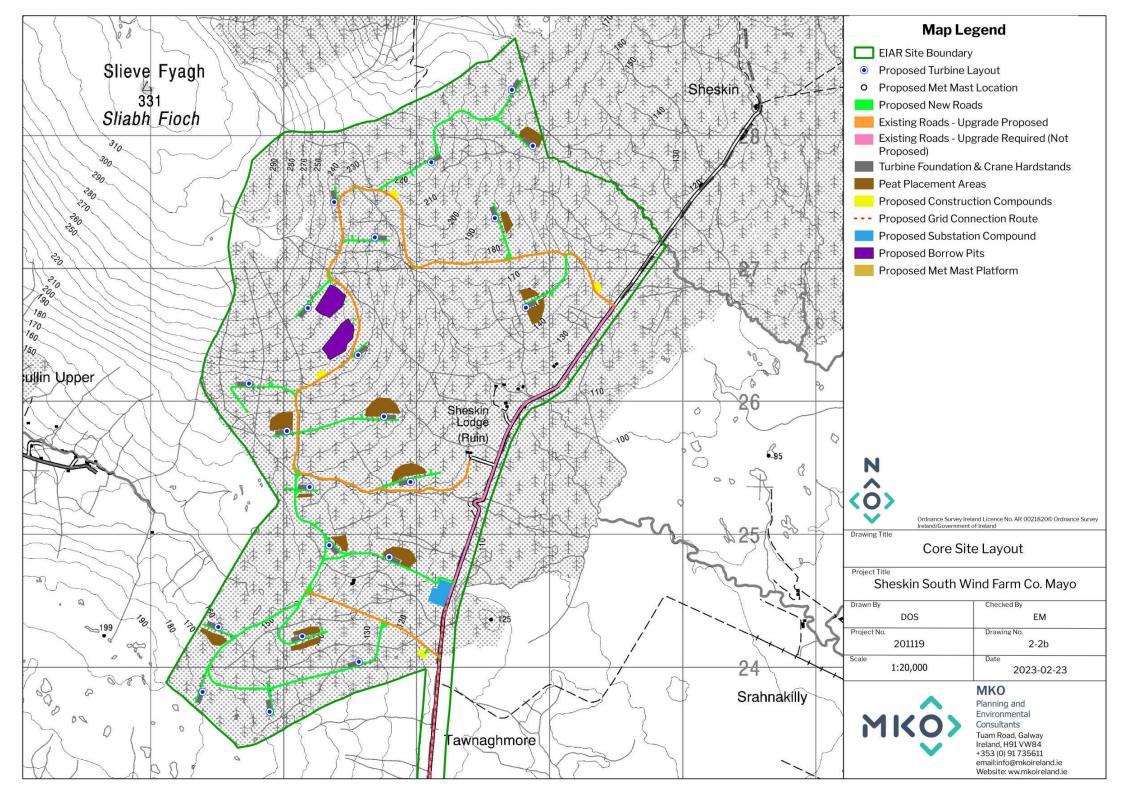
A full and detailed description of the Proposed Development (Sheskin South Wind Farm) for the purposes of the planning application and the additional elements that form part of the overall project, assessed in this EIAR, is contained in Chapter 4 of this EIAR. For the purposes of this EIAR, the wind farm, substation, grid connection and turbine delivery route accommodation works are collectively referred to as the "Proposed Development". The substation and grid connection are included in the Proposed Development for the purposes of the assessment in the EIAR, however it is not included in the planning application.

The townlands within which the project (i.e. the main proposed wind farm site, the on-site substation the grid connection cabling route and turbine delivery route accommodation works) is located are listed in Table 1-1. All townlands are located in Co. Mayo.

Townlands within which the project is located:			
Proposed Wind Farm Development			
Sheskin	-		
Intended Wind Farm Substation Location and Grid Connection Cabling Route			
Sheskin	Tawnaghmore		
Kilsallagh	Bellacorrick		
Turbine Delivery Route Accommodation Works			
Tawghnamore	Ballyglass East		

Table 2-1 Townlands within which the project is located







## 2.2 **Description of the Development**

The proposed wind farm development comprises the construction of 21 No. wind turbines and all associated works. The proposed turbines will have a blade tip height of 200 metres above the top of the foundation. The applicant is seeking a ten-year planning permission. The full description of the proposed wind farm development, as per the public planning notices, is as follows:

- *i.* Construction of 21 no. wind turbines and associated hardstand areas with the following parameters:
- *ii.* A total tip height of 200 metres,
- *iii.* Hub height of 115 metres, and
- *iv.* Rotor diameter of 170 metres
- v. All associated underground electrical and communications cabling;
- vi. 1 no. Meteorological Mast of 115 metres in height, and associated hardstanding area;
- vii. Upgrade of existing tracks and roads, provision of new permanent site access roads, upgrade of 2 no. existing site entrances, construction of 1 no. new site entrance;
- *viii.* 2 no. borrow pits;
- *ix.* 12 no. permanent peat placement areas;
- x. 4 no. temporary construction compounds with temporary site offices and staff facilities;
- *xi.* Permanent recreation and amenity works, including marked trails, seating areas, viewing point, amenity car park, and associated amenity signage;
- xii. Site Drainage;
- xiii. Site Signage;
- *xiv.* Ancillary Forestry Felling to facilitate construction and operation of the proposed development;
- *xv.* All works associated with the habitat enhancement and biodiversity management within the wind farm site; and
- xvi. All associated site development works and ancillary infrastructure.

This application is seeking a ten-year permission and 35 year operational life from the date of commissioning of the renewable energy development.

As stated in Section 2.1 above, it is intended to connect the development to the national electricity grid via a 110kV underground cable which will connect the Sheskin South wind farm substation to the existing Bellacorick 110kV substation, located 5km southeast of the intended on-site 110kV substation, in the townland of Bellacorick. The grid connection cabling route will measure approximately 6.9km in length. Neither the on-site substation nor the grid connection cabling route form part of the planning application, however, they are assessed in this EIAR.

The layout of the Proposed Development is shown on Figure 2-2a and 2-2b.





## 2.3 **Targets and Objectives**

The construction phase works are designed to approved standards, which include specified materials, standards, specifications and codes of practice. The design of the project has considered environmental issues and this is enhanced by the works proposals.

The key site targets are as follows;

- Ensure construction works and activities are completed in accordance with mitigation and best practice approach presented in the EIAR, NIS and associated planning documentation;
- > Ensure construction works and activities are completed in accordance with all planning documents for the development;
- > Ensure construction works and activities have minimal impact/disturbance to local landowners and the local community;
- > Ensure construction works and activities have minimal impact on the natural environment;
- > Adopt a sustainable approach to construction; and,
- > Provide adequate environmental training and awareness for all project personnel.

The key site objectives are as follows;

- Using recycled materials if possible, e.g. excavated stone, overburden and peat material;
- > Ensure sustainable sources for materials supply where possible;
- Avoidance of any pollution incident or near miss as a result of working around or close to existing watercourses and having emergency measures in place;
- > Avoidance of vandalism;
- > Keeping all watercourses free from obstruction and debris;
- Correct implementation of the sustainable drainage system (SuDS) drainage design principles;
- Keep impact of construction to a minimum on the local environment, watercourses, and wildlife;
- Correct fuel storage and refuelling procedures to be followed;
- Solution Good waste management and house-keeping to be implemented;
- > Air and noise pollution prevention to be implemented;
- Monitoring of the works and any adverse effects that it may have on the environment. Construction Methods and designs will be altered where it is found there is an adverse effect on the environment;
- Comply with all relevant water quality legislation listed throughout this document; and,
- > Ensure a properly designed, constructed and maintained drainage system appropriate to the requirements of the site is kept in place at all times.

## 2.4 **Construction Methodology Overview**

#### 2.4.1 Introduction

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



## 2.4.2 **Overview of Proposed Construction Methodology**

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

- > Temporary Construction Compounds;
- > Borrow Pits;
- > Peat Placement Areas
- > Tree Felling;
- > Site Drainage System;
- Site Access Roads;
- > Turbine and Meteorological Mast Foundations;
- Crane Hardstands;
- > Onsite Electricity Substation, Control Buildings and Battery Storage;
- Site Underground Cabling
- Scrid Connection Construction Methodology
- > Existing Underground Services
- > Joint Bays
- Grid Connection Watercourse/Culvert Crossings
- > Watercourse/Service Crossings
- > Transport Route Accommodation Works
- > Decommissioning

## 2.4.3 **Temporary Construction Compounds**

There are four temporary construction compounds proposed for the site. The location of the compounds are shown in Figure 2-2b. The compounds will be constructed as follows:

- The area to be used as the compound will be marked out at the corners using ranging rods or timber posts. Drainage runs and associated settlement ponds (refer to Section 3.2.2 below) will be installed around the perimeter;
- > The compound will be established using a similar technique as the construction of the excavated site roads as discussed above;
- Where required, a layer of geogrid will be installed and compacted layers of well graded granular material will be spread and lightly compacted to provide a hard area for site offices and storage containers;
- > Areas within the compound will be constructed as site roads and used as vehicle hardstandings during deliveries and for parking;
- > A bunded containment area will be provided within the compound for the storage of lubricants, oils and site generators etc.;
- If necessary, the compound will be fenced and secured with locked gates, although fencing would only be utilised where significant risk of danger to third parties or vandalism is envisaged; and,
- > Upon completion of the project the compound will be decommissioned by backfilling the area with the material arising during excavation, landscaping with peat material as required.
- > During the construction phase, a self-contained port-a-loo with an integrated waste holding tank will be used on site for toilet facilities. This will be maintained by the service contractor as required and will be removed from the site on completion of the construction phase.
- The water supply to the compounds will be from a temporary water storage tank which will be filled using a mobile water tank which will source water locally as required.



### 2.4.4 Borrow Pits

It is proposed to develop two on-site borrow pits. The first borrow pit is to be located within 35m of an existing forest road and within 35m of a proposed new road leading to Turbine No. 7. The second borrow pit is to be located approximately 100m south of Borrow Pit No. 1 and is within 30m of an existing forest road and 60m of a proposed new road leading to Turbine No. 9, as shown in Figure 2-2b. The borrow pits will be excavated and backfilled, as outlined in the Peat and Spoil Management Plan compiled by Fehily Timoney (Appendix 4-2 of the EIAR), as follows:

- > The rock within the proposed borrow pit footprints will be removed by either breaking or blasting depending on its excavability, which will be determined from confirmatory ground investigation carried out at the proposed borrow pits. The ground investigation shall comprise rotary core drilling with associated engineering logging including rock quality designation and strength and durability testing.
- It is proposed to construct the borrow pits so that the base of the borrow pits are below the level of the adjacent section of access road. As excavation progresses into the back edge of the borrow pits, localised deepening of the borrow pit floors may be required depending on extraction operations.
- It may be possible to excavate the rock from the borrow pits whilst leaving in place upstands/segments of intact rock which will help to retain the placed peat and spoil. The upstands/segments of intact rock will essentially act as engineered rock buttresses within the pits, forming a series of cells (4 no.). The cells will be opened in sequence and filled as needed.
- Slopes within the excavated rock formed the perimeter of the borrow pits will be formed at stable inclinations to suit local in-situ rock conditions. Exposed sections of the rock slopes will be left with irregular faces and declivities to promote revegetation and provide a naturalistic appearance.
- > The stability of the rock faces within the borrow pits will be inspected by the project Geotechnical Engineer upon excavation to ensure stability during construction works and in the long term. This inspection will allow unfavourable rock conditions to be identified and suitable mitigation measures to be applied such as removal of loose rock, in line with best practice guidelines.
- Where it is not possible to leave upstands/segments of intact rock in place it will be necessary to construct rock buttresses founded on in-situ rock within the borrow pits. The rock buttresses should be constructed of rock fill from the borrow pit excavation. The founding stratum for each rock buttress should be inspected and approved by a competent person.
- > The rock buttresses will be constructed in stages to allow infilling of peat and spoil within cells. The buttress will be constructed of selected rock fill and placed and compacted in suitable layers to form a buttress of sufficient stability to retain the placed peat and spoil.
- Infilling of the peat and spoil will commence at the back edge of the borrow pit and progress towards the borrow pit entrance/rock buttress. Leaving in place upstands/segments of intact rock which will help to retain the placed peat spoil and will allow the borrow pit to be developed and infilled in cells. The contractor excavating the rock will be required to develop the borrow pits in a way which will allow the excavated peat and spoil to be reinstated safely.
- > A number of rock buttresses to form cells with the borrow pits may be required to ensure access for trucks and excavators can be achieved.
- > The rock buttresses should be wide enough to allow construction traffic access for tipping and grading during the placement of the excavated peat and spoil. The permanent side slopes of the rock buttress should be constructed between 40 to 60 degrees.



- A rock buttress will be required on the downslope side of the borrow pits to safely retain the infilled peat and spoil. The height of the berm constructed will be greater than the height of the reinstated peat and spoil to prevent any surface peat and spoil run-off. A berm up to 6m (approx..) in height will be required.
- > The rock buttress will be founded on granular Glacial Till or bedrock i.e. competent strata. The founding stratum for the rock buttress should be inspected and approved by the Project Geotechnical Engineer.
- > A level surface in the underlying granular Glacial Till or Weathered Bedrock will be prepared before placing and compacting the rock fill used to construct the berms.
- > In order to prevent water retention occurring behind the buttresses, the buttresses will be constructed of coarse boulder fill with a high permeability. The buttress will be constructed of well graded granular rock fill of about 100mm up to typically 500mm in size. In addition, drains will be placed through the buttresses to allow surface water to drain from the surface of the placed peat.
- > The rock buttress will be wide enough (up to 4m) during construction to allow construction traffic access for tipping and grading during the placement of the excavated peat and spoil. The side slopes of the rock buttress will be constructed at between 40 to 60 degrees.
- > The use of temporary access ramps and long reach excavators during the placement of the excavated peat and spoil is likely to be required.
- > The surface of the placed peat and spoil should be shaped to allow efficient run-off of surface water from the placed arisings.
- As the berms are slightly higher than the retained peat, drains will be provided at regular intervals through the berms, at the same level as the top of the peat surface, to prevent ponding of water around the edges of the repositories. These drains will be 150mm diameter flexible plastic drainage pipe or equivalent.
- > A layer of geogrid to strengthen the surface of the placed peat and spoil within the borrow pits may be required.
- > An interceptor drain should also be installed upslope of the borrow pit, where necessary. This drain will divert any surface water away from the borrow pit and hence prevent water from ponding and lodging during construction and also when reinstated.
- > Temporary control of groundwater within the borrow pits may be required and measures will be determined as part of the ground investigation programme. A temporary pump and suitable outfall locations will be required during construction.
- > Settlement ponds have been designed at the lower side/outfall location of the borrow pits.
- > The acrotelm shall be placed with the vegetation part of the sod facing the right way up to encourage growth of plants and vegetation at the surface of the peat and spoil within the borrow pits.
- Supervision by the Project Geotechnical Engineer is required for the development of the borrow pits.
- > All the above-mentioned general guidelines and requirements will be implemented by the Contractor during construction.

Further guidelines on the construction of the borrow pit are included within Section 5-4 of the Peat & Spoil Management Plan (Appendix 4-2 of the EIAR)

Post-construction, the borrow pit areas will be permanently secured and a stock-proof fence will be erected around the borrow pit areas to prevent access to these areas. Appropriate health and safety signage will also be erected on this fencing and at locations around the fenced area.



### 2.4.5 **Peat Placement Areas**

A number of areas within the site have been identified as suitable for the placement of peat and are shown in Figure 2-2b. The peat placement areas are located adjacent to the hardstands and foundations of Turbines No. 2, 3, 4, 6, 9, 10, 14, 15, 16, 19, 20 and 21.

The placement of peat and spoil within the peat placement areas will be undertaken as follows:

- > Excavated peat will be place across the clearfell areas around 12 no. of the proposed turbines.
- > The peat placed within these areas will be restricted to a maximum height of 1m. Weak/liquified peat must be placed within the proposed borrow pits and not stored within these areas.
- > The placement of excavated peat will be avoided without first establishing the adequacy of the ground to support the load. The placement of peat and spoil within the placement areas will be carried out using long reach excavators, low ground pressure machinery and possibly bog mats in particular for drainage works.
- > Where there is any doubt as to the stability of the peat surface, no material shall be placed on to the peat surface. The risk of peat instability is reduced by not placing any loading onto the peat surface.
- It should be ensured that the surface of the placed peat is shaped to allow efficient run-off of surface water. Shaping of the surface of the peat should be carried out as placement of peat within the placement area progresses. This will reduce the likelihood of debris run-off and reduce the risk of instability in the placed peat.
- Finished/shaped side slopes in the placed peat shall not be greater than 1(v): 4(h). This slope inclination will be reviewed during construction as appropriate.
- > When placing peat, the acrotelm shall be placed on the finished surface with the vegetation part of the sod facing the right wat up to encourage growth of plants and vegetation at the surface of the placed peat within the placement areas.
- > Movement monitoring instrumentation will be placed around the areas where peat has been placed. The locations where monitoring is required will be identified by the designer on site.
- Supervision by the Project Geotechnical Engineer is required for the establishment of the peat placement areas.
- > An interceptor drain will be installed upslope of the designated peat placement areas to divert any surface water away from these areas. This will help to ensure stability of the placed peat and reduce the likelihood of debris run-off.
- > All of the above-mentioned guidelines and requirements will be confirmed by the designer prior to construction.

## 2.4.6 **Tree Felling**

The majority of the site (62%) currently comprises commercial coniferous forestry plantation. As part of the Proposed Development, tree felling will be required within and around the development footprint to allow the construction of turbine bases, access roads and the other ancillary infrastructure.

A total of 117 hectares of forestry will be permanently felled within and around the footprint of the Proposed Development in order to facilitate infrastructure construction and turbine erection.

The tree felling activities required as part of the Proposed Development will be the subject of a Limited Felling Licence (LFL) application to the Forest Service in accordance with the Forestry Act 2014 and the Forestry Regulations 2017 (SI 191/2017) and as per the Forest Service's policy on granting felling licenses for wind farm developments.



The estimated 117 hectares that will be permanently felled for the footprint of the turbines and the other infrastructure and turbine erection will be replaced or replanted on a hectare for hectare basis as a condition of any felling licence that might be issued in respect of the Proposed Development. Replanting is a requirement of the Forestry Act and is primarily a matter for the statutory licensing processes that are under the control of the Forest service.

The proposed methodology for the forestry felling activities is as follows:

Felling works will conform to current best practice Forest Service policies and strategic guidance documents as well as Coillte produced guidance documents, including the specific guidelines listed below, to ensure that the felling works provides minimal potential impacts to the receiving environment.

- 'Standards for Felling and Reforestation' (Department of Agriculture, Food and the Marine, 2019)
- > 'Forest Operations & Water Protection Guidelines' (Coillte, 2009)
- > 'Methodology for Clear Felling Harvesting Operations' (Coillte, 2009)
- > 'Forestry and Water Quality Guidelines' (Forest Service, 2000)
- > 'Forestry Biodiversity Guidelines' (Forest Service, 2000)
- > 'Forestry Protection Guidelines' (Forest Service, 2002)
- > 'Forestry Harvesting and Environmental Guidelines' (Forest Service, 2000)

The proposed methodology for the forestry felling activities is as follows:

- > The extent of all necessary forestry felling areas will be identified and demarcated with markings on the ground in advance of any felling commencing.
- > All roads and culverts will be inspected by the ECoW and contractor prior to any machinery being brought on site to commence the felling operation.
- Existing drains that drain an area to be felled towards surface watercourses will be blocked, and temporary silt/sediment traps (i.e., check dam / silt fence) will be constructed to ensure collection of all silt within felling areas. These temporary silt traps will be cleaned out and backfilled once felling works are complete. This ensures there is no residual collected silt remaining in blocked drains after felling works are completed.
- New collector drains and sediment traps will be installed during ground preparation to intercept water upgradient of felling areas and divert it away. Collector drains will be excavated at an acute angle to the contour (0.3%-3% gradient), to minimise flow velocities.
- Sediment traps will be sited in drains downstream of felling areas. Machine access will be maintained to enable the accumulated sediment to be excavated.
- Sediment removed from traps will be carefully disposed of in the peat repository areas.
- Machine combinations (i.e. hand-held or mechanical) will be chosen which are most suitable for ground conditions at the time of felling, and which will minimise soils disturbance; however, the general proposed machine combination will comprise a harvester and a low-ground pressure harvester with a 14-tonne bunk capacity.
- Trees will be cut manually inside the 50m construction watercourse buffer and using machinery to extract whole trees only;
- > Brash mats will be put in place to support vehicles on soft ground, reducing peat and mineral soils erosion and avoiding the formation of rutted areas, in which surface water ponding can occur.
- Brash mat renewal will take place when they become heavily used and worn. Provision will be made for brash mats along all off-road routes, to protect the soil from compaction and rutting.
- > No tracking of vehicles through watercourses will occur. Vehicles will only use existing road infrastructure and established watercourse crossings.



- > Brash which has not been pushed into the soil may be moved to facilitate the creation of mats elsewhere within the site.
- > Extraction routes, and hence brash mats, will be aligned parallel to the ground contours where possible.
- > Harvested timber will be stacked in dry areas, and outside any 50-metre watercourse buffer zone prior to removal off site to authorised saw mills.

## 2.4.7 Site Drainage Systems

The early establishment of temporary drainage facilities will manage the risk of impacts on watercourses on and adjacent to the site during construction. In addition, construction operations will adopt best working practices which are outlined in section 3.2.3 Best Practice Guidelines below. The development of the site will be phased accordingly. The construction of the drainage will start from the downstream sections and progress upstream, connecting conveyance systems with other drainage features as each development phase progresses. They will be designed with sufficient flexibility to respond to an early phase incoming flow during the construction phase.

Detailed measures to address surface water management based upon the design criteria and philosophy will be implemented. The drainage system will be excavated and constructed in conjunction with the road and hard standing construction. Drains will be excavated, and settlement ponds constructed to eliminate any suspended solids within surface water running off the site. Surface water management and drainage design is dealt with in Section 4.7 of the EIAR and in the Surface Water Management Plan (included as Appendix 4-4 of the EIAR).

## 2.4.8 Site Access Roads

The road construction design has taken into account the following key factors as stated in the Fehily Timoney & Company's (FT) Peat & Spoil Management Plan in Appendix 4-2 of the EIAR:

- > Buildability considerations
- Serviceability requirements for construction and wind turbine delivery and maintenance vehicles
- > Minimise excavation arising
- > Requirement to minimise disruption to peat hydrology

Whilst the above key factors are used to determine the road design the actual construction technique employed for a particular length of road are determined on the prevailing ground conditions encountered along that length of road.

The proposed upgrade to existing roadways and construction of new roadways will incorporate passing bays to allow traffic to pass easily while traveling around the site.

The 2 no. road construction types proposed are as follows:

Existing Roads to be Upgraded

 Excavate and Replace

 Proposed New Roads

 Excavate and Replace

The locations where the above construction types are proposed is shown in Figure 1-1 of the Peat & Spoil Management Plan. This document is included as Appendix 4-2 of this EIAR.



### 2.4.8.1 Upgrade to Existing Roads or Tracks

It is proposed to utilise the existing road network at the site as much as possible (approximately 8km will be used). The general construction methodology for upgrading of existing sections of excavated roads or tracks, as presented in Fehily Timoney's Peat & Spoil Management Plan in Appendix 4-2, is summarised below. This methodology includes procedures that are to be included in the construction to minimise any adverse impact on peat stability.

- Access road construction will be to the line and level requirements as per design/planning conditions.
- > For upgrading of existing excavated access tracks the following guidelines apply:
  - (a) Excavation of the widened section of access road will take place to a competent stratum beneath the peat, removing all peat and soft clay and backfilled with suitable granular fill.
  - *(b)* Benching of the excavation will be required between the existing section of access road and the widened section of access road where the depth of excavation exceeds 500mm.
  - (c) The surface of the existing access track will be overlaid with up to 500mm of selected granular fill.
  - (d) Access roads will be finished with a layer of capping across the full width of the track.
  - (e) A layer of geogrid/geotextile will be implemented at the surface of the existing access track where the existing track shows signs of excessive rutting, etc.
  - (f) For excavations in peat, side slopes will be not greater than 1(v): 3 (h). This slope inclination will be reviewed during construction, as appropriate. Where areas of weaker peat are encountered then slacker slopes will be required.
- > The finished road width will have a running width of 5m, with wider sections on bends and corners.
- > On side long sloping ground any road widening works required will be done on the upslope side of the existing access road, where possible.

#### 2.4.8.2 Construction of New Excavated Roads

The excavation of peat and spoil and founding of access roads on competent stratum (below the peat) for new access roads will be carried out at various locations on the site. The proposed locations for new access roads on site are shown in Figure 2-2b.

Excavate and replace type access roads are the conventional method for construction of access roads on peatland sites provided sufficient placement/reinstatement capacity is available on site for the excavated peat. The following process will be implemented:

- > Prior to commencing the construction of the excavated roads movement monitoring posts will be installed in areas where the peat depth is greater than 2.0m.
- > Interceptor drains will be installed upslope of the access road alignment to divert any surface water away from the construction area.
- Excavation of roads will be to the line and level given in the design requirements. Excavation will take place to a competent stratum beneath the peat.
- Road construction will be carried out in sections of approximately 50m lengths i.e. no more than 50m of access road should be excavated without re-placement with stone fill.
- Once excavated, peat will be temporarily stored in localised areas adjacent to excavations for roads and hardstands before being placed into the permanent peat storage areas within the borrow pits. All peat placement areas will be upslope of founded roads/hardstands and will be inspected by the Projects Geotechnical Engineer before material is stored in the area.
- **Excavation of materials with respect to control of peat stability:**



- (a) Acrotelm (top about 0.3 to 0.4m of peat) will be required for landscaping and will be stripped and temporarily stockpiled for re-use. Acrotelm stripping will be undertaken prior to main excavations.
- *(b)* Where possible, the acrotelm will be placed with the vegetation part of the sod facing the right way up to encourage growth of plants and vegetation.
- (c) All catotelm peat (peat below about 0.3 to 0.4m depth) will be transported immediately on excavation to the designated peat placement areas.
- Excavated side slopes in peat shall not be greater than 1 (v): 3 (h). This slope inclination will be reviewed during construction, as appropriate. Should areas of weaker peat be encountered then slacker slopes will be required. Battering of the side slopes of the excavations will be carried out as the excavation progresses.
- End-tipping of stone onto the road during the construction/upgrading of the access road will be carefully monitored to ensure that excessive impact loading, which may adversely affect the adjacent peat, is limited.
- The excavated access road will be constructed with a minimum of 1000mm of selected granular fill. Granular fill to be placed and compacted in layers in accordance with the TII Specification for Road Works.
- > A layer of geogrid/geotextile may be required at the surface of the competent stratum.
- Where slopes of greater than 5 degrees are encountered along with relatively deep peat (i.e. greater than 1.5m) and where it is proposed to construct the access road perpendicular to the slope contours it is best practice to start construction at the bottom of the slope and work towards the top, where possible. This method avoids any unnecessary loading to the adjacent peat and greatly reduces any risk of peat instability.
- > A final surface layer will be placed over the excavated road and graded to accommodate wind turbine construction and delivery traffic.
- The construction and upgrading of access roads in areas of deep peat (greater than 2m) will be inspected on a routine basis (by the Site manager/Ecological Clerk of Works/Project Geotechnical Engineer) during the works, particularly before/following trafficking by heavy vehicular loads.

## 2.4.9 **Turbine and Meteorological Mast Foundations**

The wind turbines and meteorological mast foundations will be a reinforced concrete base designed to Eurocode 2/BS8110. Foundation loads will be provided by wind turbine and mast supplier, and factors of safety will be applied to these in accordance with European design regulations. The turbine will be anchored to the foundation using a bolt assembly which shall be cast into the concrete. The meteorological mast is a free-standing structure which is also anchored to the reinforced concrete foundation. It is anticipated that the foundations for both the turbines and the meteorological mast will be ground bearing foundations and that the formation level of the turbine foundations will be on the lower mineral subsoil or bedrock. For completeness and depending on findings of the confirmatory ground investigations, reinforced concrete-piled foundations have also been considered. Turbine bases will measure approximately 25 metres in diameter, while the meteorological mast base will measure approximately 25 square metres. They will be formed a minimum of one metre below the base of the peat layer on stiff subsoil material or bedrock, or at a suitable level directed by the Geotechnical Engineer/Designer. The foundations will be constructed as follows:

- > The extent of the excavation will be marked out and will include an allowance for trimming the sides of the excavation to provide a safe working area and slope batter;
- Where practical, the peat will be stripped over the area of the excavation and stored locally for reuse, the subsoil will be excavated and stored to one side for reuse during the landscaping around the finished turbine;
- No material will be removed from site and storage areas will be stripped of vegetation prior to stockpiling in line with best working practices;
- > All groundwater and surface water arising from turbine base excavation will be pumped to the dirty water system prior to discharge from the works area;



- Soil excavation shall be observed by a qualified archaeologist in accordance with a scheme of archaeological monitoring to identify any significant remains as they come to light and,
- > The foundation excavation will be raised to formation level by compacted layers of well graded granular material, spread and compacted to provide a hard area for the turbine foundation.

Standard excavated reinforced concrete bases will be completed as follows:

- A layer of concrete blinding will be laid approximately 75mm thick directly on top of the newly exposed formation, tamped and finished with a screed board to leave a flat level surface. The concrete will be protected from rainfall during curing and all surface water runoff from the curing concrete should be prevented from entering surface water drainage directly;
- > High tensile steel reinforcement will be fixed in accordance with the designer's drawings & schedules. The foundation anchorage system will be installed, levelled and secured to the blinding using steel box section stools;
- > Ductwork will be installed as required, and formwork erected around the steel cage and propped from the backside as required;
- > The foundation anchorage system will be checked both for level and line prior to the concrete being installed in the base. These checks will be passed to turbine manufacturer for their approval;
- Concrete will be placed using a concrete pump and compacted using vibrating pokers to the levels and profile indicated on the drawings. Upon completion of the concreting works the foundation base will be covered and allowed to cure;
- > Steel shutters will be used to pour the circular chimney section;
- > Earth wires will be placed around the base; and,
- > The foundation will be backfilled with a cohesive material, where possible using the material arising during the excavation and landscaped using the vegetable soil set aside during the excavation.
- Soil, rock and other materials excavated during construction shall be managed in line with the recommendations/ best practice guidelines outlined in Section 4.3.4 of Chapter 4 of the EIAR.

Reinforced concrete piled foundations will be completed as follows:

- > The extent of the excavation will be marked out and will include an allowance for trimming the sides of the excavation to provide a safe working area and slope batter;
- No material will be removed from site and placement areas will be stripped of vegetation prior to placement in line with best working practices;
- A piling platform for the piling rig will be constructed. This will be done by laying geotextile on the existing surface and a stone layer will then be placed on top of the geotextile by an excavator and compacted in order to give the platform sufficient bearing capacity for the piling rig.
  - The piling rig, fitted with an auger, will then bore through the soft material with a sleeve fitted around the auger to prevent the sidewalls of the peat from collapsing. The borehole is then extended to a suitable depth into the subsoil/bedrock.
  - > When the auger and the sleeve are removed high tensile steel cages will be lowered into the boreholes. These steel cages will extrude above the level of the top of the concrete pile.
  - > As the auger is removed concrete is pumped into the borehole.
  - > Reinforcing steel on the top of the pile will tie to the foundation base steel.
  - > The procedure for standard excavated reinforced concrete bases as outlined below can be applied from here.



#### 2.4.9.1 **Crane Hardstands**

All crane pads will be designed taking account of the loadings provided by the turbine manufacturer and will consist of a compacted stone structure. The crane hardstands will be constructed in a similar manner to the excavated site roads and will measure approximately to the turbine manufacturer's requirements. The position of the crane pads varies between turbine locations depending on topography, position of the site access road, and the turbine position.

## 2.4.10 Onsite Electricity Substation and Control Buildings

Once tree felling as described in Section 2.4.2.3, above, is completed, the onsite substation will be constructed by the following methodology:

- > The area of the onsite substation will be marked out using ranging rods or wooden posts and the soil and overburden stripped and removed to nearby temporary storage area for later use in landscaping. Any excess material will be sent to one of the on-site peat repositories or the proposed borrow pit, for reinstatement purposes.
- > The dimensions of the onsite substation area have been designed to meet the requirements of the ESB/Eirgrid and the necessary equipment to safely and efficiently operate the proposed wind farm;
- > 2 no. control buildings will be built within the onsite substation compound;
- > The foundations will be excavated down to the level indicated by the designer and appropriately shuttered reinforced concrete will be laid over it. An anti-bleeding admixture will be included in the concrete mix;
- The block work walls will be built up from the footings to DPC level and the floor slab constructed, having first located any ducts or trenches required by the follow on mechanical and electrical contractors;
- The block work will then be raised to wall plate level and the gables & internal partition walls formed. Scaffold will be erected around the outside of the building for this operation;
- > The roof slabs will be lifted into position using an adequately sized mobile crane;
- The timber roof trusses will then be lifted into position using a telescopic load all or mobile crane depending on site conditions. The roof trusses will then be felted, battened, tiled and sealed against the weather.
- > The electrical equipment will be installed and commissioned.
- > Perimeter fencing will be erected.
- > The construction and components of the substation will be to ESB/Eirgrid specifications.

### 2.4.11 Site Underground Cabling

The transformer in each turbine is connected to the substation through a network of buried electrical cables. Fibre-optic cables will also connect each wind turbine to the wind farm control building in the substation compound. The internal site cabling trenches will be located within the footprint of the wind farm site roads. The ground is trenched using a mechanical excavator. The top layer of granular fill is removed and saved so that it is replaced on completion. The cables are bedded with suitable material unless the ground conditions are such that no bedding is required. The depth of the cables are to meet all national and international requirements and will generally be up to 1.2 m below ground level, depending on the ground conditions that are encountered. A suitable marking tape is installed between the cables and the surface. On completion the ground will be reinstated as per its original condition.

Clay plugs will be installed at regular intervals of not greater than 50 metres along the length of the trenches where required to prevent the trenches becoming conduits for runoff water. While the majority of the cable trenches will be backfilled with native material, clay subsoils of low permeability will be used to prevent conduit flow in the backfilled trenches. This material will be imported onto the site



from local, authorised quarries should sufficient volumes not be encountered during the excavation phase of roadway and turbine foundation construction.

## 2.4.12 Grid Connection Construction Methodology

The underground cabling (UGC) works will consist of the installation of 6 No. ducts in an excavated trench to accommodate 3 No. power ducts, 2 No. fibre communications ducts to allow communications between the Sheskin South Wind Farm Substation and the existing Bellacorick 110kV substation and 1 No. earth continuity conductor duct.

The power cable ducts will accommodate the power cables and the communications duct will accommodate a fibre cable to allow communications between the 110kV Sheskin South Wind Farm substation and the existing 110kV Bellacorick substation. The ducts will be installed and the trench will be reinstated in accordance with landowner or local authority specification, and then the electrical cabling/fibre cable is pulled through the installed ducts in approximately every 700m to 850m. Construction methodologies to be implemented and materials to be used will ensure that the UGC is installed in accordance with the requirements and specifications of Eirgrid.

The underground cable required to facilitate the grid connection will be laid beneath the surface of the site and/or public road using the following the methodology summarised below, and outlined in detail in TLI Group's *Sheskin South Wind Farm 110kV Grid Connection – Construction Methodology* included as Appendix 4-5 of this EIAR:

- The Contractor, and their appointed Site Manager, will prepare a targeted Method Statement concisely outlining the construction methodology and incorporating all mitigation and control measures included within the EIAR and as required by planning conditions where relevant;
- > All existing underground services along the UGC route shall be confirmed prior to the commencement of construction works;
- Traffic management measures will be implemented in accordance with those included in Section 14.1 of the EIAR, and a detailed Traffic Management Plan will be prepared and agreed with Mayo County Council;
- The excavated trench will be approximately 825mm in width and approximately 1315mm deep both within the public road network and within private lands;
- > The 160mm diameter HDPE cable ducting will be placed into the prepared trench, inspected and backfilled.
- Excavated material will be temporarily stockpiled onsite for re-use during reinstatement. Stockpiles will be restricted to less than 2m in height. Stockpiles will be located a minimum of 50m from surface water features and all stockpiling locations will be subject to approval by the Site Manager and Project Environmental Clerk of Works (ECoW);
- Excavated material shall be employed to backfill the trench where appropriate and any surplus material will be transported to on of the two proposed on-site borrow pits;
- > Any earthen (sod) banks to be excavated will be carefully opened with the surface sods being stored separately and maintained for use during reinstatement;
- > The excavated trench will be dewatered if required, from a sump installed within the low section of the opened trench. Where dewatering is required, dirty water will be fully and appropriately attenuated, through silt bags, before being appropriately discharged to vegetation or surface water drainage feature (please refer to Chapter 9 of the EIAR);
- > Where required, grass will be reinstated by either seeding or by replacing with grass turves;



- No more than a 100m section of trench will be opened at any one time. The second 100m will only be excavated once the majority of reinstatement has been completed on the first;
- > The excavation, installation and reinstatement process will take on average of 1 no. day to complete a 100m section;
- > Where the cable is being installed in a roadway, temporary reinstatement may be provided to allow larger sections of road to be permanently reinstated together;
- Works will only be conducted in normal working hours of Monday to Friday 07:00 to 19:00 and Saturday 07:00 to 13:00, with no works on Sundays or Bank Holidays except in exceptional circumstances or in the event of ana emergency;
- Following the installation of ducting, pulling the cable will take approximately 1 no. day.
- > At watercourse crossings, the contractor will be required to adhere to the environmental control measures outlined within the EIAR, the CEMP and best practice construction methodologies;



Plate 2-1 Cable Trench View

#### 2.4.12.1 Existing Underground Services

In order to facilitate the installation of an underground grid connection, it may be necessary to relocate existing underground services such as water mains or existing cables. In advance of any construction activity, the contractor will undertake pre-commencement surveys of the proposed route to confirm the presence or otherwise of any services. If found to be present, the relevant service provider will be consulted with in order to determine the requirement for specific excavation or relocation methods and to schedule a suitable time to carry out works.

If existing low voltage underground cables are found be present, a trench will be excavated, and new ducting and cabling will be installed along the new alignment and connected to the network on either end. The trench will be backfilled with suitable material to the required specification. Warning strip and marking tape will be laid at various depths over the cables as required. Marker posts and plates will be installed at surface level to identify the new alignment of the underground cable, the underground cables will then be re-energised.



In the event that water mains are encountered the water supply will be turned off by the utility so work can commence on diverting the service. The section of existing pipe will be removed and will be replaced with a new pipe along the new alignment of the service. The works will be carried out in accordance with the specifications of the relevant utility provider.

#### 2.4.12.2 Joint Bays

Joints Bays are to be provided approximately every 700m to 850m along the UGC routes to facilitate the jointing of 2 no. lengths of UGC. 110kV Joint Bays are typically 2.5m x 6m x 2.05m pre-cast concrete structures installed below finished ground level. Joint Bays will be located in the non-wheel bearing strip of roadways, however given the narrow profile of local roads this may not always be possible.

In association with Joint Bays, Communication Chambers are required at every joint bay location to facilitate communication links between Sheskin South Wind Farm and the existing Bellacorick 110kV Substation. Earth sheath links are used for earthing and bonding cable sheaths of underground power cables, installed in a flat formation so that the circulating currents and induced voltages are eliminated or reduced. Earth sheath link chambers and communication chambers are located close to joint bays. Earth sheath link chambers and communication chambers will typically be pre-cast concrete structures with an access cover at the finished surface level.

Marker posts will be used on non-roadway routes to delineate the duct route and joint bay positions. The marker posts will consist of a corrosion-proof aluminium triangular danger sign, with a 750mm base, and with a centred lightning symbol, on engineering grade fluorescent yellow background.

They will be installed inadequately sized concrete foundations and will also be placed where the cable has not been buried to the standard depth, due to existing road conditions. Drawings of the joint bays and communication chambers are included within this planning package.

The precise siting of all Joint Bays, Earth Sheath Link Chambers and Communication Chambers, within the curtilage of the public road, is subject to approval by ESBN and EirGrid.

The locations of the joint bays are shown in the grid connection layout drawings in Appendix 4-6 of this EIAR.

#### 2.4.12.3 Grid Connection Watercourse/Culvert Crossings

The cable route will involve 3 No. bridge crossings including 2 No. HDD crossings. Where the cable route intersects with existing watercourses, a detailed construction method statement will be prepared by the Contractor prior to the commencement of construction and is to be approved by the Local Authority and relevant environmental agencies. The cable will be located within the bridge deck where there is sufficient depth and width available on the bridge, where there is insufficient depth and width available horizontal directional drilling (HDD) may be employed as an alternative.

Bridge 1 crosses over a tributary stream to the Owenmore River on the N59. Sufficient clearance exists within the bridge structure and therefore the bridge can be crossed utilising the ducts in a flat formation method in the bridge deck.

Bridge 2 crosses over a tributary stream to the Owenmore River on the N59. Insufficient clearance exists within the bridge structure and therefore the bridge will be crossed utilising the HDD method. The HDD methodology is outlined in detail in Section 8.6 of Appendix 4-6 of the EIAR.

Bridge 3 is located on the forestry access roadway crossing over a large stream. Bridge 3 has insufficient room to install the cable to the bridge will be crossed utilising the HDD method.



The underground cable will encounter no. 9 culverts along the route. Where the cable route intersects with existing watercourses, a detailed construction method statement will be prepared by the Contractor prior to the commencement of construction and is to be approved by the Local Authority and relevant environmental agencies.

Existing culverts will be crossed using open trenching with either an undercrossing or an overcrossing, depending on the depth of the culvert. A confirmatory site survey of all culverts has been completed as part of this phase of the project prior to planning to confirm the crossing methods.

The bridge and culvert crossing locations are shown on the grid connection layout drawings in Appendix 4-6 of the EIAR. The detail bridge and culvert crossing methods are detailed in the following drawings in the same appendix:

- > Bridge 1: Drawing No. 05796-DR-250
- > Bridge 2: Drawing No. 05796-DR-251
- > Bridge 3: Drawing No. 05796-DR-252
- Culvert/Service Crossing: 05796-DR-115

Inland Fisheries Ireland have published guidelines relating to construction works along water bodies entitled 'Requirements for the Protection of Fisheries Habitats during Construction and Development Works at River Sites", and these guidelines will be adhered to during the construction of the development.

#### 2.4.12.3.1 Horizontal Directional Drilling

It is proposed to implement Horizontal Directional Drilling (HDD) for 2 no. crossings.

Horizontal Direction Drilling (HDD) is a method of drilling under obstacles such as bridges, culverts, railways, water courses, etc. in order to install cable ducts under the obstacle. This method is employed where installing the ducts using standard installation methods is not possible. The proposed HDD methodology, as per Section 8 is as follows: -

- A works area of circa .40 square metres will be fenced on both sides of a crossing
- > The drilling rig and fluid handling units will be located on one side of the bridge and will be stored on double bunded 0.5mm PVC bunds which will contain any fluid spills and storm water run-off.
- > Entry and exit pits (1m x 1m x 2m) will be excavated using an excavator, the excavated material will be temporarily stored within the works area and used for reinstatement or disposed of to a licensed facility.
- A 1m x 1m x 2m steel box will be placed in each pit. This box will contain any drilling fluid returns from the borehole.
- > The drill bit will be set up by a surveyor, and the driller will push the drill string into the ground and will steer the bore path under the watercourse.
- A surveyor will monitor drilling works to ensure that the modelled stresses and collapse pressures are not exceeded.
- > The drilled cuttings will be flushed back by drilling fluid to the steel box in the entry pit.
- Once the first pilot hole has been completed a hole-opener or back reamer will be fitted in the exit pit and will pull a drill pipe back through the bore to the entry side.
- > Once all bore holes have been completed, a towing assembly will be set up on the drill and this will pull the ducting into the bore.
- > The steel boxes will be removed, with the drilling fluid disposed of to a licensed facility.
- > The ducts will be cleaned and proven and their installed location surveyed.
- > The entry and exit pits will be reinstated to the specification of ESB Networks and the Mayo County Council/landowner.



> A transition coupler will be installed at either side of the bridge/ following the horizontal directional drilling as per ESBN and EirGrid requirements, this will join the HDD ducts to the standard ducts.

## 2.4.13 Culvert Crossings on the Wind Farm Site

Culverts will be required where site roads, crane pads and turbine pads cross main forestry drainage networks.

Culverts will be installed with a minimum internal gradient of 1% (1 in 100). Smaller culverts will have a smooth internal surface. The use of corrugated surfaces will be confirmed by the Project Ecologist and Project Hydrologist. Depending on the management of water on the downstream side of the culvert, large stone may be used to interrupt the flow of water. This will help dissipate its energy and help prevent problems of erosion. Smaller water crossings will simply consist of an appropriately sized pipe buried in the sub-base of the road at the necessary invert level to ensure ponding or pooling doesn't occur above or below the culvert and water can continue to flow as necessary.

All culverts will be inspected regularly to ensure they are not blocked by debris, vegetation or any other material that may impede conveyance. Any watercourse crossings required will be installed outside of the salmonid spawning season, October to June in any year, in accordance with Inland Fisheries Ireland best practice (IFI, 2016). This will ensure no potential impacts on salmonid spawning habitat.

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

## 2.4.14 Wind Farm Site Watercourse/Service Crossings

There are a number of natural watercourse and a Gas Networks Ireland pipeline (service) within the site of the Proposed Development.

It is proposed to construct clear-span crossings watercourse/service crossings along the wind farm access roads at 12 no. locations using a bottomless box culvert. The locations of these crossings are shown on the layout drawings included in Appendix 4-1 of this EIAR. The clear-span watercourse/service crossing methodologies presented below will ensure that no instream works are necessary.

The standard construction methodology for the installation of a pre-cast concrete bottomless box culvert crossing is as follows:

- > The access road on the approach either side of the watercourse/service will be completed to a formation level which is suitable for the passing of plant and equipment required for the installation of the watercourse crossing.-
- > All drainage measures along the proposed road will be installed in advance of the works.
- A foundation base will be excavated to rock or competent ground with a mechanical excavator with the foundation formed in-situ using a semi-dry concrete lean mix. For watercourse crossings, the base will be excavated along the stream bank with no instream works required.
- Access to the opposite side of the watercourse/service for excavation and foundation installation will require the installation of pre-cast concrete slab across the watercourse to provide temporary access for the excavator. Plant and equipment will not be permitted to track across the watercourse.
- > Once the foundation base has been completed, the pre-cast concrete box culvert will be installed using a crane which will be set up on the bank of the watercourse/ on the



nearest existing road to the service and will be lifted into place with no contact with the watercourse/service.

- > Where the box culvert is installed in sections, the joints will be sealed to prevent granular material entering the watercourse,
- > Once the crossing is in position stone backfill will be placed and compacted against the structure up to the top of the box culvert above the foundations.

The watercourse crossings will be constructed to the specifications of the OPW bridge design guidelines 'Construction, Replacement or Alteration of Bridges and Culverts - A Guide to Applying for Consent under Section 50 of the Arterial Drainage Act, 1945', and in consultation with Inland Fisheries Ireland. Abutments will be constructed from precast units combined with in-situ foundations, placed within an acceptable backfill material.

The service crossings will be constructed in accordance with Gas Networks Ireland *Code of Practice 2021*. These crossing designs will be approved by GNI before works commence on site.

Confirmatory inspections of each proposed new watercourse crossing location will be carried out by the project civil/structural engineer and the project hydrologist prior to the construction of each crossing.

Proposed Mitigation Measures for watercourse crossings are detailed below as detailed in Section 9.3 of the EIAR and are summarised as follows:

- > All stream crossings will be bottomless-box or clear span culverts. Existing banks will remain undisturbed.
- > Where proposed underground cabling routes follow an existing road or a road proposed for upgrade, cables will pass over or below the culvert within the access road.
- > All guidance/mitigation measures proposed by the OPW or IFI are incorporated into the design of proposed crossings.
- As a further precaution, near-stream construction work will only be carried out during the period permitted by IFI for in-stream works according to the guidance document "Guidelines on protection of fisheries during construction works in and adjacent to waters" (IFI, 2016). The relevant period is July to September inclusive, i.e. the typically drier summer period. Any deviation that may be temporarily necessary will be done in discussion with the IFI.
- > During near-stream construction works (mainly roads), double-row silt fences will be emplaced immediately downgradient of the construction area for the duration of the construction phase.
- All new river/stream crossings will require a Section 50 application (Arterial Drainage Act, 1945). The river/stream crossings will be designed in accordance with OPW guidelines/requirements on applying for a Section 50 consent.

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



## 2.4.15 **Decommissioning**

The wind turbines proposed as part of the Proposed Development are expected to have a lifespan of 35 years. Following the end of their useful life, the wind turbines may be replaced with a new set of turbines, subject to planning permission being obtained, or the Proposed Development will be decommissioned fully. The onsite substation will remain in place as it will be under the ownership of the ESB and will form a permanent part of the national electricity grid.

Upon decommissioning of the Proposed Development, the wind turbines would be disassembled in reverse order to how they were erected. All above ground turbine components would be separated and removed off-site for recycling. Turbine foundations would remain in place underground and will be covered with earth and reseeded as appropriate. Leaving the turbine foundations in-situ is considered a more environmentally prudent option, as to remove that volume of reinforced concrete from the ground could result in significant environment nuisances such as noise, dust and/or vibration. Site roadways will be left in situ, for future forestry operations. The amenity and recreation infrastructure will also be left in-situ. Underground cables, including grid connection, will be removed and the ducting left in place.

A Decommissioning Plan has been prepared and included as Appendix 4-7 of the EIAR, which will be agreed with the local authority prior to any decommissioning. The plan provides details of the methodologies that will be adopted, throughout decommissioning, the environmental controls that will be implemented, the Emergency Response Procedure to be adopted, methods for reviewing compliance and an indicative programme of decommissioning works.

The Decommissioning Plan will be updated prior to the end of the operational period in line with decommissioning methodologies that may exist at the time and will be agreed with the competent authority at that time. The potential for effects during the decommissioning phase of the proposed renewable energy development have been assessed in the EIAR.

As noted in the Scottish Natural Heritage report (SNH) Research and Guidance on Restoration and Decommissioning of Onshore Wind Farms (SNH, 2013) reinstatement proposals for a wind farm are made approximately 30 years in advance, so within the lifespan of the wind farm, technological advances and preferred approaches to reinstatement are likely to change. According to the SNH guidance, it is therefore:

"best practice not to limit options too far in advance of actual decommissioning but to maintain informed flexibility until close to the end-of-life of the wind farm".



## 3. ENVIRONMENTAL MANAGEMENT

### 3.1 Introduction

This CEMP includes all best practice measures required to construct the proposed renewable energy development. The drainage proposals will be developed further prior to the commencement of construction however, any such improvements will be in line with the principles set out here and will also be in full compliance with the planning consent and mitigation measures as presented in the EIAR, NIS and all other relevant planning documents. The following sections give an overview of the drainage design, dust and noise control measures and a waste management plan for the site.

While the drainage design measures are presented in Chapter 4 of the EIAR and the drainage management measures and water quality and monitoring measures are included in this CEMP, the Surface Water Management Plan compiles all of these into a single document. The SWMP is an accompanying document for this CEMP and is included as Appendix 4-4 of the EIAR.

## 3.2 **Protecting Water Quality**

## 3.2.1 Good Environmental Management During Construction

Timing of works can strongly influence the potential for damaging the freshwater environment. Operations during wetter periods of the year pose a significantly greater risk of causing erosion and siltation, which can be particularly severe following major rainfall or snowmelt events. Traditionally, wind farm construction undertaken during the drier summer months will result in significantly less erosion and siltation. Construction activities in the hydrological buffer zones shall be avoided during or after prolonged rainfall or an intense rainfall event and work will cease entirely near watercourses when it is evident that water quality could potentially be impacted. Given that this site has an established drainage network and existing watercourse crossing points, there will be no adverse impacts on watercourses.

## 3.2.2 Site Drainage Principles

The site drainage features have been outlined in Chapter 4, Section 4.7 of the EIAR in addition to the drainage design and management for the Proposed Development. The protection of the watercourses within and surrounding the site, and downstream catchments that they feed is of utmost importance in considering the most appropriate drainage proposals for the site of the Proposed Development. The Proposed Development's drainage design has therefore been proposed specifically with the intention of having no negative impact on the water quality of the site and its associated rivers and lakes, and consequently no impact on downstream catchments and ecological ecosystems.

No routes of any natural drainage features will be altered as part of the Proposed Development. Turbine locations and associated new roadways were originally selected to avoid natural watercourses, and existing roads are to be used wherever possible. There will be no direct discharges to any natural watercourses, with all drainage waters being dispersed as overland flows. All discharges from the proposed works areas will be made over vegetation filters at an appropriate distance from natural watercourses. Buffer zones around the existing natural drainage features have been used to inform the layout of the Proposed Development.

Existing artificial drains in the vicinity of existing site roads will be maintained in their present location where possible. If it is expected that these artificial drains will receive drainage water from works areas,



check dams will be added (as specified below) to control flows and sediment loads in these existing artificial drains. If road widening or improvement works are necessary along the existing roads, where possible, the works will take place on the opposite side of the road to the drain.

## 3.2.3 **Best Practice Guidance**

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

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

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



## 3.2.4 Site Drainage Design and Management

The proposed site drainage features for this site are outlined in Section 4.7 of the EIAR. The following sections give an outline of drainage management arrangements in terms of pre-construction, construction and operational phases of the Proposed Development.

#### 3.2.4.1 **Pre-Construction Drainage**

There is an existing drainage network across the site. There are two main natural watercourses (with multiple tributaries) which drain the Proposed Development site and there are numerous manmade drains that are in place predominately to drain the forestry plantations This existing drainage system will continue to function as it is during the pre-construction phase.

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

Drainage and associated pollution control measures will be implemented onsite before the main construction works commence. Where possible drainage controls will be installed during seasonally dry ground conditions. This will reduce the possibility of impact on surface waters by suspended sediment released during construction and entrained in surface run-off.

#### 3.2.4.2 Construction Phase Drainage

The Project Hydrologist will attend the site to set out and assist with the implementation of the proposed drainage controls as outlined in Section 2.5 of the SWMP and shown in the drainage design drawings included with this planning application. The drainage system will be excavated and constructed in conjunction with the road and hard standing construction. Drains will be excavated and stilling ponds constructed to eliminate any suspended solids within surface water running off the site.

The implementation of a Scheduling of Works Operating Record (SOWOR) will continue through the construction phase of the project. The SOWOR provides a number of abandonment triggers which will ensure that site management are well informed as to the level of incident that will require the abandonment of works. The various triggers both pre-commencement and abandonment ensure best practice in terms of water quality management is maintained prior to commencement and during the various felling and construction phases.

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

In relation to decisions that are made on site it is important to stress that these will be implemented in line with the associated drainage controls and mitigation measures, outlined in Sections 2.5 and 3.3 of the SWMP, and to ensure protection of all watercourses.

#### 3.2.4.2.1 Preparative Site Drainage Management

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



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

#### 3.2.4.2.2 Pre-emptive Site Drainage Management

The works programme for the initial construction stage of the development will also take account of weather forecasts and predicted rainfall in particular. Large excavations and movements of peat/subsoil or vegetation stripping will be suspended or scaled back if heavy rain is forecast. The extent to which works will be scaled back or suspended will relate directly to the amount of rainfall forecast.

The following forecasting systems are available and will be used on a daily basis at the site to direct proposed construction activities:

- General Forecasts: Available on a national, regional and county level from the Met Eireann website (www.met.ie/forecasts). These provide general information on weather patterns including rainfall, wind speed and direction but do not provide any quantitative rainfall estimates;
- MeteoAlarm: Alerts to the possible occurrence of severe weather for the next 2 days. Less useful than general forecasts as only available on a provincial scale;
- > 3-hour Rainfall Maps: Forecast quantitative rainfall amounts for the next 3 hours but does not account for possible heavy localised events;
- Rainfall Radar Images: Images covering the entire country are freely available from the Met Eireann website (www.met.ie/latest/rainfall\_radar.asp). The images are a composite of radar data from Shannon and Dublin airports and give a picture of current rainfall extent and intensity. Images show a quantitative measure of recent rainfall. A 3-hour record is given and is updated every 15 minutes. Radar images are not predictive; and,
- Consultancy Service: Met Eireann provide a 24-hour telephone consultancy service. The forecaster will provide interpretation of weather data and give the best available forecast for the area of interest.

Using the threshold rainfall values, listed below, will allow work to be safely controlled (from a water quality perspective) in the event of forecasting of an impending high rainfall intensity event.

Works will be suspended if forecasting suggests either of the following is likely to occur:

- >10 mm/hr (i.e. high intensity local rainfall events);
- >25 mm in a 24-hour period (heavy frontal rainfall lasting most of the day); or,
- > >half monthly average rainfall in any 7 days.

Prior to works being suspended the following control measures shall be completed:

- Secure all open excavations;
- > Provide temporary or emergency drainage to prevent back-up of surface runoff; and,
- > Avoid working during heavy rainfall (listed above) and for up to 24 hours after heavy events to ensure drainage systems are not overloaded.

#### 3.2.4.2.3 Reactive Site Drainage Management

The detailed drainage plan prepared for the site has provided for reactive management of drainage measures. The effectiveness of drainage measures designed to minimise runoff entering works areas and capture and treat potentially silt-laden water from the works areas, will be monitored continuously by the Environmental Clerk of Works (ECoW) on-site. The ECoW or project hydrologist will respond to changing weather, ground or drainage conditions on the ground as the project proceeds, to ensure the effectiveness of the drainage design is maintained. This may require the installation of additional check



dams, interceptor drains or swales as deemed necessary on-site. The drainage design may have to be modified on the ground as necessary, following a confirmatory inspection by the project hydrologist, and the modifications will draw on the various features outlined in Section 2.5 of the SWMP in whatever combinations are deemed to be most appropriate to the situation on the ground at a particular time.

In the unlikely event that works are giving rise to siltation of watercourses, the ECoW or project hydrologist will stop all works in the immediate area around where the siltation is evident. The source of the siltation will be identified and additional drainage measures, as outlined in Section 2.5 above, will be installed in advance of works recommencing.

### 3.2.4.3 **Operational Phase Drainage Management**

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

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

In the operational phase of the wind farm, the reliance on the drainage system summarised above will become reduced as areas naturally revegetate. Once areas revegetate, this will result in a resumption of the natural drainage management that will have existed prior to any construction.

## 3.2.5 Forestry Felling

Tree felling to facilitate the Proposed Development will commence before the initial construction groundworks on a phased basis across the site.

Water protection measures will reduce the risk of entrainment of suspended solids and nutrient release in surface watercourses. These measures are derived from best practice guidance documents as outlined in Section 3.2.3 above. The water protection measures to be adopted during felling operations are set out as follows:

> The extent of all necessary forestry felling areas will be identified and demarcated with markings on the ground in advance of any felling commencing.



- > All roads and culverts will be inspected by the ECoW and contractor prior to any machinery being brought on site to commence the felling operation.
- Existing drains that drain an area to be felled towards surface watercourses will be blocked, and temporary silt/sediment traps (ie. check dam / silt fence) will be constructed to ensure collection of all silt within felling areas. These temporary silt traps will be cleaned out and backfilled once felling works are complete. This ensures there is no residual collected silt remaining in blocked drains after felling works are completed.
- New collector drains and sediment traps will be installed during ground preparation to intercept water upgradient of felling areas and divert it away. Collector drains will be excavated at an acute angle to the contour (0.3%-3% gradient), to minimise flow velocities.
- Sediment traps will be sited in drains downstream of felling areas. Machine access will be maintained to enable the accumulated sediment to be excavated.
- Sediment removed from traps will be carefully disposed of in the peat repository areas.
- Machine combinations (i.e. hand-held or mechanical) will be chosen which are most suitable for ground conditions at the time of felling, and which will minimise soils disturbance;
- Trees will be cut manually inside the 50m buffer and using machinery to extract whole trees only;
- Checking and maintenance of roads and culverts will be on-going through any felling operation. No tracking of vehicles through watercourses will occur, as vehicles will use road infrastructure and existing watercourse crossing points. Where possible, existing drains will not be disturbed during felling works;
- Ditches which drain from the proposed area to be felled towards existing surface watercourses will be blocked, and temporary silt traps will be constructed. No direct discharge of such ditches to watercourses will occur. Drains and sediment traps will be installed during ground preparation. Collector drains will be excavated at an acute angle to the contour (~0.3%-3% gradient), to minimise flow velocities. Main drains to take the discharge from collector drains will include water drops and rock armour, as required, where there are steep gradients, and shall avoid being placed at right angles to the contour;
- Sediment traps will be sited in drains downstream of felling areas. Machine access will be maintained to enable the accumulated sediment to be excavated. Sediment will be carefully disposed of in the peat disposal areas. Where possible, all new silt traps will be constructed on even ground and not on sloping ground;
- > In areas particularly sensitive to erosion or where felling inside the 50 metre buffer is required, it will be necessary to install double or triple sediment traps.
- > Double silt fencing will also be put down slope of felling areas which are located inside the 50 metre buffer zone;
- > All drainage channels will taper out before entering the aquatic buffer zone. This ensures that discharged water gently fans out over the buffer zone before entering the aquatic zone, with sediment filtered out from the flow by ground vegetation within the zone. On erodible soils, silt traps will be installed at the end of the drainage channels, to the outside of the buffer zone;
- > Drains and silt traps will be maintained throughout all felling works, ensuring that they are clear of sediment build-up and are not severely eroded. Correct drain alignment, spacing and depth will ensure that erosion and sediment build-up are minimized and controlled;
- Brash mats will be used to support vehicles on soft ground, reducing peat and mineral soils erosion and avoiding the formation of rutted areas, in which surface water ponding can occur. Brash mat renewal shall take place when they become heavily used and worn. Provision shall be made for brash mats along all off-road routes, to protect the soil from compaction and rutting. Where there is risk of severe erosion occurring,



extraction shall be suspended during periods of high rainfall (refer to Section 3.2.4.2.2 above) ;

- Timber will be stacked in dry areas, and outside a local 50 metre watercourse buffer. Straw bales and check dams to be emplaced on the down gradient side of timber storage/processing sites;
- > Works will be carried out during periods of no, or low rainfall, in order to minimise entrainment of exposed sediment in surface water run-off;
- Checking and maintenance of roads and culverts will be on-going through the felling operation;
- > No crossing of streams by machinery will be permitted and only travel perpendicular to and away from streams will be allowed;
- Refuelling or maintenance of machinery will not occur within 100m of a watercourse. Mobile bowser, drip kits, trained personnel will be used where refuelling is required;
- A permit to refuel system will be adopted at the site; and,
- Branches, logs or debris will not be allowed to build up in aquatic zones. All such material will be removed when harvesting operations have been completed, but care will be taken to avoid removing natural debris deflectors.



Table 3-1 Minimum Buffer Zone Widths (Forest Service, 2000)

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

#### 3.2.5.1 Forestry Felling Drainage Management

Before the commencement of any felling works, an Environmental Clerk of Works (ECoW) shall be appointed to oversee the keyhole and extraction works. The ECoW shall be experienced and competent, and shall have the following functions and operate their record using a Schedule of Works Operation Record (SOWOR), as proposed in the planning application:

- > Attend the site for the setup period when drainage protection works are being installed, and be present on site during the remainder of the forestry keyhole felling works.
- Prior to the commencement of works, review and agree the positioning by the Operator of the required Aquatic Buffer Zones (ABZs), silt traps, silt fencing (see below), water crossings and onsite storage facilities for fuel, oil and chemicals (see further below).
- Be responsible for preparing and delivering the Environmental Tool Box Talk (TBT) to all relevant parties involved in site operations, prior to the commencement of the works.
- Conduct daily and weekly inspections of all water protection measures and visually assess their integrity and effectiveness in accordance with Section 3.4 (Monitoring and Recording) and Appendix C (Site Monitoring Form (Visual Inspections)) of the Forestry & Freshwater Pearl Mussel Requirements.
- > Take representative photographs showing the progress of operation onsite, and the integrity and effectiveness of the water protection measures.
- Collect water samples for analysis by a 3rd party accredited laboratory, adhering to the following requirements:
  - Surface water samples shall be collected upstream and downstream of the keyhole felling site at suitable sampling locations.
  - Sampling shall be taken from the stream / river bank, with no in-stream access permitted.
  - The following minimum analytical suite shall be used:
    - pH,
    - Electrical Conductivity,
    - Temperature
    - Total Suspended Solids, Biochemical Oxygen Demand, Total Phosphorus, Ortho-Phosphate, Total Nitrogen, and Ammonia.
- Review of operator's records for plant inspections, evidence of contamination and leaks, and drainage checks made after extreme weather conditions.
- > Prepare and maintain a contingency plan.
- Suspend work where potential risk to water from siltation and pollution is identified, or where operational methods and mitigation measures are not specified or agreed.
- > Prepare and maintain a Water Protection Measure Register. This document is to be updated weekly by the ECoW.



### 3.2.6 Borrow Pit Drainage

While surface water will be contained in the borrow pits area, the design proposal is to control the level of water in the borrow pit area by creating a single point outlet from the basin-like area that will ensure the water does not overtop the pit area. Run-off from the proposed borrow pit area will be controlled via a single outlet that will be installed at the edge of the borrow pit. The single outfall point will be constructed to manage runoff from the borrow pit and its immediate surrounds. Interceptor drains will already have been installed upgradient of the borrow pit area before any extraction begins.

During the construction phase of the project, it will be necessary to keep the borrow pit area free of standing water while rock is still being extracted. This will be achieved by using a mobile pump, which will pump water into the same series of drains, settlement ponds and level spreader, which will receive the water from the single outlet.

### 3.2.7 Peat and Spoil Repository Area Drainage

During the initial placement of peat and subsoil at the repository area, silt fences, straw bales and biodegradable matting will be used to control surface water runoff from the repository area. 'Siltbuster' treatment trains will be employed if previous treatment is not to a high quality.

Drainage from the repository area will ultimately be routed to an oversized swale and a stilling ponds designed for a 24 hour retention time, and for a 1 in 10 year return period, before being discharged to the on-site drains.

The repository area will be sealed with a digger bucket and vegetated as soon possible to reduce sediment entrainment in runoff. Once re-vegetated and stabilised peat/subsoil reinstatement areas will no longer be a potential source of silt laden runoff.

### 3.2.8 Cable Trench Drainage

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

To efficiently control drainage runoff from cable trench works areas, excavated material is stored on the upgradient side of the trench. Should any rainfall cause runoff from the excavated material, the material is contained in the downgradient cable trench. Excess subsoil is removed from the cable trench works area immediately upon excavation, and in the case of the Proposed Development, will be transported to one of the peat repository areas, the on-site borrow pit or used for landscaping and reinstatements of other areas elsewhere on site.

On steeper slopes, silt fences, as detailed in Section 2.5 of the SWMP will be installed temporarily downgradient of the cable trench works area, or on the downhill slope below where excavated material is being temporarily stored to control run-off.

# **3.3 Refuelling, Fuel and Hazardous Materials**

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

- Minimal refuelling or maintenance of construction vehicles or plant will take place on site. Off-site refuelling shall occur at a controlled fuelling station;
- > On-site refuelling will take place using a mobile double skinned fuel bowser. The fuel bowser, a double-axel custom-built refuelling trailer will be re-filled off site or at



the primary construction compound, via a fuel tanker, and will be towed around the site by a 4x4 jeep to where machinery is located. It is not practical for all vehicles to travel back to a single refuelling point, given the size of the cranes, excavators, etc. that will be used during the construction of the wind farm. The 4x4 jeep (and all other plant and vehicles on site) will also carry fuel absorbent material and pads in the event of any accidental spillages. The fuel bowser will be parked on a level area in the construction compound when not in use. Only designated trained and competent operatives, with a permit to refuel, will be authorised to refuel plant on site. Mobile measures such as drip trays and fuel absorbent mates will be used during all refuelling operations.

- Fuels volumes stored on site shall be minimised. The fuel storage areas, within the temporary construction compounds, will be bunded appropriately for the fuel storage volume for the time period of the construction and fitted with a storm drainage system and an appropriate oil interceptor;
- > The electrical substation compound will be bunded appropriately to the volume of oils likely to be stored, and to prevent leakage to groundwater or surface water. The bunded area will be fitted with a storm drainage system and an appropriate oil interceptor;
- > Herbicides, for use in the removal of Rhododendron, will be stored in appropiatley bunded containers at the temporary construction compounds. Further measures are outlined in Section 3.8.1 below.
- > The plant used will be regularly inspected for leaks and fitness for purpose; and,
- > An emergency plan for the construction phase to deal with accidental spillages will be developed (refer to Section 5 of the CEMP). Spill kits will be available to deal with any accidental spillage in and outside the refuelling area.
- > Hazardous wastes that may occur on site during the construction phase of the development may include oil, diesel fuel, chemicals, paints, preservatives etc.
- > All hazardous wastes will be stored in bunded containers/areas before being collected by an authorised waste contractor and brought to an EPA licensed waste facility.
- > Hazardous wastes will be kept separate from non-hazardous wastes so that contamination does not occur.

# 3.4 **Cement Based Products Control Measures**

The following mitigation measures will be implemented to avoid release of cement leachate from the site:

- > No batching of wet-cement products will occur on site;
- > The arrangements for concrete deliveries to the site will be discussed with suppliers before work starts, agreeing routes, prohibiting on-site washout of trucks and discussing emergency procedures.
- Ready-mixed supply of wet concrete products and where possible, emplacement of pre-cast elements, will take place. Where possible pre-cast elements for culverts and concrete works will be used;
- No washing out of any plant used in concrete transport or concreting operations will be allowed on-site;
- Where concrete is delivered on site, only chute cleaning will be permitted, using the smallest volume of water possible to dedicated impermeable concrete washout area which requires monitoring and maintenance. No discharge of cement contaminated waters to the construction phase drainage system or directly to any artificial drain or watercourse will be allowed.
- > Use weather forecasting to plan dry days for pouring concrete (see Section 3.2.4.2.2);
- > The pour site will be free of standing water and plastic covers will be ready in case of sudden rainfall event;



The small volume of water that will be generated from washing of the concrete lorry's chute will be directed into a concrete washout area, built using straw bales and lined with an impermeable membrane. below. The areas are generally covered when not in use to prevent rainwater collecting. In periods of dry weather, the areas can be uncovered to allow much of the water to be lost to evaporation. At the end of the concrete pours, any of the remaining liquid contents is tankered off-site. Any solid contents that will have been cleaned down from the chute will have solidified and can be broken up and disposed of along with other construction waste (refer to Section 3.9 below).

The 50 m wide river buffer zone will be in place for the duration of the construction phase. No construction activity will occur within the buffer zone with the exception of bridge and culvert construction. The buffer zone will:

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





Plate 3-1 Typical concrete chute wash out areas

# 3.5 **Peat Stability Management**

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

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



### **3.5.1** General recommendations for Good Construction

Based on the recommendations and control measures given in the FT Peat Stability Assessment (Appendix 8-1 of the EIAR) report being strictly adhered to during construction and the detailed stability assessment carried out for the peat slopes which showed that the site has an acceptable margin of safety.

The risk assessment at each turbine location identified a number of control measures to further reduce the potential risk of peat failure. Access roads to turbines will be subject to the same relevant control measures that apply to the nearest turbine as detailed in the FT Peat Stability Assessment Report.

The following measures which will be implemented during the construction phase of the project will assist in the management of the risks for this site.

- > Appointment of experienced and competent contractors;
- > The site will be supervised by experienced and qualified personnel;
- > Sufficient time will be allocated for the project (be aware that decreasing the construction time has the potential to increase the risk of initiating a localised peat movement);
- > Undercutting of slopes and unsupported excavations will be prevented.
- > A managed robust drainage system will be maintained.
- > Placement of loads/overburden on marginal ground will be prevented
- > Set up, maintain and report findings from monitoring systems (as outlined in the Geotechnical and Peat Stability Assessment);
- Construction method statements will be developed and agreed before commencement of construction and are followed by the contractor; and,
- > The Construction Risk Register will be revised and amended as construction progresses to ensure that risks are managed and controlled for the duration of construction.
- > The hydrology of area will be maintained as far as possible by maintaining existing drains to water pressures in the peat to avoid peat becoming "boyant"
- > The use of experienced geotechnical staff for site investigations
- > The use of experienced contractors and trained operators will carry out the work.
- > Detailed ground investigation will determine peat, mineral soil and bedrock condition and properties.
- Potential requirement for small buttress on upslope side of access road to retain peat will be used should any instability be noted.

# 3.5.2 Peat and Spoil Usage in Restoration of the Borrow Pits

The general construction methodology for the construction of the borrow pits is outlined in Section 2.4.4 above. This methodology includes procedures that are to be included in the construction to minimise any adverse impact on peat stability.

### 3.5.3 **Peat Placement Areas**

The placement of peat and spoil, excavated during the construction phase of the Proposed Development, as presented in Fehily Timoney's Peat & Spoil Management Plan in Appendix 4-2 of the EIAR, is outlined in Section 2.4.5 above. This methodology includes procedures that are to be included in the construction to minimise any adverse impact on peat stability.

# 3.6 **Dust Control**

Construction dust can be generated from many on-site activities such as excavation and backfilling. The extent of dust generation will depend on the type of activity undertaken, the location, the nature of the



dust, i.e. soil, sand, peat, etc. and the weather. In addition, dust dispersion is influenced by external factors such as wind speed and direction and/or, periods of dry weather. Construction traffic movements also have the potential to generate dust as they travel along the haul route.

Proposed measures to control dust include:

- > Any site roads with the potential to give rise to dust will be regularly watered, as appropriate, during dry and/or windy conditions. Silty or oily water will not be used for dust suppression.
- > Construction traffic will be restricted to defined routes and a speed limit implemented.
- > The designated public roads outside the site and along the main transport routes to the site will be regularly inspected by the ECoW for cleanliness, and cleaned as necessary;
- Material handling systems and material storage areas will be designed and laid out to minimise exposure to wind;
- Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods;
- Water misting or bowsers will operate on-site as required to mitigate dust in dry weather conditions;
- > The transport of soils or other material, which has significant potential to generate dust, will be undertaken in tarpaulin-covered vehicles where necessary;
- > All construction related traffic will have speed restrictions on un-surfaced roads to 15 kph;
- Daily inspection of construction sites to examine dust measures and their effectiveness.
- > When necessary, sections of the haul route will be swept using a truck mounted vacuum sweeper; and,
- > All vehicles leaving the construction areas of the site will pass through a wheel washing area prior to entering the local road network.

# 3.7 Noise Control

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

- Local residents will be kept informed of the proposed working schedule, where appropriate, including the times and duration of any abnormally noisy activity that may cause concern;
- Any extraordinary site work occurring outside of the core working hours (for example, crane operations lifting components onto the tower) will be programmed, when appropriate, so that haulage vehicles would not arrive at or leave the site between 19:00 and 07:00, with the exception of abnormal loads that would be scheduled to avoid anticipated periods of high traffic flows;
- > All vehicles and mechanical plant will be fitted with effective exhaust silencers and be subject to programmed maintenance;
- Inherently quiet plant will be selected where appropriate and available all major compressors would be 'sound reduced' models fitted with properly lined and sealed acoustic covers, which would be kept closed whenever the machines are in use;
- > All ancillary pneumatic percussive tools will be fitted with mufflers or silencers of the type recommended by the manufacturers;
- Machines will be shut down between work periods (or when not in use) or throttled down to a minimum;



- > All equipment used on site will be regularly maintained, including maintenance related to noise emissions;
- > Vehicles will be loaded carefully to ensure minimal drop heights so as to minimise noise during this operation; and
- All ancillary plant such as generators and pumps will be positioned so as to cause minimum noise disturbance and if necessary, temporary acoustic screens or enclosures will be provided.

# **Invasive Species Management**

A baseline invasive species survey was carried out at the site to identify the presence and location of any invasive species (listed under the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011) by a suitably qualified ecologist. As outlined in Chapter 6 of the EIAR, *Rhododendron ponticum* was recorded from various areas within the site.

## 3.8.1 **Removal of Rhododendron**

The following treatment procedures will be adhered to facilitate the removal of Rhododendron on site.

- Previously identified infested areas will be resurveyed prior to the commencement of the treatment procedures. The purpose of this is to identify if the Rhododendron has spread outside of previously mapped areas.
- > Prior to the commencement of treatment, all areas identified for treatment will be marked with barrier tape.
- > All staff will be fully trained and competent in the use of herbicides
- Rhododendron will be cut to a height of between 2 and 4cm above the ground and immediately sprayed with a 20% solution of glyphosate mixed with a dye.
- The application of herbicide will adhere to legislation and best practice protocols on all aspects including: the storage and application of herbicides, PPE, record keeping.
- > All herbicide mixtures will be prepared off-site or in a designated area on the forest road network.
- Alternatively eco- plugs may be used. <u>https://www.forestresearch.gov.uk/research/the-use-of-ecoplugs-for-woody-weed-control/</u>
- Treated area will be monitored annually for three years, following the initial treatment. Further cutting and herbicide treatment will be carried out if required.

## 3.8.2 Other Invasive Species

No additional species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011 were recorded during the survey. No aquatic invasive species were recorded and no works on or in watercourses are proposed as part of the Croagh Wind Farm development.

In the event that the presence of other such species is found at or adjacent to the development footprint during pre-commencement surveys, particularly in areas where its excavation may be required, an invasive species management plan will be prepared for the site to prevent the introduction or spread of any invasive species within the footprint of the works. An invasive species management plan, if required, will set out best practice control methods as summarised in the following sections.



### 3.8.3 Site Management

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

## 3.8.4 Establish Good Site Hygiene

The following measures are proposed to establish good site hygiene to ensure the control of any potential spread of invasive species during construction works:

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

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

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

# 3.9 Waste Management

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



## 3.9.1 Legislation

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

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

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

# 3.9.2 Waste Management Hierarchy

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

#### Prevention and Minimisation:

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

#### Reuse of Waste:

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

#### Recycling of Waste:

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

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

### 3.9.3 **Construction Phase Waste Management**

#### 3.9.3.1 **Description of the Works**

The construction of the development will involve the construction of 21 no. turbines, new and upgrade of site access roads, internal cabling and the underground cable route, substation, control buildings and all associated infrastructure.

The turbines will be manufactured off site and delivered to site where on site erection will occur.



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

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

The site roads will be constructed with rock won from on-site borrow pits

The waste types arising from the construction phase of the development are outlined in Table 3-2 below.

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

Table 3-2 Expected waste types arising during the Construction Phase

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

# 3.9.3.2 Waste Arising and Proposals for Minimisation, Refuse and Recycling of Construction Waste

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

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



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

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

### 3.9.3.3 Waste Arising from Construction Activities

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

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

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

It is not envisaged that there will be any waste material arising from the materials used to construct the site roads as only the quantity of stone necessary will be sourced from local quarries and brought on site on an 'as needed' basis.

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

# 3.9.4 Waste Arising from Decommissioning

The design life of the proposed renewable energy development is 35 years after which time a decision will be made to determine whether or not the turbines will be replaced by new turbines or if decommissioning will occur. The lengthy time frame between the completion of the construction phase and decommissioning will result in the only materials remaining on site at that time will be infrastructural material such as the turbine foundations, turbines and the granular material used to construct roads. When the site is decommissioned, cranes will disassemble each turbine tower and all equipment. The associated components will be removed from site for re-use, recycling or waste disposal. Any structural elements that are not suitable for recycling will be disposed of in an appropriate manner. All lubrication fluids will be drained down and put aside for appropriate collection, storage, transport and disposal. Any materials which cannot be re-used or recycled will be disposed of by an appropriately licenced contractor.

The waste types arising from the decommissioning of the development are outlined in Table 3-3 below.



Table 3-3 Expected waste types arising during the Decommissioning Phase

Material Type	Example	EWC Code
Cables	Electrical wiring	17 04 11
	Copper, aluminium, lead, iron	
Metals	and rebar	17 04 07
Inert materials	Crushed stone, concrete	17 01 07

#### 3.9.4.1 **Reuse**

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

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

#### 3.9.4.2 **Recycling**

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

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

### 3.9.5 **Implementation**

#### 3.9.5.1 Roles and Responsibilities

Prior to the commencement of the development a Construction Waste Manager will be appointed by the Contractor. The Construction Waste Manager will be in charge of the implementation of the objectives of the plan, ensuring that all hired waste contractors have the necessary authorisations and that the waste management hierarchy is adhered to. The person nominated must have sufficient authority so that they can ensure everyone working on the development adheres to the management plan.

#### 3.9.5.2 Training

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

- > Distinguish reusable materials from those suitable for recycling;
- > Ensure maximum segregation at source;
- > Co-operate with site manager on the best locations for stockpiling reusable materials;
- > Separate materials for recovery; and



> Identify and liaise with waste contractors and waste facility operators.

#### 3.9.5.2.1 Record Keeping

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

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

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

### 3.9.5.3 Waste Management Plan Conclusion

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



# 4. ENVIRONMENTAL MANAGEMENT IMPLEMENTATION

# 4.1 **Roles and Responsibilities**

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

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

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

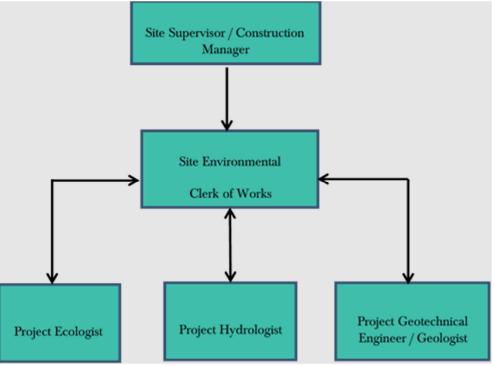


Figure 4-1 Site Management Chain of Command

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

# 4.1.1 Construction Manager / Site Supervisor

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



- > Ensure that all works are completed safely and with minimal environmental risk;
- Approve and implement the Project CEMP and supporting environmental documentation, and ensure that all environmental standards are achieved during the construction phase of the project;
- > Take advice from the Environmental Clerk of Works on legislation, codes of practice, guidance notes and good environmental working practice relevant to their work;
- > Ensure compliance through audits and management site visits;
- > Ensure timely notification of environmental incidents; and,
- > Ensure that all construction activities are planned and performed such that minimal risk to the environment is introduced.

Ensure that all construction activities are planned and performed such that minimal risk to the environment is introduced.

# 4.1.2 **Environmental Clerk of Works**

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

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

- > Preparation and update of the CEMP as required, and supporting environmental documentation and review/approval of contractor method statements;
- > Undertake inspections and reviews to ensure the works are carried out in compliance with the CEMP;
- > Monitor the implementation of the CEMP, particularly all proposed/required Environmental Monitoring;
- Generate environmental reports as required to show environmental data trends and incidents and ensure environmental records are maintained throughout the construction period;
- > Advise site management/contractor/sub-contractors on:
  - Prevention of environmental pollution and improvement to existing working methods;
  - Changes in legislation and legal requirements affecting the environment;
  - Suitability and use of plant, equipment and materials to prevent pollution;
  - Environmentally sound methods of working and systems to identify environmental hazards;
- > Ensure the specified mitigation measures are initiated and adhered to during the construction phase;
- Liaise with Project Ecologist, Project Hydrologist, Project Geotechnical Engineer and any other members of the project team to ensure regular site visits and audits/inspections are completed;
- > Ensure adequate arrangements are in place for site personnel to identify potential environmental incidents;
- Ensure that details of environmental incidents are communicated in a timely manner to the relevant regulatory authorities, initially by phone and followed up as soon as is practicable by e-mail;



- > Support the investigation of incidents of significant, potential or actual environmental damage, and ensure corrective actions are carried out, recommend means to prevent recurrence and communicate incident findings to relevant parties; and,
- > Identify environmental training requirements and arrange relevant training for all levels of site based staff/workers.

The level, detail and frequency of reporting expected from the ECoW for the Construction Manager, developer's project manager, and any Authorities or other Agencies, will be agreed by all parties prior to commencement of construction, and may be further adjusted as required during the course of the project.

# 4.1.3 **Project Ecologist**

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

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

- Review and input to the final construction phase CEMP in respect of ecological matters;
- In liaison with Environmental Clerk of Works, oversee and provide advice on all relevant ecology mitigation measures set out in the EIAR and planning permission conditions;
- Regular inspection and monitoring of the development, through all phases of construction/operation and provide ecological advice as required;
- Carry out ecological monitoring and survey work as may be required by the planning authority.

Carry out ecological monitoring and survey work as may be required by the planning authority.

# 4.1.4 **Project Hydrologist**

The Project Hydrologist will report to the ECoW and is responsible for inspection and review of drainage and water quality aspects associated with construction of the proposed renewable energy development. The Project Hydrologist will not be full time on site but will visit the site at least once a month during construction and on a weekly basis during site preparation/groundworks.

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

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



# 4.1.5 **Project Geotechnical Engineer/Geologist**

The Geotechnical Engineer or Project Geologist will report to the ECoW and is responsible for inspection and review of geotechnical aspects associated with construction of the proposed renewable energy development. The Geotechnical Engineer will not be full time on site but will visit site at least once a month during the construction phase and on a weekly basis during site preparation/groundworks.

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

- Visit site regularly, or at least once a month during the construction phase, to complete geotechnical audits and reviews and report any issues to the Site Supervisor/Construction Manager;
- > Ensuring that identified hazards are listed in the Construction Risk Register and that these are subject to ongoing monitoring; and,
- Ongoing inspection and monitoring of the development, particularly in areas of peatland and the temporary stockpile areas, through all phases of construction (including pre, during and post construction) and ensure construction is carried out as specified in the EIAR, NIS and in relevant planning conditions.

# 4.2 Water Quality and Monitoring

The methodology for water quality monitoring before, during and after the construction phase of the Proposed Development is outlined in detail in Section 4 of the Surface Water Management Plan (SWMP) which is included as Appendix 4-4 of the EIAR.

This document includes details in relation to baseline monitoring, daily visual inspections, continuous monitoring, monthly laboratory analysis, field monitoring and reporting.



# 5. **EMERGENCY RESPONSE PLAN**

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

## 5.1 **Overview**

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

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

# 5.1.1 Roles and Responsibilities

The chain of command during an emergency response sets out who is responsible for coordinating the response. The Site Supervisor/Construction Manager will lead the emergency response which makes him responsible for activating and coordinating the emergency response procedure. The other site personnel who can be identified at this time who will be delegated responsibilities during the emergency response are presented in Figure 5-1. In a situation where the Site Supervisor/ Construction Manager is unavailable or incapable of coordinating the emergency response, the responsibility will be transferred to the next person in the chain of command outlined in Figure 5-1. This will be updated throughout the various stages of the project.

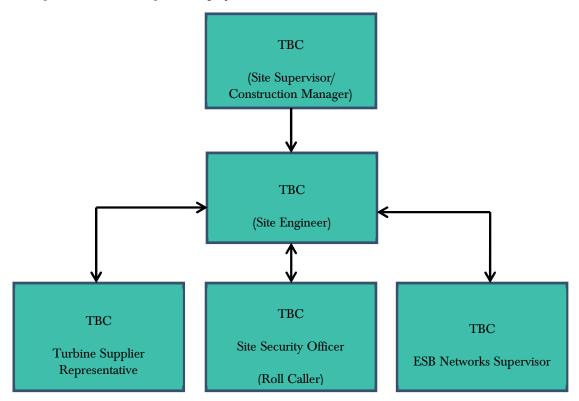


Figure 5-1 Emergency Response Procedure Chain of Command



## 5.1.2 Hazard Identification

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

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

Table 5-1 Hazards associated with potential emergency situations

In the event of an emergency situation associated with, but not restricted to, the hazards outlined in Table 5-1 the Site Supervisor/Construction Manager will carry out the following:

- > Establish the scale of the emergency situation and identify the number of personnel, if any, have been injured or are at risk of injury.
- Where necessary, sound the emergency siren/fog-horn that activates an emergency evacuation on the site. The Site Supervisor/Construction Manager must proceed to the assembly point if the emergency poses any significant threat to their welfare <u>and if</u> there are no injured personnel at the scene that require assistance. The Site Supervisor/Construction Manager will be required to use their own discretion at that point. In the case of fire, the emergency evacuation of the site should proceed, without exception. The site evacuation procedure is outlined in Section 5.1.3.
- > Make safe the area if possible and ensure that there is no identifiable risk exists with regard to dealing with the situation e.g. if a machine has turned over, ensure that it is in a safe position so as not to endanger others before assisting the injured.
- Contact the required emergency services or delegate the task to someone. If delegating the task, ensure that the procedures for contacting the emergency services as set out in Section 5.3 is followed.
- > Take any further steps that are deemed necessary to make safe or contain the emergency incident e.g. cordon off an area where an incident associated with electrical issues has occurred.
- Contact any regulatory body or service provider as required e.g. ESB Networks the numbers for which as provided in Section 5.4.
- > Contact the next of kin of any injured personnel where appropriate.



### 5.1.3 Site Evacuation/Fire Drill

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

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

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

# 5.2 Environmental Emergency Response Procedure

## 5.2.1 **Excessive Peat Movement**

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

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

# 5.2.2 **Onset of Peat Slide**

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

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



and stabilisation procedures implemented. The area will be monitored, as appropriate, until such time as movements have ceased.

### 5.2.3 Spill Control Measures

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

- > The source of the spill will be stopped, and the alarm will be raised to alert people working in the vicinity of any potential dangers.
- > If applicable, any sources of ignition will be eliminated in the immediate vicinity of the incident.
- > The spill will be contained using the spill control materials, track mats or other material as required. Do not spread or flush away the spill.
- > If possible, any vulnerable areas will be covered or bunded off where appropriate such as drains, watercourses or sensitive habitats.
- > If possible, clean up as much as possible using the spill control materials.
- Any used spill control material will be contained and disposed of appropriately using a fully licensed waste contractor with the appropriate permits so that further contamination is limited.
- > The ECoW will be notified immediately giving information on the location, type, and extent of the spill so that they can take appropriate action.
- > The ECoW will inspect the site and ensure the necessary measures are in place to contain and clean up the spill and prevent further spillage from occurring.
- > The ECoW will notify the appropriate regulatory body such as Mayo County Council, and the Environmental Protection Agency (EPA), if deemed necessary.

The importance of a swift and effective response in the event of such an incident occurring cannot be over emphasised. Environmental incidents are not limited to just fuel spillages. Therefore, any environmental incident will be investigated in accordance with the following steps.

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

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



# 5.3 **Contact the Emergency Services**

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

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

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

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

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

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

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

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

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

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

# 5.4 **Contact Details**

A list of emergency contacts is presented in Table 5-2. A copy of these contacts will be included in the Site Safety Manual and in the site offices and the various site welfare facilities.

Contact	Telephone no.
Emergency Services – Ambulance, Fire, Gardaí	999/112
Doctor – Bangor Erris Health Centre	(097) 83464
Hospital – Mayo General Hospital	(094) 902 1733
ESB Emergency Services	1850 372 999

Table 5-2 Emergency Contacts



Contact	Telephone no.
Gas Networks Ireland Emergency	1850 20 50 50
Gardaí – Crossmolina Garda Station.	096 31371
Health and Safety Co-ordinator - Health & Safety Services	TBC
Health and Safety Authority	1890 289 389
Inland Fisheries Ireland (IFI)	1890 347 424
Project Supervisor Construction Stage (PSCS): TBC	TBC
Project Supervisor Design Stage (PSDS): TBC	TBC
SSE Renewables Sheskin South Desiganted Acvitiy Company (DAC)	TBC

# 5.4.1 **Procedure for Personal Tracking**

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

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

# 5.5 Induction Checklist

Table 5-3 provides a list of items highlighted in this ERP which must be included or obtained during the mandatory site induction of all personnel that will work on the site. This will be updated throughout the various stages of the project.

Table 5-3 Emergency Response Plan Items Applicable to the Site Induction Process

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



# 6. **MITIGATION MEASURES**

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

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

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



Ref. No.	Preparation and Mitigation Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			EIAR Chapter 4 – Description of the Proposed Development		-
			Pre-Commencement Phase		
MM1	Environmental Management	EIAR Section 4	All proposed site activities will be provided for in a Construction Environmental Management Plan (CEMP), prepared prior to the commencement of any operations onsite. The CEMP will set out all measures necessary to ensure works are carried out in accordance with the mitigation measures set out in the EIAR and will set out the monitoring and inspections procedures and frequencies.		
MM2	Environmental Management	EIAR Section 4	The ECoW will maintain responsibility for monitoring the construction works and audit the implementation of the CEMP. In addition, a Project Ecologist, Project Hydrologist, Project Archaeologist, Project Geotechnical Engineer will visit the site regularly and report to the ECoW.		
MM3	Environmental Management	CEMP Section 4	A Site ECoW will oversee the site works and implementation of the Construction Environmental Management Plan (CEMP), and provide on-site advice on the mitigation measures necessary as necessary to ensure the project proceeds as intended. The level, detail and frequency of reporting expected from the ECoW for the Construction Manager, developer's project manager, and any Authorities or other Agencies, will be agreed by parties where required prior to commencement of construction, and may be further adjusted as required during the course of the project.		
MM4	Surface Water Quality	CEMP Section 4	Baseline water quality field testing and laboratory analysis will be undertaken where required prior to commencement of felling and construction at the site. The baseline monitoring programme will be subject to agreement with Donegal County Council.		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			Baseline laboratory analysis of a range of parameters with relevant regulatory limits and Environmental Quality Standards (EQSs) will also be undertaken as per water monitoring programme for the Proposed Development and each primary watercourse along the route.		
MM5	Concrete Deliveries	EIAR Section 4 CEMP Section 3	The arrangements for concrete deliveries to the site will be discussed with suppliers before work starts, agreeing routes, prohibiting on-site washout of trucks and discussing emergency procedures.		
MM6	Site Drainage Plan	EIAR Section 4 CEMP Section 4	The Project Hydrologist will prepare detailed drainage design before construction commences.		
MM7	Preparative Site Drainage Management,	EIAR Section 4 CEMP Section 4	The detailed drainage design will specify all materials and equipment necessary to implement the drainage measures effectively, which will be brought on site in advance of any works commencing. An adequate quantity of straw bales, clean stone, terram, stakes, etc. will be kept on site at all times to implement the detailed drainage design measures as necessary. The detailed drainage measures will be installed prior to, or at the same time as the works they are intended to drain.		
MM8	Drainage Inspection	CEMP Section 3	Prior to commencement of works in sub-catchments across the site, main drain inspections will be completed to ensure ditches and streams are free from debris and blockages that may impede drainage.		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
MM9	Drainage Maintenance	EIAR Section 4 CEMP Section 4	An inspection and maintenance plan for the drainage system on site will be prepared in advance of commencement of any works. Regular inspections of all installed drainage systems will be necessary, especially after heavy rainfall, to check for blockages, and ensure there is no build-up of standing water at parts of the systems where it is not intended. The inspection of the drainage system will be the responsibility of the site ECoW or the Project Hydrologist.		
MM10	Earthworks	CEMP Section 3	Drainage and associated pollution control measures will be implemented onsite before the main construction works commence. Where possible, drainage controls will be installed during seasonally dry ground conditions. This will reduce the possibility of impact on surface waters by suspended sediment released during construction and entrained in surface run-off.		
MM11	Felling	EIAR Section 4, 7	Construction will not commence during the Breeding Bird season from March to August inclusive. If breeding activity is identified, the nest site will be located, and no works shall be undertaken within a 500m buffer (Forestry Commission Scotland 2006; Ruddock & Whitfield 2007). No works shall be permitted within the buffer until it can be demonstrated that the nest is no longer occupied.		
MM12	Felling Licence	EIAR Section 4	Felling will be carried out under the terms of a licence application to the Forest Service, as per the Forest Service's policy on granting felling licenses for wind farm developments.		
MM13	Peat Management	EIAR Section 4 CEMP Section 4	<ul> <li>Prior to commencing the construction of the excavated roads movement monitoring posts will be installed in areas where the peat depth is greater than 1.5m.</li> <li>Interceptor drains will be installed upslope of the access road alignment to divert any surface water away from the construction area.</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required			
	Construction Phase							
MM14	Wastewater Management	EIAR Section 4 CEMP Section 2	The proposed wastewater storage tank will be fitted with an automated alarm system that will provide sufficient notice that the tank requires emptying. Full details of the proposed tank alarm system can be submitted to the Planning Authority in advance of any works commencing on-site. The wastewater storage tank alarm will be part of a continuous stream of data from the site's turbines, wind measurement devices and electricity substation that will be monitored remotely 24 hours a day, 7 days per week. Only waste collectors holding valid waste collection permits under the Waste Management (Collection Permit) Regulations, 2007(as amended), will be					
			employed to transport wastewater away from the site.					
			<ul> <li>On-site refuelling will be carried out using a mobile double skinned, bunded</li> </ul>					
MM15	Refuelling	EIAR Section 4	fuel bowser. The fuel bowser, a double-axel custom-built refuelling trailer will be re-filled off site and will be towed around the site by a 4x4 jeep to where machinery is located. It is not practical for all vehicles to travel back to a single					
		CEMP Section 3	refuelling point, given the size of the cranes, excavators, etc. that will be used during the construction of the Proposed Development. The 4x4 jeep will also carry fuel absorbent material and pads in the event of any accidental spillages. The fuel bowser will be parked on a level area in the construction when not in use. Refuelling operations will be carried out only by designated trained and competent operatives. Mobile anti-pollution measures such as drip trays and fuel absorbent mats will be used during all refuelling operations.					
			<ul> <li>Fuels stored on site will be minimised. Storage areas where required will be bunded appropriately for the fuel storage volume for the time period of the construction and fitted with a storm drainage system and an appropriate oil interceptor;</li> <li>The plant used during construction will be regularly inspected for leaks and fitness for purpose;</li> </ul>					



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			An emergency plan for the construction phase to deal with accidental spillages is contained within section 5 of the CEMP. Spill kits will be available to deal with and accidental spillage in and outside the re-fuelling area.		
<b>MM</b> 16	Plant and Equipment Inspections	CEMP Section 3	A programme for the regular inspection of plant and equipment for leaks and fitness for purpose will be developed at the outset of the construction phase.		
MM17	Concrete Deliveries and Management	EIAR Section 4 CEMP Section 3	<ul> <li>The following mitigation measures will be implemented to avoid release of cement leachate from the site: <ul> <li>No batching of wet-cement products will occur on site;</li> <li>The arrangements for concrete deliveries to the site will be discussed with suppliers before work starts, agreeing routes, prohibiting on-site washout of trucks and discussing emergency procedures.</li> <li>Ready-mixed supply of wet concrete products and where possible, emplacement of pre-cast elements, will take place. Where possible pre-cast elements for culverts and concrete works will be used;</li> <li>No washing out of any plant used in concrete transport or concreting operations will be allowed on-site;</li> <li>Where concrete is delivered on site, only chute cleaning will be permitted, using the smallest volume of water possible to dedicated impermeable concrete washout area which requires monitoring and maintenance. No discharge of cement contaminated waters to the construction phase drainage system or directly to any artificial drain or watercourse will be allowed.</li> <li>Use weather forecasting to plan dry days for pouring concrete (see Section 3.2.4.2.2);</li> </ul> </li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>The pour site will be free of standing water and plastic covers will be ready in case of sudden rainfall event;</li> </ul>		
			The small volume of water that will be generated from washing of the concrete lorry's chute will be directed into a concrete washout area, built using straw bales and lined with an impermeable membrane. below. The areas are generally covered when not in use to prevent rainwater collecting. In periods of dry weather, the areas can be uncovered to allow much of the water to be lost to evaporation. At the end of the concrete pours, any of the remaining liquid contents is tankered off-site. Any solid contents that will have been cleaned down from the chute will have solidified and can be broken up and disposed of along with other construction waste		
MM18	Road Cleanliness	EIAR Section 4.	A road sweeper will be available if any section of the public roads were to be dirtied by trucks associated with the Proposed Development.		
		CEMP Section 3			
MM19	Watercourse Buffers	EIAR Section 4. CEMP Section 3	All discharges from the proposed works areas will be made over vegetation filters at an appropriate distance from natural watercourses.		
MM20	Water Discharge	EIAR Section 4	There will be no direct discharges to any natural watercourses, with all drainage waters being dispersed as overland flows.		
MM21	Wastewater Management	EIAR Section 4.	During the construction phase, a self-contained port-a-loo with an integrated waste holding tank will be used on site for toilet facilities. This will be maintained by the service contractor as required and will be removed from the site on completion of the construction phase.		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
		CEMP Section			
MM22	Drainage Swales	EIAR Section 4	Swales will be used to intercept and collect run off from construction areas of the site during the construction phase, and channel it to settlement ponds for sediment attenuation as per the drainage design.		
		CEMP Section 3			
MM23	Interceptor Drains	EIAR Section 4	Interceptor drains will be installed up-gradient of any works areas to collect surface flow runoff and prevent it reaching excavations and construction areas of the site. It will then be directed to areas where it can be re-distributed over the ground as sheet flow as per the drainage design.		
		CEMP Section 3			
MM24	Check Dams	EIAR Section 4	Check dams will not be used in any natural watercourses, only artificial drainage channels and interceptor drains. The check dams will be installed at regular intervals along interceptor drains to restrict flow velocity, minimise channel erosion and promote sedimentation behind the dam as per the drainage design.		
		CEMP Section 3			
MM25	Level Spreaders,	EIAR Section 4	A level spreader will be constructed at the end of each interceptor drain to convert concentrated flows in the drain into diffuse sheet flow on areas of vegetated ground. The levels spreaders will be located downgradient of any proposed works areas in locations where they are not likely to contribute further to water ingress to		
		CEMP Section 3	construction areas of the site.		
<b>MM</b> 26	Piped Slope Drains	EIAR Section	Piped slope drains will be used to transfer water away from areas where slopes are too steep to use level spreaders and will only remain in place for the duration of the construction phase.		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
MM27	Vegetation Filters	EIAR Section 4	Vegetation filters, that is areas of existing vegetation, accepting drainage water issuing from level spreaders as sheet flow, will remove any suspended sediment from water channelled via interceptor drains or any remaining sediment in waters channelled via swales and settlement ponds.		
MM28	Settlement Ponds	EIAR Section 4 CEMP Section 3	Settlement ponds, placed either singly or a pair in series, will buffer volumes of run- off discharging from the drainage system during periods of high rainfall, by retaining water until the storm hydrograph has receded, thus reducing the hydraulic loading to water courses as per the drainage design.		
MM29	Dewatering Silt Bag	EIAR Section 4 CEMP Section 3	Silt bags will be used where small to medium volumes of water need to be pumped from excavations. As water is pumped through the bag, the majority of the sediment is retained by the geotextile fabric allowing filtered water to pass through. Silt bags will be used with natural vegetation filters or sedimats - Sediment entrapment mats, consisting of coir or jute matting - will be placed at the silt bag location to provide further treatment of the water outfall from the silt bag. Sedimats will be secured to the ground surface using stakes/pegs. The sedimat will extend to the full width of the outfall to ensure all water passes through this additional treatment measure.		
MM30	Siltbuster	EIAR Section 4	A "siltbuster" or similar equivalent piece of equipment will be available to filter any water pumped out of excavation areas if necessary, prior to its discharge to stilling ponds or swales. Siltbusters are mobile silt traps that can remove fine particles from water using a proven technology and hydraulic design in a rugged unit.		
MM31	Culvert Upgrades	EIAR Section 4	<ul> <li>The following mitigation is proposed for completion of wind farm culvert upgrades:</li> <li>Where possible pre-cast elements for culverts and concrete works will be used;</li> <li>All new proposed culverts and proposed culvert upgrades will be suitably sized for the expected peak flows in the watercourse;</li> <li>In all cases, culverts will be oversized to allow mammals to pass through the culvert.</li> </ul>		



Ref. No.	Reference	Reference	Mitigation Measure	Audit	Action Required
	Heading	Location		Result	
	Heading		<ul> <li>Culverts will be installed with a minimum internal gradient of 1% (1 in 100). Smaller culverts will have a smooth internal surface. Larger culverts may have corrugated surfaces which will trap silt and contribute to the stream ecosystem. Depending on the management of water on the downstream side of the culvert, large stone may be used to interrupt the flow of water.</li> <li>All culverts will be inspected regularly to ensure they are not blocked by debris, vegetation or any other material that may impede conveyance</li> <li>All proposed new stream crossings will be bottomless or clear span culverts and the existing banks will remain undisturbed. No in-stream excavation works are proposed and therefore there will be no direct impact on the stream at the proposed crossing location;</li> <li>Where the proposed underground cabling route follows an existing road or road proposed for upgrade, the cable will pass over or below the culvert within the access road;</li> <li>All guidance / mitigation measures proposed by the OPW or the Inland Fisheries Ireland is incorporated into the design of the proposed crossing;</li> <li>As a further precaution, near stream construction work, will only be carried out during the period permitted by Inland Fisheries Ireland for in-stream works according to the Eastern Regional Fisheries Ideal during Construction and Development Works at River Sites", i.e., May to September inclusive. This time period coincides with the period of lowest expected rainfall, and therefore minimum runoff rates. This will minimise the risk of entrainment of suspended sediment in surface water runoff, and transport via this pathway to surface watercourses (any deviation from this will be done in discussion with the IFI);</li> <li>During the near stream construction work double row silt fences will be emplaced immediately down-gradient of the construction area for the duration of the construction phase. There will be no batching or storage of cement allowed in the vicinity</li></ul>	Result	



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			All new river/stream crossings will require a Section 50 application (Arterial Drainage Act, 1945). The river/stream crossings will be designed in accordance with OPW guidelines/requirements on applying for a Section 50 consent.		
MM32	Silt Fences	EIAR Section 4	<ul> <li>Silt fences will be emplaced within drains down-gradient of all construction areas.</li> <li>They will remain in place throughout the entire construction phase.</li> <li>Silt fences will be installed as single, double or a series of triple silt fences, depending on the space available and the anticipated sediment loading.</li> <li>The silt fence designs follow the technical guidance document 'Control of Water Pollution from Linear Construction Projects' published by CIRIA (Ciria, No. C648, 1996). Up to three silt fences may be deployed in series.</li> <li>All silt fencing will be formed using Terrastop Premium or equivalent silt fence product.</li> <li>Silt fences will be inspected regularly to ensure water is continuing to flow through the fabric, and the fence is not coming under strain from water backing up behind it</li> </ul>		
<b>MM</b> 33	Sedimats	EIAR Section 4	Sedimats will be secured to the ground surface using stakes/pegs. The sedimat will extend to the full width of the outfall to ensure all water passes through this additional treatment measure		
MM34	Hydrocarbon Interceptors	EIAR Section 4	A suitably sized hydrocarbon interceptor will be installed wherever it is intended to store hydrocarbons and oils (i.e construction compounds and substation compound) or where it is proposed to park vehicles during the construction and operational phases of the proposed development (i.e construction compounds, substation compound and visitor car park).		
MM35	Excavation seepages and treatment	EIAR Section 4,	<ul> <li>Appropriate interceptor drainage, to prevent upslope surface runoff from entering excavations will be put in place;</li> <li>If required, pumping of excavation inflows will prevent build-up of water in the excavation;</li> <li>The interceptor drainage will be discharged to the site constructed drainage system or onto natural vegetated surfaces and not directly to surface waters;</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>The pumped water volumes will be discharged via volume and sediment attenuation ponds adjacent to excavation areas, along with use of more specialist treatment systems such as a Siltbags;</li> <li>There will be no direct discharge to surface watercourses, and therefore no risk of hydraulic loading or contamination will occur;</li> <li>Silt traps will be placed in the existing drains upstream of any streams where construction works / tree felling is taking place, and these will be diverted into proposed interceptor drains, or culverted under/across the works area;</li> <li>Runoff from individual turbine hardstanding areas will be not discharged into the existing drain network but discharged locally at each turbine location through stilling ponds and buffered outfalls onto vegetated surfaces;</li> <li>Buffered outfalls which will be numerous over the site will promote percolation of drainage waters across vegetation and close to the point at which the additional runoff is generated, rather than direct discharge to the existing drains of the site; and,</li> <li>Drains running parallel to the existing roads requiring widening will be upgraded, widening will be targeted to the opposite side of the road. Velocity and silt control measures such as check dams, sand bags, oyster bags, straw bales, flow limiters, weirs, baffles, silt fences will be used during the upgrade construction works.</li> </ul>		
MM36	Peat Management	EIAR Section 4 CEMP Section	<ul> <li>Excavation will take place to a competent stratum beneath the peat.</li> <li>Road construction will be carried out in sections of approximately 50m lengths i.e., no more than 50m of access road about he suggested without re-placement with store fill</li> </ul>		
		4	<ul> <li>should be excavated without re-placement with stone fill.</li> <li>Once excavated, peat will be placed within the borrow pit or the peat and spoil repository.</li> <li>Excavation of materials with respect to control of peat stability. <ul> <li>Acrotelm (top about 0.3 to 0.4m of peat) is generally required for landscaping and will be stripped and</li> </ul> </li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>temporarily stockpiled for re-use as required. Acrotelm stripping will be undertaken prior to main excavations.</li> <li>Where possible, the acrotelm will be placed with the vegetation part of the sod facing the right way up to encourage growth of plants and vegetation.</li> <li>All catotelm peat (peat below about 0.3 to 0.4m depth) will be transported immediately on excavation to the borrow pit or to the designated peat repository.</li> <li>Side slopes in peat will be not greater than 1 (v): 3 (h). This slope inclination will be reviewed during construction, as appropriate. Where areas of weaker peat are encountered then slacker slopes will be required. Battering of the side slopes of the excavations will be carried out as the excavation progresses.</li> <li>The excavated access road will be constructed of up to 1000mm of selected granular fill. Granular fill to be placed and compacted in layers in accordance with the TII Specification for Road Works.</li> <li>A layer of geogrid/geotextile may be required at the surface of the competent stratum should excessive rutting be noted in the track.</li> <li>At transitions between floating and excavated roads a length of road of about 10 to 20m will have all peat excavated and replaced with suitable fill. The surface of this fill will be graded so that the road surface transitions smoothly from floating to excavated road.</li> <li>Where slopes of greater than 5 degrees are encountered along with relatively deep peat (i.e., greater than 1.5m) and where it is proposed to construct the access road perpendicular to the slope contour sit is best practice to start construction at the bottom of the slope and work towards the top, where possible. This method</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>avoids any unnecessary loading to the adjacent peat and greatly reduces any risk of peat instability.</li> <li>A final surface layer will be placed over the excavated road and will be graded to accommodate wind turbine construction and delivery traffic.</li> </ul>		
MM37	Peat and Spoil Placement Areas	EIAR Section 4. CEMP Section 3	<ul> <li>The following measures which will be implemented during the construction phase of the project will assist in the management of the risks for this site.</li> <li>Appointment of experienced and competent contractors;</li> <li>The site will be supervised by experienced and qualified personnel;</li> <li>Sufficient time will be allocated for the project (be aware that decreasing the construction time has the potential to increase the risk of initiating a localised peat movement);</li> <li>Undercutting of slopes and unsupported excavations will be prevented.</li> <li>A managed robust drainage system will be maintained.</li> <li>Placement of loads/overburden on marginal ground will be prevented</li> <li>Set up, maintain and report findings from monitoring systems (as outlined in the Geotechnical and Peat Stability Assessment);</li> <li>Construction method statements will be developed and agreed before commencement of construction and are followed by the contractor; and,</li> <li>The Construction Risk Register will be revised and amended as construction progresses to ensure that risks are managed and controlled for the duration of construction.</li> <li>The hydrology of area will be maintained as far as possible by maintaining existing drains to water pressures in the peat to avoid peat becoming "boyant"</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>The use of experienced contractors and trained operators will carry out the work.</li> <li>Detailed ground investigation will determine peat, mineral soil and bedrock condition and properties.</li> <li>Potential requirement for small buttress on upslope side of access road to retain peat will be used should any instability be noted.</li> </ul>		
			Operational Phase		
MM38	Wastewater Management	EIAR Section 4	The removal and disposal of wastewater from the site will be carried out by a fully permitted waste collector holding valid Waste Collection Permits as issued under the Waste Management (Collection Permit) Regulations, 2007.		
MM39	Electrical Substation	EIAR Section 4, CEMP Section	The electrical substation will be bunded appropriately to the volume of oils likely to be stored, and to prevent leakage of any associated chemicals and to groundwater or surface water. The bunded area will be fitted with a storm drainage system and an appropriate oil interceptor.		
			Decommissioning Phase		
MM40	Decommissioning	EIAR Chapter 4	Prior to the end of the operational period the Decommissioning Plan (Appendix 4-6 of the EIAR) will be updated in line with decommissioning methodologies that may exist at the time and will agreed with the competent authority at that time.		
MM41	Decommissioning	EIAR Chapter 4	On removal of turbines, the covering of the foundation will be completed using locally sourced material imported to site as the required quantity of material does not currently exist at the site. The imported soil will be spread and graded over the		



Ref. No.	Reference	Reference	Mitigation Measure	Audit	Action Required
	Heading	Location		Result	
			foundation using a tracked excavator and revegetation enhanced by spreading of		
		DP Section 2	an appropriate seed mix to assist in revegetation.		
MM42	Decommissioning	EIAR Chapter 4 DP Section 3	<ul> <li>The following mitigation measures are proposed to avoid release of hydrocarbons at the site:</li> <li>Road-going vehicles will be refuelled off site wherever possible;</li> <li>On-site refuelling will be carried out at designated refuelling areas at various locations throughout the site. Machinery will be refuelled directly by a fuel truck that will come to site as required</li> <li>Only designated trained and competent operatives will be authorised to refuel plant on site.</li> <li>Fuel volumes stored on site should be minimised. Any fuel storage areas will be bunded appropriately;</li> <li>The plant used will be regularly inspected for leaks and fitness for purpose; and,</li> <li>An emergency plan for the decommissioning phase to deal with accidental spillages will be developed (refer to EIAR Section 4). Spill kits will be available to deal with and accidental spillage in and outside the refuelling area.</li> </ul>		
MM43	Decommissioning	EIAR Chapter 4	Upon completion of the Proposed Development the temporary construction compound will be decommissioned by backfilling the area with the material arising during excavation, landscaping with topsoil as required.		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required					
	Chapter 5: Human Beings									
			Pre-Commencement Phase							
MM44	Human Health	EIAR Section 5	Prior to commencement of any works, the occupants of dwellings in the vicinity of the proposed works will be contacted and the scheduling of works will be identified in line with the engagement plan. Local access to properties will also be maintained throughout any construction works and local residents will also be supplied with the number of the works supervisor in order to ensure that disruption will be kept to a minimum.							
			Construction Phase							
MM45	Human Health	EIAR Section 5	<ul> <li>The Proposed Development will be constructed, operated and decommissioned in accordance with all relevant Health and Safety Legislation, including: <ul> <li>Safety, Health and Welfare at Work Act 2005 (No. 10 of 2005);</li> <li>Safety, Health and Welfare at Work (General Application) (Amendment) Regulations 2016 (S.I. No. 36 of 2016);</li> <li>S.I. No. 528/2021 - Safety, Health and Welfare at Work (Construction) (Amendment) Regulations 2021 and</li> <li>Safety, Health and Welfare at Work (Work at Height) Regulations 2006 (S.I. No. 318 of 2006).</li> </ul> </li> <li>A Health and Safety Plan covering all aspects of the construction process will address the Health and Safety requirements in detail.</li> </ul>							
MM46	Human Health	EIAR Section 5	Signage indicating the designated pedestrian route site along the Western Way will be in place during the construction phase of the development. Likewise, appropriate construction site warning signage and health and safety signage will be in place along the Western Way and on the approach to the construction site at all times during the							



Ref. No.	Reference	Reference	Mitigation Measure	Audit	Action Required
	Heading	Location		Result	
			construction phase to ensure that any potential impacts pertaining to existing amenity		
			access is mitigated against. Furthermore, all health and safety procedures as detailed		
			in section 5.10.2.1 will be strictly adhered to ensure not only the safety of construction		
			staff but any users of the Western Way during the construction phase.		
			> Local residents will be kept informed of the proposed working		
MM47	Human Health	EIAR Section	schedule, where appropriate, including the times and duration of		
		5	any abnormally noisy activity that may cause concern;		
			The core hours for construction activity will be 07:00 to 19:00		
			Monday to Friday and 07:00 to 13:00 Saturday. There will be no		
			working on Sundays and Public Holidays;		
			Any extraordinary site work occurring outside of the core working		
			hours (for example, crane operations lifting components onto the		
			tower) will be programmed, when appropriate, so that haulage		
			vehicles would not arrive at or leave the site between 19:00 and		
			07:00, with the exception of abnormal loads that would be		
			scheduled to avoid anticipated periods of high traffic flows;		
			> All vehicles and mechanical plant will be fitted with effective		
			exhaust silencers and be subject to programmed maintenance;		
			> Inherently quiet plant will be selected where appropriate and		
			available - all major compressors would be 'sound reduced' models		
			fitted with properly lined and sealed acoustic covers, which would		
			be kept closed whenever the machines are in use;		
			All ancillary pneumatic percussive tools will b e fitted with mufflers		
			or silencers of the type recommended by the manufacturers;		
			Machines will be shut down between work periods (or when not in		
			use) or throttled down to a minimum;		
			All equipment used on site will be regularly maintained, including		
			maintenance related to noise emissions;		
			> Vehicles will be loaded carefully to ensure minimal drop heights		
			so as to minimise noise during this operation; and		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			All ancillary plant such as generators and pumps will be positioned so as to cause minimum noise disturbance and if necessary, temporary acoustic screens or enclosures will be provided.		
			Operational Phase		
MM48	Human Health	EIAR Section 5	<ul> <li>Access to the turbines is through a door at the base of the structure, which will be locked at all times outside maintenance visits.</li> <li>Staff associated with the project will conduct frequent visits, which will include inspections to establish whether any signs have been defaced, removed or are becoming hidden by vegetation or foliage, with prompt action taken as necessary.</li> <li>Signs will also be erected at suitable locations across the site as required for the ease and safety of operation of the proposed renewable energy development. These signs include:         <ul> <li>Buried cable route markers at 50m (maximum) intervals and change of cable route direction;</li> <li>Directions to relevant turbines at junctions;</li> <li>"No access to Unauthorised Personnel" at appropriate locations;</li> <li>"Danger HV" at appropriate locations;</li> <li>"Warning – Keep clear of structures during electrical storms, high winds or ice conditions" at site entrance;</li> <li>"No unauthorised vehicles beyond this point" at specific site entrances; and</li> <li>Other operational signage required as per site-specific hazards.</li> </ul> </li> <li>An operational phase Health and Safety Plan will be developed to fully address identified Health and Safety issues associated with the operation of the site and providing for access for emergency services at all times</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
MM49	Shadow Flicker	EIAR Section 5	<ul> <li>Where daily shadow flicker exceedances have been predicted at buildings by the modelling software, a site visit will be undertaken firstly to determine the level of occurrence, existing screening and window orientation.</li> <li>Screening Measures</li> <li>In the event of an occurrence of shadow flicker exceeding guideline threshold values of 30 minutes per day at a residential receptor, mitigation options will be discussed with the affected homeowner, including: <ul> <li>Installation of appropriate window blinds in the affected rooms of the residence;</li> <li>Planting of screening vegetation;</li> <li>Other site-specific measures which might be agreeable to the affected party and may lead to the desired mitigation.</li> </ul> </li> <li>If agreement can be reached with the homeowner, then it would be arranged for the required mitigation to be implemented in cooperation with the affected party as soon as practically possible and for the full costs to be borne by the wind farm operator.</li> <li>Wind Turbine Control Measures</li> <li>If it is not possible to mitigate any identified shadow flicker limit exceedance locally using the measures detailed above, wind turbine control measures will be implemented.</li> <li>The wind farm's SCADA control system can be programmed to shut down any particular turbine at any particular time on any given day to ensure that shadow flicker occurrences at properties which are not naturally screened or cannot be screened with measures outlined above</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required					
	Chapter 6: Biodiversity									
	Pre-Commencement Phase									
MM50	Invasive Species Management	EIAR Section 6 CEMP Section 3	A pre-construction invasive species survey will be undertaken a part of the proposed project. This will provide updated data in advance of any construction given the intervention time period between the original survey work and any future grant of permission/ construction. Measures will be in place to prevent the spread of these species during the proposed works. In addition, all necessary precautions will be the table to be the species during the proposed works.							
			be taken to prevent the introduction of invasive species to the site from elsewhere.							
MM51	Fauna	EIAR Section 6	<ul> <li>A pre-construction badger survey will be undertaken at the location of the identified sett by a qualified ecologist prior to the commencement of any works to determine if the setts are in use and to identify any additional sett entrances that may have been excavated in the intervening period.</li> <li>The sett will be monitored for 2 weeks prior to construction using a camera trap to determine if it is in use.</li> <li>If the sett is found to be in use exclusion measures will be put in place prior to construction in line with NRA Guidelines to ensure that the sett is evacuated.</li> <li>As per NRA guidelines Exclusion from an active sett will only be carried out during the period of July to November inclusive in order to avoid the badger breeding season.</li> <li>During the breeding season (December to June inclusive) no works will be undertaken within 50m of active setts nor blasting or pile driving within 150m of active setts.</li> <li>Exclusion zone fencing and appropriate signage will be put in place around the main sett to the south of the substation which lies outside the construction footprint. This will ensure that there</li> </ul>							



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			will be no vehicles tracking in the area and no temporary storage of construction materials that could impact the sett.		
MM52	Fauna	EIAR Section 6	<ul> <li>From a precautionary basis, a pre-commencement otter survey will be undertaken in accordance with standard best practice guidance prior to the commencement of site works.</li> <li>Should the surveys identify the presence of an otter holt, the following measures will be undertaken a National Parks and Wildlife Service and a derogation licence will be applied for (although compliance with such a licence has not been relied on in this assessment).</li> <li>No works will be undertaken within 150m of any holts at which breeding females or cubs are present.</li> <li>No wheeled or tracked vehicles (of any kind) should be used within 20m of active, but non-breeding, otter holts. Light work, such as digging by hand or scrub clearance should also not take place within 15m of such holts, except under licence (TII, 2008b).</li> </ul>		
MM53	Bats	Appendix 6-2	NatureScot recommends that a distance of 50m between turbine blade tip and nearest woodland (or other key habitat features) is adequate mitigation. This 50m buffer will be implemented from the outset and monitored as per the post construction monitoring.		
			Construction Phase		
MM54	Bats	EIAR Section 6 Appendix 6-2	<ul> <li>Plant machinery will be turned off when not in use and all plant and equipment for use will comply with the Construction Plant and Equipment Permissible Noise Levels Regulations (SI 359/1996).</li> <li>Exterior lighting, during construction, will be designed to minimize light spillage, thus reducing the effect on areas outside</li> </ul>		
			the Proposed Development, and consequently on bats i.e. Lighting will be directed away from mature trees/treelines around		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			the periphery of the site boundary to minimize disturbance to bats. Directional accessories can be used to direct light away from these features, e.g. through the use of light shields (Stone, 2013). The luminaries will be of the type that prevent upward spillage of light and minimize horizontal spillage away from the intended lands.		
MM55	Invasive Species	EIAR Section 6	<ul> <li>The treatment of Rhododendron is fully described in section 2.2 of the Biodiversity Management and Enhancement Plan (BMEP), available in appendix 6-5.</li> <li>Previously identified infested areas will be resurveyed prior to the commencement of the treatment procedures. The purpose of this is to identify if the Rhododendron has spread outside of previously mapped areas.</li> <li>Prior to the commencement of treatment, all areas identified for treatment will be marked with barrier tape.</li> <li>All staff will be fully trained and competent in the use of herbicides</li> <li>Rhododendron will be cut to a height of between 2 and 4cm above the ground and immediately sprayed with a 20% solution of glyphosate mixed with a dye.</li> <li>The application of herbicide will adhere to legislation and best practice protocols on all aspects including: the storage and application of herbicides, PPE, record keeping.</li> <li>All herbicide mixtures will be prepared off-site or in a designated area on the forest road network.</li> <li>Alternatively eco- plugs may be used. https://www.forestresearch.gov.uk/research/the-use-of-ecoplugs-forwoody-weed-control/</li> <li>Treated area will be monitored annually for three years, following the initial treatment. Further cutting and herbicide treatment will be carried out if required</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>Good construction site hygiene will be employed to prevent the spread and introduction of problematic invasive alien plant species (e.g. Japanese knotweed, Rhododendron, Giant Rhubarb etc.) by thoroughly washing vehicles prior to entering the site.</li> <li>Any soil and topsoil required on the site will be sourced from a stock that has been screened for the presence of any invasive species and where it is confirmed that none are present.</li> </ul>		
MM56	Aquatic Fauna	EIAR Section 6	In relation to new watercourse crossings, Inland Fisheries Ireland (IFI) will be consulted a minimum of four weeks in advance of the installation of pre-cast concrete bottomless box culverts. The Inland Fisheries Ireland (2016): Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters; and the Scottish Natural Heritage (SNH) Good Practice During Wind Farm Construction (SNH, 2019, 4th Edition) will also be adhered to. This will minimise the risk of entrainment of suspended sediment in surface water runoff, and transport via this pathway to surface watercourses (any deviation from this will be done in discussion with the IFI).		
MM57	Invasive Species	EIAR Section 6 CEMP Section 3	<ul> <li>The following measures are proposed to establish good site hygiene to ensure the control of any potential spread of invasive species during construction works, if they are identified prior to the commencement of the construction phase: <ul> <li>A risk assessment and method statement must be provided by the Contractor prior to commencing works.</li> <li>Fences will be erected around areas of infestation, as confirmed by test pits, and warning signs shall be erected.</li> <li>A designated wash-down area will be created, where powerwashed material from machinery can be contained, collected and disposed of with other contaminated material. This area will contain a washable membrane or hard surface.</li> <li>Stockpile areas will be chosen to minimise movement of contaminated soil.</li> <li>Stockpiles will be marked and isolated.</li> </ul> </li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>Contaminated areas which will not be excavated will be protected by a root barrier membrane if they are likely to be disturbed by machinery. Root barrier membranes will be protected by a layer of sand above and below and topped with a layer of hardcore.</li> <li>The use of vehicles with caterpillar tracks within contaminated areas will be avoided to minimise the risk of spreading contaminated material.</li> <li>An ECoW/suitably qualified ecologist will be on site to monitor and oversee the implementation of invasive species management plans.</li> <li>Plant and equipment which is operated within an area for the management of materials in contaminated areas should be decontaminated prior to relocating to a different works area. The decontamination procedures should take account of the following:</li> <li>Personnel may only clean down if they are familiar with the plant and rhizome material and can readily identify it.</li> <li>Decontamination will only occur within designated wash-down areas.</li> <li>Vehicles will be cleaned using stiff-haired brush and pressure washers, paying special attention to any areas that might retain rhizomes e.g. wheel treads and arches.</li> <li>All run-off will be isolated and treated as contaminated areas.</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
MM58	Flora and Fauna	EIAR Section 6	The Proposed Development has the potential to result in enhancement of the surrounding areas through habitat rehabilitation management (as described in the Biodiversity and Enhancement Management Plan) that will be implemented during the construction phase of the Proposed Development and maintained during the operational phase. Details of the management that will be undertaken are provided in the Biodiversity and Enhancement Management Plan in Appendix 6-4 of the EIAR. These include: <ul> <li>Conifer Felling</li> <li>Drain Blocking</li> <li>Vegetation Monitoring</li> <li>Hydrological Monitoring</li> </ul>		
			Operational Phase		
MM59	Bats	EIAR Section 6 Appendix 6-2	In order to reduce the value of the habitat for bat species in the areas surrounding the turbines, a buffer of at least 50m between the tip of the blade and any trees or other tall vegetation that could provide high quality foraging habitat for bat species will be implemented. A full description of the mitigation measures proposed during operational phase are described in section 6.1 of the Bat report. Details of this mitigation and how it is calculated is provided in Appendix 6-2.		
			<b>Blade Feathering</b> On a precautionary basis, and in addition to buffers applied to habitat features, it is proposed that all wind turbines are subject to 'feathering' of turbine blades when wind speeds are below the cut-in speed of the proposed turbine. This means that the turbine blades are pitched at 90 degrees or parallel to the wind to reduce their rotation speed to below two revolutions per minute while idling. This measure has		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required		
	Fleading		<ul> <li>been shown to significantly reduce bat fatalities (by up to 50%) in some studies (NIEA, 2021).</li> <li>Bat Mitigation and Monitoring Plan</li> <li>Full details of the proposed operational bat monitoring programme for the Proposed Development are provided in Section 6.2.1 of the Bat Report (Appendix 6-2) <ul> <li>The post-construction surveys will be carried out as per the preconstruction survey effort. Post-construction monitoring will include static detector surveys, walked survey transects and corpse searching to record any bat fatalities resulting from collision.</li> <li>Static monitoring shall take place at each turbine during the bat activity season (between April and October) (NatureScot, 2021, NIEA, 2021).</li> <li>Caracass searches, to monitor and record bat fatalities, shall be conducted at each turbine in accordance with NIEA Guidance. This shall include searcher efficiency trials and an assessment of scavenger removal rates to determine the appropriate correction factor to be applied in relation to determining an accurate estimate of collision mortality.</li> </ul> </li> <li>Monitoring surveys shall continue in Year 2 and 3, and where a curtailment requirement has been identified, the success of the curtailment strategy shall be assessed in line with the baseline data collected in the preceding year(s).</li> </ul>	Result			
	Decommissioning Phase						



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
MM60	Decommissioning	EIAR Section 6	The same mitigation to prevent significant impacts on water quality and associated aquatic fauna and other terrestrial fauna during construction will be applicable to the decommissioning phase. An outline decommissioning plan is contained in the CEMP, Appendix 4-4 of the EIAR. The CEMP for the project provides the details of the mitigation and best practice that will be employed to avoid any potential for significant residual effects on biodiversity during decommissioning of the proposed wind farm.		
			Chapter 7 Birds (Appendix 7-1)		
			Pre-Commencement Phase		
MM61	Birds	Appendix 7-1	During the breeding season (March-August) bird monitoring surveys within the Proposed Development site will take place to a distance of 500 m from the development area. However, for the bogs to the west of site, the survey that was carried out in 2022 will be repeated, with transects up to 1,000 m from the edge of the forest.		
MM62	Birds	Appendix 7-1	It is noted that the wet bog to the southwest and south of the site had not been included in the 2022 survey for health and safety reasons –. The assumption has been made that sensitive breeding species may be present (as habitat is certainly suitable to support same) and a restrictive zone of 500 m from the forest/bog edge will be implemented during the breeding season as a precautionary measure. The survey for breeding birds on the bog (following Brown and Shepherd 1993) will take place in the April to July period (4 visits) in the season before works,		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			including tree felling, commence. This schedule will provide guidance to the contractor on where restrictive zones are likely to be required.		
			Construction Phase		
MM63	Birds	Appendix 7-1	Should any of these species be recorded breeding within the given distances of the works area (as established through confirmatory surveys before and/or during construction) a buffer zone (see appendix 7-1) shall be established around the expected location of the nest (location identified as far as is possible without causing disturbance to the bird) and all works will be restricted within the zone until it can be demonstrated by an ornithologist that the species has completed the breeding cycle in the identified area. Any restricted area that is required to be set up will be marked clearly using hazard tape fencing and all site staff will be alerted through toolbox talks. The above mitigation, which will apply from March to August (inclusive), will ensure that the works will not have adverse effects on the identified IEFs.		
MM64	Birds	Appendix 7-1	Any ground clearance of habitat that could support breeding birds (during period March to August) will be walked to establish the presence of breeding birds (mainly passerines). This will be done by an ornithologist up to 10 days before the clearance works take place. If 10 days elapse without the clearing commencing, a further survey will take place. The focus will be on the area to be cleared but zones up to 100 m (approximately) around the area will also be included. Should a breeding territory be identified, the surveyor will attempt to establish the phase of building, e.g. nest building, incubating, feeding young, and will advise the contractor accordingly on measures to be followed		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required					
	Operational Phase									
MM65	Birds	Appendix 7-1	Areas of forest around turbines which are cleared of trees will be managed to prevent establishment of scrub and rank vegetation which would encourage small mammals and birds and attract species such as kestrel to hunt near the turbines and increase risk of collision. This maintenance will be carried out on an annual basis by mowing or strimming.							
	Decommissioning Phase									
MM66	Birds	Appendix 7-1	As the decommissioning works will involve works similar to those involved at construction stage, these could result in similar effects on birds. Hence, the mitigation that will be undertaken during construction will also be applied during the decommissioning phase (taking into account changes that may have occurred locally during the operational life of the project).							
			EIAR Chapter 8 Land Soils & Geology							
			Pre-Commencement Phase							
MM67	Earthworks	EIAR Section 8	<ul> <li>Placement of turbines and associated infrastructure in areas with shallower peat has been achieved during the design phase;</li> <li>Maximum use of the existing road network to reduce peat excavation and borrow pit volumes;</li> <li>A minimal volume of peat and subsoil will be removed to allow for infrastructural work to take place in comparison to the total volume</li> </ul>							



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>present on the site due to optimisation of the layout by mitigation by design (avoidance of deep peat areas);</li> <li>A suitable drainage system to be constructed to ensure continuity of the site hydrology (EIAR Chapter 9).</li> <li>All temporary cuts/excavations will be carried out such that they are stable or adequately supported. Gravel/rock fill will be used to provide additional support to temporary cuts/excavations where appropriate, as determined by the Project Geotechnical Engineer. Unstable temporary cuts/excavations will not be left unsupported. Where appropriate and necessary, temporary cuts and excavations will be protected against the ingress of water or erosion.</li> <li>To mitigate against the compaction of soil at the site, prior to the commencement of any earthworks, the work corridor will be pegged, and machinery will stay within this corridor so that peatland / soils outside the work area is not damaged. Excavations will then be carried out from access tracks, where possible, as they are constructed in order to reduce the compaction of soft ground.</li> <li>Soil excavated from trenches along the proposed grid connection route will be stored with the borrow pits on the Site. The tarmac / asphalt layers will be taken to a licenced facility for disposal or recycling. If feasible, the upper layers of tarmac and asphalt will be excavated separately to the lower engineered fill layers</li> </ul>		
			Construction Phase		
MM68	Contamination of Soils	EIAR Section 8	<ul> <li>Minimal refuelling or maintenance of construction vehicles or plant will take place on site. Off-site refuelling will occur at a controlled fuelling station;</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>On site re-fuelling will be undertaken using a double skinned bowser with spill kits readily available on site for accidental leakages or spillages;</li> <li>On site re-fuelling will be undertaken by suitably trained personnel only under a permit to refuel system;</li> <li>Fuels stored on site will be minimised. Storage areas located at the temporary compounds where required will be bunded appropriately for the fuel storage volume for the time period of the construction and fitted with a storm drainage system and an appropriate oil interceptor;</li> <li>The electrical substation will be bunded appropriately to the volume of oils likely to be stored, and to prevent leakage of any associated chemicals and to groundwater or surface water. The bunded area will be fitted with a storm drainage system and an appropriate oil interceptor;</li> <li>The plant used during construction will be regularly inspected for leaks and fitness for purpose;</li> <li>All waste tar material arising from the chipping and resurfacing of the public road portion of the temporary construction and Environmental Management Plan (Appendix 4-3 of this EIAR). Spill kits will be available to deal with and accidental spillage in and outside the refuelling area.</li> </ul>		
<b>MM</b> 69	Erosion of soils	EIAR Section 8	To mitigate against erosion of the exposed soil or rock, all excavations will be constructed and backfilled as quickly as possible. Excavations will stop during or prior to heavy rainfall events. To mitigate against possible contamination of the exposed soils and bedrock, refuelling of machinery and plant will only occur at designated refuelling areas.		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
MM70	Felling	EIAR Section 8	During tree felling, brash mats will be used to support vehicles on soft ground, reducing peat and mineral soils erosion and avoiding the formation of rutted areas, in which surface water ponding can occur. Brash mat renewal will take place when they become heavily used and worn. Provision will be made for brash mats along all off-road routes, to protect the soil from compaction and rutting.		
MM71	Peat Instability	EIAR Section 8 Appendix 8-1	<ul> <li>The following measures which will be implemented during the construction phase of the project will ensure the management of the risks for this site.</li> <li>Appointment of experienced and competent contractors;</li> <li>The site will be supervised by experienced and qualified personnel, including a project Geotechnical Engineer;</li> <li>Allocate sufficient time for the project (be aware that decreasing the construction time has the potential to increase the risk of initiating a peat movement);</li> <li>Prevent undercutting of slopes and unsupported excavations. All temporary cuts/excavations will be carried out such that they are stable or adequately supported. Gravel/rock fill will be used to provide additional support to temporary cuts/excavations where appropriate, as determined by the Project Geotechnical Engineer. Unstable temporary cuts/excavations will not be left unsupported. Where appropriate and necessary, temporary cuts and excavations will be protected against the ingress of water or erosion.</li> <li>Excavation will be carried out from access roads or hardstanding areas to avoid tracking of construction plant across areas of soft ground/peat.</li> <li>Maintain a managed robust drainage system (see Chapter 4 and 9 of this EIAR for details);</li> </ul>		



Ref. No.	Reference	Reference	Mitigation Measure	Audit	Action Required
	Heading	Location	Set up, maintain and report findings from monitoring systems (as	Result	
			described in the Peat & Spoil Management Plan, Appendix 4-2);		
			<ul> <li>Where possible, earthworks will not be commenced when heavy or</li> </ul>		
			sustained rainfall is forecast. A rainfall gauge will be installed on site		
			to provide a record of rainfall intensity. An inspection of site stability		
			and drainage by the Project Geotechnical Engineer will be carried		
			out on site when a daily rainfall of over 15mm is recorded on site,		
			works will only recommence after heavy rain with the prior approval		
			of the Project Geotechnical Engineer following their inspection.		
			Engineer and Contractor to ensure that construction method		
			statements are followed; and,		
			Revise the Geotechnical Risk Register, as necessary, as construction progresses to		
			ensure that risks are managed and controlled.		
			Operational Phase		
		EIAR Section	Mitigation measures for soils and geology during the operational stage include the		
<b>MM</b> 72	Soils and Geology	8	use of aggregate from local, authorised quarries for use in road and hardstand		
			maintenance. Oil used in transformers (at the substation and within each turbine)		
			and storage of oils in tanks at the substation could leak during the operational phase		
			and impact on ground/peat and subsoils and groundwater or surface water quality.		
			The substation transformer, and oil storage tanks will be in a concrete bund capable		
			of holding 110% of the stored oil volume. Turbine transformers are located within		
			the turbines, so any leaks would be contained within the turbine structure. These		
			mitigation measures are sufficient to reduce risk to ground/peat/soils and subsoils,		
			and groundwater and surface water quality.		
		EIAR Section	Decommissioning Phase           Mitigation measures applied during decommissioning activities will be similar to		
<b>MM</b> 73	Decommissioning	8	those applied during construction where relevant.		
1011017.5	Phase	0	anose applied during construction where relevant.		
	1 mase				



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required						
	Incading	Locaton	EIAR Chapter 9 Hydrology	Result							
	Pre-Commencement Phase										
MM74	Clear-felling of Coniferous Plantation	EIAR Section 9	<ul> <li>Mitigation by Avoidance: There is a requirement in the Forest Service Code of Practice and in the FSC Certification Standard for the installation of buffer zones adjacent to aquatic zones. Minimum buffer zone widths recommended in the Forest Service (2000) guidance document "Forestry and Water Quality Guidelines"</li> <li>Mitigation by Design: Mitigation measures will be implemented wherever clear-</li> </ul>								
			felling is planned. The objective will be to mitigate the risk of mobilising suspended solids and nutrients into drains and surface water courses, as follows:								
			<ul> <li>Small felling areas (&lt;25ha), sequencing of felling to avoid intense felling in one sub catchment.</li> <li>Limiting felling areas and sequencing the felling to avoid intense felling in one subcatchment.</li> <li>Machine combinations (<i>i.e.</i> handheld or mechanical) will be chosen which are most suitable for ground conditions and which will minimise soils disturbance.</li> <li>Sediment/Silt traps will be strategically placed downslope within forestry drains near streams before ground preparation. The purpose is to slow water flow, increase residence time, and allow settling of silt. No direct</li> </ul>								
			<ul> <li>discharge of such ditches to water courses will occur.</li> <li>Crossing of streams away from bridges and culverts will not be permitted. Checking and maintenance of roads and culverts will be ongoing throughout felling activity. No tracking of vehicles through watercourses will occur. Existing interceptor drains will also not be disturbed.</li> <li>Clay, soil and silts will be removed from roads during wet periods and dust will be suppressed during dry spells.</li> </ul>								



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>Main drains that accommodate the discharge from collector drains will include rock armour, as required, where there are steep gradients.</li> <li>On steep slopes and where felling inside the 50 metre buffer is required, it will be necessary to install double or triple sediment traps. All drainage channels will taper out before entering the buffer zone. This ensures that discharged water fans out over the buffer zone before entering the aquatic zone, with sediment filtered out by ground vegetation within the zone.</li> <li>Drains and silt traps will be maintained throughout all felling works, ensuring that they are clear of sediment build-up and are not severely eroded. Machine access will be maintained to enable the accumulated sediment to be excavated. Sediment will be carefully disposed of in dedicated disposal areas.</li> <li>Correct drain alignment, spacing and depth will ensure that erosion and sediment build-up are minimized and controlled.</li> <li>Brash management/removal.</li> <li>Brash mats will be used to support vehicles on soft ground, reducing soil erosion and avoiding the formation of rutted areas. Brash mat renewal will take place when they become heavily used and worn. Provision will be made for brash mats along all off-road routes, to protect the soil from compaction and rutting. Where there is risk of severe erosion, extraction will be suspended during periods of high rainfall.</li> <li>Timber will be stacked in dry areas and outside a 50 metre buffer. Straw bales and check dams will be emplaced on the downgradient side of timber storage/processing sites.</li> <li>Works will not be carried out during significant rainfall events (see Section 9.4.2.2) in order to minimise entrainment of exposed sediment in surface water run-off.</li> <li>Branches, logs or debris will not be allowed to build up in aquatic zones. All such material will be removed when tree-felling operations have been completed.</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>Drain Inspection and Maintenance: The following items will be carried out during pre-felling inspections and after:</li> <li>Communication with tree felling operatives in advance to determine whether any areas have been reported where there is unusual water logging or bogging of machines (<i>i.e.</i>, hot spot areas).</li> <li>Inspections of plant and machinery will be carried out prior to any works to assure all are in good condition.</li> <li>Inspection of drainage ditches and outfalls. During pre-felling inspections, the main drainage ditches will be identified. The pre-felling inspection will be carried out during rainfall events.</li> <li>Following tree felling, all main drains will be inspected to ensure that they are functioning.</li> <li>Extraction tracks nears drains need to be broken up and diversion channels created to ensure that water in the tracks spreads out over the adjoining ground; Culverts on drains exiting the site will be unblocked.</li> <li>All accumulated silt will be removed from drains and culverts, and silt traps, and this removed material will be deposited away from watercourses to ensure that it will not be carried back into the trap or stream during subsequent rainfall.</li> </ul>		
MM75	Earthworks	EIAR Section 9	<ul> <li>Mitigation by Avoidance: Works areas will be kept at least 50 m from water courses to the extent possible. The proposed setback distance/buffer will serve to avoid:</li> <li>Direct physical damage to watercourses and associated releases of sediment.</li> <li>Direct entry of suspended sediments from earthworks into watercourses.</li> <li>Direct entry of suspended sediments from the drainage system into watercourses, which is achieved in part by ending drain discharges outside the buffer and allowing percolation across the vegetation within the buffer.</li> </ul>		



Ref. No.	Reference	Reference	Mitigation Measure	Audit	Action Required
	Heading	Location		Result	
			<ul> <li>Risks and effects of earthworks are made greater during storm events. Hence, earthworks will not be carried out during significant storm events. The works programme for the entire construction stage of the development will take account of weather forecasts, notably predicted rainfall. Large excavations and movements of soil/subsoil or vegetation stripping will be scaled back or suspended if heavy rain is forecast. Threshold rainfall values will serve to guide decisions to suspend works, visually and/or judged from weather forecasting, by either of the following: <ul> <li>High-intensity rainfall events, &gt;10 mm/hr.</li> <li>Heavy frontal rainfall lasting most of the day, &gt;25 mm in a 24-hour period.</li> <li>More than half the monthly average rainfall over 7 days.</li> </ul> </li> <li>The checking and communication of weather forecasts are part of the CEMP. Prior to suspending works for climatic reasons, the following control measures will be completed: <ul> <li>Open excavations will be secured.</li> <li>Temporary or emergency drainage will be provided to prevent back-up of surface runoff in work areas.</li> <li>Working for up to 12 hours after heavy rainfall events will be avoided to ensure drainage systems are not overloaded. Decisions are subject to visual inspection and judgement by the resident (supervising) engineer. The intent and objective is to control erosion, avoid collapses of embankments, and limit the mobilisation and transport of sediments.</li> </ul></li></ul>		
			<b>Mitigation by Design:</b> Key mitigation by design measures that will be implemented comprise source controls, in-line controls and treatment systems, as follows:		
			<ul> <li><u>Source control measures</u> cover working areas, staging areas and stockpiles. Methods that will be employed are diversion drains, flume pipes, sand bags, oyster bags filled with gravel, and filter fabrics.</li> </ul>		



Ref. No.	Reference	Reference	Mitigation Measure	Audit	Action Required
	Heading	Location		Result	
			<ul> <li>Flexibility to adapt methods will be required based on location-specific conditions, as judged by supervising engineers from visual inspection.</li> <li><u>In-Line controls</u> involve settling of suspended sediments and particulate organic matter with the use of silt fences, straw bales, sand or oyster bags, weirs, baffles, and check dams. Flow limiters and sump pumping systems may be employed where needs arise in order to maintain the hydraulic functioning of the existing drain system.</li> <li>Treatment systems involve sediment traps and temporary sumps/attenuation ponds.</li> </ul>		
MM76	Site Drainage Management	EIAR Section 9 CEMP Section 3	The works programme for the entire construction stage of the development will take account of weather forecasts and predicted rainfall. Large excavations and movements of soil/subsoil or vegetation stripping will be scaled back or suspended if heavy rain is forecast. The extent to which works will be scaled back or suspended will relate directly to the amount and intensity of rainfall that is forecast. The following relevant forecasting systems are available and will be relied on for said purpose, on a daily basis:		
			<ul> <li>General Weather Forecasts: Available from national to county level from Met Éireann (www.met.ie/forecasts). These do not provide quantitative rainfall estimates.</li> <li>3-hour Rainfall Maps: Forecast quantitative rainfall amounts for the next 3 hours but does not account for possible heavy localised events.</li> <li>Rainfall Radar Images: Images covering the entire country are freely available from the Met Éireann website (www.met.ie/latest/rainfall_radar.asp). The images are a composite of radar data from Shannon and Dublin airports and give a picture of current rainfall extent and intensity. Images show a quantitative measure of recent rainfall. A 3-hour record is given and is updated every 15 minutes. Radar images are sequenced but not predictive.</li> <li>Consultancy Service: Met Éireann provide a 24-hour telephone consultancy service. The forecaster will provide interpretation of</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>weather data and give the best available forecast for the area of interest.</li> <li>Using threshold rainfall values will allow work to be safely controlled from a water management and protection perspective. Works will be suspended if forecasting suggests either of the following is likely to occur: <ul> <li>&gt;10 mm/hr (i.e. high intensity local rainfall events);</li> <li>&gt;25 mm in a 24-hour period (heavy frontal rainfall lasting most of the day);</li> <li>&gt;half monthly average rainfall in any 7 days.</li> </ul> </li> <li>Prior to works being suspended, the following control measures will be completed: <ul> <li>Secure all open excavations.</li> <li>Provide temporary or emergency drainage to prevent back-up of surface runoff.</li> <li>Avoid working during heavy rainfall and for up to 24 hours after heavy events to ensure drainage systems are not overloaded.</li> </ul> </li> </ul>		
			Construction Phase		-
MM77	Spills & Leaks	EIAR Section 9 CEMP Section 3	<ul> <li>Proposed mitigation measures to avoid releases of fuel and other chemicals at the site are:</li> <li>Onsite refuelling will be carried out by trained personnel only.</li> <li>Onsite refuelling of machinery will be done by mobile double-skinned fuel bowsers.</li> <li>Drip trays and fuel absorbent mats will be available and used during all refuelling operations</li> <li>A permit for the fuel system will be put in place.</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>Fuels stored onsite will be minimised. Fuel storage areas will be bunded to contain 110%v of the fuel storage volume for the time period of the construction. Rainwater will not be allowed to accumulate within the bund, and will thus be fitted with a storm drainage system and appropriate oil interceptor.</li> <li>The plant used during construction will be regularly inspected for leaks and fitness for purpose.</li> <li>Spill kits will be available to deal with and accidental spillage in and outside the re-fuelling area.</li> </ul>		
MM78	Peat & Spoil Placement Areas	EIAR Section 9	During the initial placement of peat and spoil, silt fences, straw bales and biodegradable matting will be used to control runoff from reinstatement areas. 'Siltbuster' treatment trains will be employed if previous treatment as listed above is not to a high quality. Drainage from peat placement areas will ultimately be routed to swales and stilling ponds with storage and settlement designed for a 6-hour duration, 1 in 100 year storm event, before being discharged to the on-site drains. Peat and spoil placement areas will be vegetated to reduce sediment entrainment in runoff. Once stabilised, these areas will no longer be a potential source of silt-laden runoff.		
MM79	Culverting	EIAR Section 9 CEMP Section 3	<ul> <li>Mitigation Measures by Avoidance: Machinery and personnel are kept out of the river directly. Direct in-stream works will be avoided.</li> <li>Mitigation Measures by Design: All works will be carried out in accordance with the CEMP which incorporates the best practice IFI "Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters" (IFI, 2016).</li> </ul>		



Ref. No.	Reference	Reference	Mitigation Measure	Audit	Action Required
	Heading	Location		Result	
			<ul> <li>Related activity incorporates many of the same measures that are presented in Section 9.4.2.2 (earthworks). Moreover: <ul> <li>All stream crossings will be bottomless-box or clear span culverts. Existing banks will remain undisturbed.</li> <li>Where proposed underground cabling routes follow an existing access track or a track proposed for upgrade, cables will pass over or below the culvert.</li> <li>Based on IFI (2016), the relevant work period is July to September inclusive, <i>i.e.</i>, the relatively drier summer period. Any deviation that may be temporarily necessary will be done in discussion with the IFI.</li> <li>During near-stream construction works, double-row silt fences will be emplaced immediately downgradient of work areas for the duration of activity.</li> <li>All new stream crossings will require a Section 50 application (Arterial Drainage Act, 1945). The river/stream crossings will be designed in accordance with OPW guidelines/requirements on applying for a Section 50 consent.</li> </ul> </li> </ul>		
MM80	Directional Drilling	EIAR Section 9	<ul> <li>Mitigation measures relating to the use of a mixture of a natural, inert and fully biodegradable drilling fluid such as Clear Bore<sup>™</sup> and water for directional drilling will be implemented in full, as follows:</li> <li>The area around the Clear Bore<sup>™</sup> batching, pumping and recycling plants will be bunded using terram and sandbags in order to contain any spillages.</li> <li>One or more lines of silt fences will be placed between the works area and adjacent rivers and streams on both banks.</li> <li>Accidental spillage of fluids will be cleaned up immediately and transported off site for disposal at a licensed facility.</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			Adequately sized skips will be used for temporary storage of drilling arisings during directional drilling works. This will ensure containment of drilling arisings and drilling flush		
MM81	Release of Cement-based Products	EIAR Section 9	<ul> <li>Mitigation Measures by Avoidance: <ul> <li>Concrete will be delivered in sealed concrete delivery trucks. Batching of wet-cement products will not occur on site. Readymixed supply of wet concrete products and where possible, emplacement of pre-cast elements, will take place.</li> <li>Pre-cast elements for culverts and concrete works will be used.</li> <li>Concrete trucks will not be washed out on site but will be directed back to their batching plant for washout.</li> </ul> </li> <li>Mitigation Measures by Design: <ul> <li>Where concrete is delivered on site, only the chute will be cleaned, using the smallest volume of water practicable. No discharge of cement-contaminated waters to the construction phase drainage system or directly to any artificial drain or watercourse will be allowed. Chute cleaning water will be undertaken at lined Siltbuster-type cement washout ponds, or equivalent (https://www.siltbuster.co.uk/sb_prod/siltbuster_roadside_concrete-washout.rcw/)</li> <li>Where temporary lined impermeable containment areas are used, such containment areas are typically built using straw bales and lined with an impermeable membrane. These are covered when not in use to prevent rainwater collecting.</li> <li>Pour sites of cement will be kept free of standing water, and plastic covers will be ready in case of sudden rainfall events.</li> </ul> </li> </ul>		



Ref. No.	Reference	Reference	Mitigation Measure	Audit	Action Required
	Heading	Location		Result	
			<ul> <li>Concrete will not be transported around the site in open trailers or dumpers so as to avoid spillage while in transport.</li> <li>All concrete used in the construction of turbine bases will be pumped directly into the shuttered formwork from the delivery truck. If this is not practical, the concrete will be pumped from the delivery truck into a hydraulic concrete pump or into the bucket of an excavator, which will transfer the concrete locally to the location where it is needed.</li> <li>Arrangements for concrete deliveries to the site will be discussed with suppliers before work starts, confirming routes, prohibiting on-site washout and discussing emergency procedures.</li> <li>Clearly visible signage will be placed in prominent locations close to concrete pour areas specifically stating washout of concrete lorries is not permitted on the site.</li> <li>Weather forecasting will be used to assist in planning large concrete pours and large pours will be avoided where prolonged periods of heavy rain is forecast.</li> <li>Concrete pumps and machine buckets from slewing over watercourses will be restricted while placing concrete.</li> <li>Excavations will be sufficiently dewatered before concreting begins and dewatering will continue while concrete sets.</li> <li>Covers will be available for freshly placed concrete to avoid the surface washing away in heavy rain.</li> <li>Any potential, small surplus of concrete will be disposed of after completion of a pour in suitable locations away from any watercourse or sensitive habitats.</li> </ul>		
<b>MM8</b> 2	Wastewater Management	EIAR Section 9	Wastewater from staff welfare facilities will be collected and brought offsite for disposal by authorised means to a wastewater treatment plant. The operation makes		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			use of a sealed storage tank and a permitted waste/wastewater collector. Wastewater will not be treated or disposed of onsite.		
MM83	Pumping from Open Pits	EIAR Section 9	<ul> <li>Mitigation by Avoidance: An upslope interceptor drain will be established upslope of the excavation area to prevent greenfield runoff into the excavations. Berms can also be used, as necessary, to keep runoff waters from entering open pits.</li> <li>Mitigation by Design: The water pumped by sump pumps will pass through silt bags before being discharged into the swale. As the water pass through the silt bags, the majority of sediment and organic matter is retained by geotextile fabric. The silt bags will be used with natural vegetation filters or sedimats. The sedimats will be secured to the ground surface using stakes/pegs. They will extend to the full width of the outfall to ensure that all water passes through this treatment measure. Level spreaders will be installed for each outfall.</li> <li>The footprints of excavations for infrastructure foundation works and hardstanding have been planned to be as small as practicable. Excavations will be backfilled after completion of installations, which will serve to restore water levels and drainage patterns, hence reduce the temporary drainage effects.</li> </ul>		
MM84	WFD Water Body Status	EIAR Section 9	Mitigation by Design: Mitigation measures are necessary and proposed to break potential source- receptor linkages and allow for attenuation. The means and methods of achieving the necessary levels of protection are proven and established based on existing guidance and practical experiences from other similar sites. Relevant mitigation measures are all of those described in the preceding sections for the construction phase. The Contractor will be legally required to adhere to the CEMP. Extensive monitoring will be undertaken to monitor water quality, identify potential effects, and take corrective action as necessary.		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required					
	Operational Phase									
MM85	Maintenance Works	EIAR Section 9 CEMP Section 3	<b>Mitigation by Design:</b> Maintenance works will be subject to control measures contained in the CEMP. Sediments removed will be staged, transported and disposed offsite at suitable and agreed disposal sites.							
<b>MM8</b> 6	Wastewater	EIAR Section 9	Mitigation Measures by Avoidance: Wastewater will not be treated or disposed of onsite.							
	•	•	Decommissioning Phase		•					
MM87	Decommissioning	EIAR Section 9	During decommissioning, it will be possible to reverse or at least reduce some of the potential effects caused during construction, and to a lesser extent operation, by rehabilitating constructed areas such as turbine bases and hardstanding areas. This will be done by re-establishing vegetation, thereby reducing runoff and sediment loads. Mitigation measures to avoid contamination by accidental fuel leakage and compaction of soil by on-site plant will be implemented as per the construction phase mitigation measures. With these measures, no significant effects on the hydrological and hydrogeological environment will occur during the decommissioning stage of the proposed development.							
			Chapter 10 Air & Climate							
			Construction Phase							
MM88	Exhaust Emissions	EIAR Section 10	<ul> <li>All construction vehicles and plant used onsite during the construction phase will be maintained in good operational order. If a vehicle</li> </ul>							



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>requires repairs this work will be caried out, thereby minimising any emissions that arise.</li> <li>Turbines components will be transported to the Site on specified routes only, unless otherwise agreed with the Planning Authority.</li> <li>All machinery will be switched off when not in use.</li> <li>Users of the Site will be required to ensure that all plant and vehicles are suitably maintained to ensure that emissions of engine generated pollutants is kept to a minimum.</li> <li>The majority of aggregate materials for the construction of the Proposed Development will be obtained from the borrow pits on site. This will significantly reduce the number of delivery vehicles accessing the site, thereby reducing the amount of emissions associated with vehicle movements.</li> <li>The MRF facility will be local to the Proposed Development site to reduce the amount of emissions associated approximately 37km to the east of the Wind Farm Site.</li> <li>Waste associated with the construction of the Grid Connection underground electrical cabling route will be disposed of at the closest MRF to where waste is generated along the underground electrical cabling route, is located approximately 37km to the east.</li> </ul>		
MM89	Dust Emissions	EIAR Section 10 CEMP Section 3	<ul> <li>A wheel wash facility will be installed on the Proposed Development site and will be used by vehicles before leaving site.</li> <li>In periods of extended dry weather, dust suppression may be necessary along haul roads, site roads, grid route, road widening sections, substation, and construction compounds and around the borrow pit area to ensure dust does not cause a nuisance. If necessary, such as</li> </ul>		
			during periods of dry weather, de-silted water will be taken from stilling ponds in the site's drainage system and will be pumped into a bowser		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>or water spreader to dampen down haul roads, turbine bases, borrow pit and site compounds to prevent the generation of dust where required. Water bowser movements will be carefully monitored by the Ecological Clerk of Woks to avoid, insofar as reasonably possible, increased runoff as outlined in the CEMP.</li> <li>Areas of excavation will be kept to a minimum and stockpiling of excavated material will be minimised by coordinating excavation, placement of material in peat placement areas and restoration of borrow pits.</li> <li>Turbines components and construction materials will be transported to the site on specified haul routes only, as agreed with the local authority.</li> <li>The agreed haul route roads adjacent to the site will be regularly inspected for cleanliness and cleaned as deemed necessary by the construction Site Supervisor/Site Manager.</li> <li>The transport of construction materials may have the potential to generate dust in dry weather conditions. Roads will be watered down to suppress dust particles in the air as deemed necessary by the Site Supervisor/Manager.</li> <li>The transport of dry excavated material from the on-site borrow pits, which may have potential to generate dust will be minimised. If necessary, such as in periods of dry weather, excavated material will be dampened prior to transport from the borrow pits.</li> <li>A Construction and Environmental Management Plan (CEMP) will be in place throughout the construction phase</li> </ul>		
			Any vehicles or plant brought onsite during the operational phase will be		
MM90	Exhaust Emissions	EIAR Section 10	maintained in good operational order		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required					
	Decommissioning Phase									
MM91	Decommissioning Phase	EIAR Section 10	The mitigation measures prescribed for the construction phase of the Proposed Development will be implemented during the decommissioning phase thereby minimising any potential impacts.							
			EIAR Chapter 11 Noise							
	1		Pre-Commencement Phase							
MM92	Construction Noise	EIAR Section	Local residents will be kept informed of the proposed working schedule, where appropriate, including the times and duration of any abnormally noisy activity that may cause concern;							
			Construction Phase							
<b>MM</b> 93	Construction Noise	EIAR Section 11	<ul> <li>Good site practices will be implemented to minimise the likely effects. Section 8 of BS5228-1:2009+A1:2014 recommends a number of simple control measures as summarised below that will be employed onsite: <ul> <li>Local residents will be kept informed of the proposed working schedule, where appropriate, including the times and duration of any abnormally noisy activity that may cause concern;</li> <li>Any extraordinary site work occurring outside of the core working hours (for example, crane operations lifting components onto the tower) will be programmed, when appropriate, so that haulage vehicles would not arrive at or leave the site between 19:00 and 07:00, with the exception of abnormal loads that would be scheduled to avoid anticipated periods of high traffic flows;</li> <li>All vehicles and mechanical plant will be fitted with effective exhaust silencers and be subject to programmed maintenance;</li> <li>Inherently quiet plant will be selected where appropriate and available - all major compressors would be 'sound reduced' models fitted with properly lined and sealed acoustic covers, which would be kept closed whenever the machines are in use;</li> <li>All ancillary pneumatic percussive tools will be fitted with mufflers or silencers of the type recommended by the manufacturers;</li> </ul> </li> </ul>							



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>Machines will be shut down between work periods (or when not in use) or throttled down to a minimum;</li> <li>All equipment used on site will be regularly maintained, including maintenance related to noise emissions;</li> <li>Vehicles will be loaded carefully to ensure minimal drop heights so as to minimise noise during this operation; and</li> <li>All ancillary plant such as generators and pumps will be positioned so as to cause minimum noise disturbance and if necessary, temporary acoustic screens or enclosures will be provided.</li> </ul>		
			Operational Phase		
MM94	Operational Phase Noise	EIAR Section 11	In order to meet the noise limits at NAL3 and H02, Turbine 18 will need to be operated in a lower noise mode for a limited range of wind speeds (5 ms-1 during the daytime and 7-9 ms-1 during the night time period) and wind directions (north westerlies) when considering the 170 m rotor diameter candidate wind turbine modelled in the noise assessment.		
-			EIAR Chapter 12 Cultural Heritage		
			Construction Phase		
MM95	Sub Surface Archaeological Potential	EIAR Section 12	Archaeological monitoring of ground works during construction. This will include all excavation works within the EIAR site boundary as well as any topsoil removal along the haul route (two junction accommodation areas located at Tawnaghmore and Ballygalss East as described in Section Error! Reference source not found If archaeological finds, features or deposits are uncovered during archaeological monitoring, the developer will be prepared to provide resources for the resolution of such features whether by preservation by record (excavation) or preservation in situ (avoidance). Once the project is completed, a report on the results of the monitoring will be compiled and submitted to the local		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			authorities and the National Monuments Service. The National Monuments Service will be informed of such findings to discuss		
			how best to proceed.		
			Chapter 14 Material Assets		
			Pre-Commencement		
MM96	Water Supply	EIAR Section 14	In advance of any construction activity for the grid route, the contractor will undertake pre-commencement surveys of the proposed route to confirm the presence or otherwise of any services such as water supply. If found to be present, the relevant service provider will be consulted with in order to determine the requirement for specific excavation or relocation methods and to schedule a suitable time to carry out works. In the event that water mains are encountered the water supply will be turned off by the utility so work can commence on diverting the service. The section of existing pipe will be removed and will be replaced with a new pipe along the new alignment of the service within the public road corridor. The works will be carried out in accordance with the specifications of the relevant utility provider.		
			Construction Phase		
MM97	Gas Pipeline	EIAR Chapter 14	<ul> <li>GNI will be notified within a minimum of 5 working days prior to commencement of construction.</li> <li>A minimum of 3 working days will be provided to GNI to mark out the transmission pipeline route.</li> <li>The marked area will be fenced off from wind farm vehicle or personnel entry during the construction phase. However, continuous access will be provided to all GNI members.</li> <li>The required construction zone setbacks as listed in Table 14-2 above will be in place and adhered to for the duration of the construction phase. As required in the GNI <i>Code of Practise</i>, where works e.g. road upgrades and crossing points fall within these zones, notification will be given to GNI. <i>+</i></li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>Should any backfilling over, or alongside the transmission pipeline, the developer will seek GNI's agreement to proceed. GNI require two working days' notice prior to any proposed backfilling.</li> <li>In the event of gas leakage do not switch any machinery on or off in the vicinity of the leak.</li> <li>Prohibit smoking, the use of naked flames, the use of electrical switches, the use of mobile phones and the use of all other ignition sources in the vicinity of the leak/damage.</li> <li>Evacuate all personnel away from and up wind of the affected area.</li> <li>Ensure that no one approaches the affected area without the consent of Gas Networks Ireland.</li> <li>Once clear of the area, report the damage or leakage, however minor it may appear, to the Gas networks Ireland 24hr Emergency Service on 1850 20 50 50.</li> <li>Do not attempt to repair the damage or stop the leak.</li> <li>All staff will be made aware of and adhere to the Health &amp; Safety Authority's 'Guidelines on the Procurement, Design and Management Requirements of the Safety, Health and Welfare at Work (Construction) Regulations 2006'. This will encompass the use of all necessary Personal Protective Equipment and adherence to the site Health and Safety Plan.</li> </ul>		
MM98	Overhead Lines	EIAR Section 14	<ul> <li>Goal posts will be established under the two overhead lines for the entirety of the construction phase. They will not exceed a height of 4.2 metres, unless specifically agreed with ESB Networks</li> <li>The suitability of machinery and equipment for use near power lines will be risk assessed.</li> <li>All staff will be trained on the routes and operating voltages of overhead electricity lines running across the L-52926. All staff will be trained to be aware of the risks associated with overhead lines.</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
			<ul> <li>All contractors that may visit the sites are made aware of the location of lines before they come on to site.</li> <li>Barriers will run parallel to the overhead line at a minimum horizontal distance of 6 metres on plan from the nearest overhead line conductor wire.</li> <li>Prior to the delivery of turbines to the Proposed Development site, a dry run of the route using vehicles with similar dimensions will occur. Please see section 14.1 above for details.</li> <li>When activities must be carried out beneath overhead lines, e.g. component delivery or grid cable laying, a site-specific risk assessment will be undertaken prior to any works. The risk assessment must take into account the maximum potential height that can be reached by the plant or equipment that will be used is undertaken prior to any works. Overhead line proximity detection equipment will be fitted to machinery when such works are required.</li> <li>Information on safe clearances will be provided to all staff and visitors.</li> <li>Signage indicating locations and health and safety measures regarding overhead lines will be erected in canteens and on site.</li> <li>All staff will be made aware of and adhere to the Health &amp; Safety Authority's 'Guidelines on the Procurement, Design and Management Requirements of the Safety, Health and Welfare at Work (Construction) (Amendment) Regulations 2021'. This will encompass the use of all necessary Personal Protective Equipment and adherence to the site Health and Safety Plan.</li> </ul>		
			Operational Phase		
<b>MM</b> 99	Gas Pipeline	EIAR Chapter 14	Any maintenance works by the developer in the pipeline area will first require approval by GNI and all health and safety measures will be adhered to.		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
MM100	MM100 Telecommunications the Department of the EIAR Chapter 14 In the event of interference occurring to telecommunications, the Department of the Environment, Heritage and Local Government Wind Farm Planning Guidelines (2006) state that these effects can be dealt with by the use of divertor relay links out of line with the proposed wind turbines.				
MM101	Aviation	EIAR Chapter 14	IAA noted that given the distance from the site to the airports, general observations pertaining to lighting and turbine coordinate provision should be followed. Department of Defence provided general observations pertaining to lighting specifications. The requirements outlined will be adhered to.		
			Decommissioning Phase		
MM102	Decommissioning	EIAR Section 14	The measures outlined for the construction phase are considered the same for the decommissioning phase.		
			Chapter 14 – Traffic		
			Pre-Commencement		
MM103	Traffic		<ul> <li>Prior to the commencement of the construction phase of the Proposed Development a detailed Traffic Management Plan will be prepared by the Contractor for agreement with the relevant local authorities and An Garda Siochána . The TMP includes recommendations, which will include the measures below as a minimum requirement, for the following: <ul> <li>Traffic Management Coordinator – a competent Traffic Management Co-ordinator will be appointed for the duration of the project and this person will be the main point of contact for all matters relating to traffic management.</li> <li>Delivery Programme – a programme of deliveries will be submitted to the County Council in advance of deliveries of turbine components to site. Liaison with the relevant local authorities and Transport Infrastructure Ireland (TII) will be</li> </ul> </li> </ul>		



Ref. No.	Reference	Reference	Mitigation Measure	Audit	Action Required
	Heading	Location		Result	
			carried out where required regarding requirements such as		
			delivery timetabling. The programme will ensure that deliveries		
			are scheduled in order to minimise the demand on the local		
			network and minimise the pressure on the access to the site.		
			<b>Information to locals</b> – Locals in the area will be informed of any		
			upcoming traffic related matters e.g. temporary lane/road closures		
			(where required) or delivery of turbine components at night, via		
			letter drops and posters in public places. Information will include		
			the contact details of the Project Co-ordinator, who will be the		
			main point of contact for all queries from the public or local		
			authority during normal working hours. An "out of hours"		
			emergency number will also be provided.		
			A Pre and Post Construction Condition Survey – Where required		
			by the local authority, a pre-condition survey of roads associated		
			with the Proposed Development will be carried out immediately		
			prior to construction commencement to record an accurate		
			condition of the road at the time. A post construction survey will		
			be carried out after works are completed to ensure that any		
			remediation works are carried out to a satisfactory standard.		
			Where required the timing of these surveys will be agreed with		
			the local authority. All road surfaces and boundaries will be re-		
			instated to pre-development condition, as agreed with the local		
			authority engineers.		
			Liaison with the relevant local authority - Liaison with the County		
			Councils and An Garda Síochána / Police Service of Northern		
			Ireland, will be carried out during the delivery phase of the large		
			turbine vehicles, when an escort for all convoys will be required.		
			Once the surveys have been carried out and "prior to		
			commencement" status of the relevant roads established, (in		
			compliance with the provisions of the CEMP), the Roads section		
			will be informed of the relevant names and contact numbers for		



Ref. No.	Reference	Reference	Mitigation Measure	Audit Result	Action Required
	Heading	Location	<ul> <li>the Project Developer/Contractor Site Manager as well as the Site Environmental Manager.</li> <li>Implementation of temporary alterations to road network at critical locations – at locations highlighted in section 14.1.8. In addition, in order to minimise the impact on the existing environment during turbine component deliveries the option of blade adaptor trailers will also be used where deemed practicable.</li> <li>Identification of delivery routes – These routes will be agreed with the County Councils and adhered to by all contractors.</li> <li>Delivery times of large turbine components - The management plan includes the option to deliver the large wind turbine plant components at night in order to minimise disruption to general traffic during the construction workers – While the assessment above has assumed the worst case in that construction workers will drive to the site, the construction company will be required to provide a travel plan for construction staff, which will include the identification of routes to / from the site.</li> <li>Additional measures - Various additional measures will be put in place in order to minimise the effects of the development traffic on the surrounding road network including wheel washing facilities on site and sweeping / cleaning of local roads as required. These are set out in the CEMP which is contained in Appendix 4.3.</li> <li>Re-instatement works - All road surfaces and boundaries will be re-instated to pre-development condition, as agreed with the local authority engineers.</li> </ul>		



Ref. No.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
	110000000		Construction Phase	rtostav	
MM104	Traffic		<ul> <li>The construction of this development will require significant coordination and the following comprehensive set of mitigation measures will be put in place before and during the construction stage of the project in order to minimise the effects of the additional traffic generated by the proposed wind farm.</li> <li>Delivery of abnormal sized loads</li> <li>The following are the main points to note for these deliveries. These will take place after peak evening traffic: <ul> <li>The delivery of turbine components is a specialist transport operation with the transportation of components carried out at night when traffic is at its lightest and the impact minimised.</li> <li>The deliveries will be made in consultation with the Local Authority and An Garda Siochána.</li> <li>It is estimated that 189 abnormal sized loads will be delivered to the site, comprising 38 convoys of 5, undertaken over 38 separate nights.</li> <li>These nights will be spread out over an approximate period of 19 weeks and will be agreed in advance with the relevant authorities</li> <li>In order to manage each of the travelling convoys, for each convoy there will also be two escort vehicles provided by the haulage company for each convoy.</li> </ul> </li> </ul>		



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Ref. No.	Reference	Reference	Mitigation Measure	Audit	Action Required
	Heading	Location		Result	
			Decommissioning Phase		
MM105	Decommissioning	EIAR Section	When the Proposed Development is decommissioned, a decommissioning plan will		
		14	be prepared for agreement with the local authority, as described in Section 4.11 of		
			Chapter 4. This plan will include a traffic management plan and other similar mitigation measures to those implemented during the construction phase. In terms		
			of traffic effects the decommissioning stage will generally mirror the constructions		
			stage although the effects will be significantly reduced as the volumes of materials		
			removed from the site will be less.		



7.

# **MONITORING PROPOSALS**

All monitoring proposals relating to the pre-commencement, construction and operational phases of the Proposed Development were set out in various sections of the EIAR, NIS and Biodiversity Enhancement Plan prepared as part of the planning permission application to An Board Pleanála.

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

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



Table 7-1 Monitoring Measures

Ref. No.	Reference Heading	Reference Location	Monitoring Measure	Frequency	Reporting Period	Responsibility
110.	Heating	Locauon	Pre-Construction Phase		Tenod	
		FIAD			N	
MV1	D	EIAR	An inspection and maintenance plan for the drainage system	On going	Monthly	Project
MX1	Drainage	Section 4	on site will be prepared in advance of commencement of any			Hydrologist
	Maintenance		works. Regular inspections of all installed drainage systems			
		SWMP	will be necessary, especially after heavy rainfall, to check for			
		Section 4	blockages, and ensure there is no build-up of standing water at			
			parts of the systems where it is not intended. The inspection of			
			the drainage system will be the responsibility of the site ECoW			
			or the Project Hydrologist.			
		TIAD	Sampling will be completed before, during (if the operation is	As Required	Monthly	ECoW
MX2	Clear Felling	EIAR	conducted over a protracted time) and after the felling activity.			
	of Coniferous	Section 9	The 'before' sampling should be conducted within 4 weeks of			
	Plantation		the felling activity commencing, preferably in medium to high			
		SWMP	water flow conditions. The "during" sampling will be			
		Section 3	undertaken once a week or after rainfall events. The 'after'			
			sampling will comprise as many samplings as necessary to			
			demonstrate that water quality has returned to pre-activity			
			status (i.e. where an impact has been shown).			
			Baseline laboratory analysis of a range of parameters with			
			relevant regulatory limits and EQSs will also be undertaken as			
			per water monitoring programme for the overall Proposed			
			Development and each primary watercourse along the route.			
		SWMP	Prior to commencement of works in sub-catchments across the	As Required	Monthly	Project
MX3	Drainage	Section 4	site main drain inspections will be competed to ensure ditches			Hydrologist
	Inspection		and streams are free from debris and blockages that may			
			impede drainage.			



Ref. No.	Reference Heading	Reference Location	Monitoring Measure	Frequency	Reporting Period	Responsibility
MX4	Surface Water Monitoring	SWMP Section 4	Baseline sampling will be completed on at least two occasions and these will coincide with low flow and high flow stream conditions. The high flow sampling event will be undertaken after a period of sustained rainfall, and the low flow event will be undertaken after a dry spell.	Twice	As Required	Project Hydrologist
MX5	Invasive Species	EIAR Section 6 CEMP Section 3	A pre-commencement invasive species survey shall be completed for the site.	Once	As required	Project Ecologist
MX6	Birds	EIAR Section 7	<ul> <li>During the breeding season (March-August) bird monitoring surveys within the Proposed Development site will take place to a distance of 500 m from the development area. However, for the bogs to the west of site, the survey that was carried out in 2022 will be repeated, with transects up to 1,000 m from the edge of the forest. The purpose of the surveys is to confirm the locations of breeding territories prior to construction e to ensure that mitigation is successfully implemented to avoid disturbance effects on breeding activities as a result of the works.</li> <li>It is noted that the wet bog to the southwest and south of the site had not been included in the 2022 survey for health and safety reasons –. The assumption has been made that sensitive breeding species may be present (as habitat is certainly suitable to support same) and a restrictive zone of 500 m from the forest/bog edge will be implemented during the breeding season as a precautionary measure.</li> </ul>	Once	As required	Project Ornithologist



Ref.	Reference	Reference	Monitoring Measure	Frequency	Reporting	Responsibility
No.	Heading	Location			Period	
			The survey for breeding birds on the bog (following Brown and Shepherd 1993) will take place in the April to July period (4 visits) in the season before works, including tree felling, commence. This schedule will provide guidance to the			
			contractor on where restrictive zones are likely to be required.			
			Construction Phase			
MX7	Archaeologica l Monitoring	EIAR Section 13	An archaeologist will monitor excavation works associated with the grid connection cable route and a full photographic record of the bridges will be made by the archaeologist prior to the removal of any components. A report will be complied on completion of the monitoring and sent to the Local Authority and National Monuments Service.	As Required	As Required	Project Archaeologist
MX8	Water Quality and Monitoring	CEMP Section 3 SWMP Section 4	The effectiveness of drainage measures designed to minimise runoff entering works areas and capture and treat silt-laden water from the works areas, will be monitored continuously by the ECoW on-site. The ECoW or Project Hydrologist will respond to changing weather, ground or drainage conditions on the ground as the project proceeds, to ensure the effectiveness of the drainage design is maintained in so far as is possible.	Daily	As Necessary	ECoW
MX9	Water Quality and Monitoring	EIAR Section 9 SWMP Section 4	Daily surface water monitoring forms will be utilised at every works site near any watercourse. These will be taken daily and kept on site for record and inspection.	Daily	As Necessary	ECoW
MX10	Surface Water Quality	CEMP Section 4	Baseline laboratory analysis of a range of parameters with relevant regulatory limits and EQSs will be undertaken as per water monitoring programme for the Proposed Development and each primary watercourse along the route. This will not	As Required	Monthly	ECoW



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Ref.	Reference	Reference	Monitoring Measure	Frequency	Reporting	Responsibility
No.	Heading	Location			Period	
		SWMP	be restricted to just these locations around the proposed			
		Section 4	renewable energy development site with further sampling			
			points added as deemed necessary by the ECoW in			
			consultation with the Project Hydrologist and Site Manager.			
			In-situ field monitoring will be completed on a weekly basis.			
			In-situ field monitoring will also be completed after major			
			rainfall events, i.e. after events of >25mm rainfall in any 24-			
			hour period. The Project Hydrologist will monitor and advise			
			on the readings collected by in-situ field monitoring.			
MX11	Surface water	SWMP	During the construction phase, a field monitoring campaign	Daily	As Necessary	EcOW
	Quality	Section 4	will be undertaken in local streams where construction activity			
	Monitoring		takes place which can affect water quality. This involves a)			
			visual checks of drainage and streams, and b) daily			
			measurements of field parameters temperature, pH, specific			
			electrical conductivity (SEC), alkalinity and turbidity. Field			
			measurements will be taken once a day, upstream and			
			downstream of the construction activity. The field campaign			
			will begin one week prior to activity and cease one week after			
			activity is completed, unless observations dictate that			
			measurements should continue. If visible impact occurs, works			
			will be suspended at the discretion of the supervising			
			engineer, in which case the problem will be identified and			
			corrective action taken before recommencing works. Refer to			
			Section 9.3.13 of the EIAR.			
MX12	Clear felling of		Checking and maintenance of roads and culverts will be on-	As Required	Monthly	ECoW
	Coniferous	EIAR	going through any felling operation. No tracking of vehicle			
	Plantation	Section 9	through watercourses will occur, as vehicles will use road			
			infrastructure and existing watercourse crossing points. Where			
			possible, existing drains will not be disturbed during felling			
			works.			



Ref. No.	Reference Heading	Reference Location	Monitoring Measure	Frequency	Reporting Period	Responsibility		
MX13	Plant and Equipment Inspections	EIAR Section 9 CEMP Section 4	The plant used should be regularly inspected for fuel leaks, unnecessary noise generation and general fitness for purpose.	As Required	Monthly	ECoW		
MX14	Plant and Equipment Inspections	CEMP Section 3	Local areas of the haul route will be condition monitored and maintained, if necessary.DailyMonthly		ECoW			
MX15	Flora and Fauna	CEMP Section 4	<ul> <li>A Project Ecologist will be appointed. The responsibilities and duties of the Project Ecologist will include the following:</li> <li>Undertake a pre-construction transect/walkover bird survey to ensure that significant effects on breeding birds will be avoided.</li> <li>Inform and educate on-site personnel of the ornithological and ecological sensitivities within the Proposed Development area.</li> <li>Oversee management of ornithological and ecological issues during the construction period and advise on ornithological issues as they arise.</li> <li>Provide guidance to contractors to ensure legal compliance with respect to protected species onsite.</li> <li>Liaise with officers of consenting authorities and other relevant bodies with regular updates in relation to construction progress.</li> </ul>	As required	As required	Project Ecologist		
MX16	Noise and Vibration	CEMP Section 4	Monitoring typical levels of noise and vibration during critical periods and at sensitive locations will be carried out.	Daily	Monthly	ECoW		
	Operational Phase							
MX17	Surface Water Quality	SWMP Section 4	Monthly sampling for laboratory analysis for a range of parameters adopted during pre-commencement and	Monthly	Monthly	ECoW		



Ref. No.	Reference Heading	Reference Location	Monitoring Measure	Frequency	Reporting Period	Responsibility	
			construction phases will continue for six months during the operational phase. The Project Hydrologist will monitor and advise on the readings being received from the testing laboratory.				
MX18	Drainage Inspections	SWMP Section 4	The drainage system will be monitored in the operational phase until such a time that all areas that have been reinstated become re-vegetated and the natural drainage regime has been restored.Monthly		Monthly	ECoW	
MX19	Water Levels in Peat	EIAR Section 9	A network of up to 20 no. <b>s</b> tandpipes will be installed for monitoring of water levels in peat along the SAC boundaries. The purpose is to gauge potential effects. The standpipes will be measured manually on a monthly interval and a select set of 5 no. standpipes will be equipped with automatic data loggers for continuous water level measurement. The data will be periodically (quarterly) reviewed to assess whether effects are detected.	Monthly	Quarterly	ECoW/Project Hydrologist	
MX20	Ornithology	EIAR Section 7	Post-construction bird monitoring is required to ensure no adverse effects on bird species as a result of the project. This extends to the site area and the bogs to the west and south- west of the site. The monitoring programme will comprise the following: Flight activity surveys Distribution and abundance surveys within site Distribution and abundance surveys on bog Collision searches Searcher efficiency and predation tests will be carried out at the commencement of the programme in order to calibrate the results to account for the search dog's ability to find bird corpses and to also account for scavenging of corpses by animals.	Years 1, 2, 3, 5	Monthly	Project Ornithologist	



Ref. No.	Reference Heading	Reference Location	Monitoring Measure	Frequency	Reporting Period	Responsibility
			The collision searches will be carried out on a monthly basis in Years 1, 2, 3, & 5 of the operational phase of the wind farm.			
MX21	Bats	EIAR Section 6	<u>Bat Monitoring Plan</u> Post-construction bat monitoring will be undertaken for at least three years' post construction of the renewable energy development. The monitoring will also include static detector surveys, walked survey transects and corpse searching to record any bat fatalities resulting from collision. The results of post construction monitoring shall be utilised to assess changes in bat activity patterns and to inform the design of any advanced site specified mitigation requirements, including curtailment if deemed necessary following post construction monitoring.	Years 1, 2, 3	Annually	Project Ecologist
MX22	Flora and Fauna	EIAR Section 6	The Proposed Development has the potential to result in enhancement of the surrounding areas through habitat rehabilitation management (as described in the Biodiversity Management and Enhancement Plan) that will be implemented during the construction phase of the Proposed Development and maintained during the operational phase. Details of the management that will be undertaken are provided in the Biodiversity Management and Enhancement Plan in Appendix 6-4 of the EIAR. These include: Drain blocking within degraded peatlands Surface Peat Assessments Vegetation Sampling Hydrological Monitoring	As required	As required	Project Ecologist



Ref.	Reference	Reference	Monitoring Measure	Frequency	Reporting	Responsibility			
No.	Heading	Location			Period				
	Decommissioning Phase								
MX23	Decommission	DP Section 3	The Site Manager in consultation with the ECoW will be	As required	As required	Site Manager			
	ing		responsible for employing the services of a suitably qualified						
			ecologist and any other suitably qualified professionals as						
			required throughout the decommissioning works.						
MX24	Decommission	DP Section 3	Prior to decommissioning, a suitably qualified ecologist will	As required	As required	Project Ecologist			
	ing		complete an invasive species survey of any material proposed						
			for use as part of foundation backfilling. The invasive species						
			survey will also be undertaken along the cable route to						
			identify invasive species at joint bay locations where						
			excavation to expose the cabling for removal will be required.						



## 8. **PROGRAM OF WORKS**

#### 8.1 **Construction Schedule**

The construction phase will take approximately 18 - 24 months to complete from starting on site to the commissioning of the electrical system and export of electricity from site.

The EIAR stipulated that in the interest of breeding birds, construction would not commence during the breeding bird season, which runs from March to August. The EIAR also stipulated that the removal of conifers (forestry) by felling will take place between the 1st of September and the end of February, thus avoiding the period from the 1st of March to the 31st of August inclusive, as prescribed in the Wildlife Acts.

Works during the construction phase of the development, including delivery of construction materials will generally take place between 7 a.m. and 7 p.m. daily Monday to Friday and 7 a.m. to 2 p.m. on Saturdays, with large concrete pours requiring an earlier start when deemed necessary. Delivery of abnormal loads such as turbine tower sections and blades will take place at night outside of peak traffic hours.

The phasing and scheduling of the main construction task items are outlined in Figure 8-1 below, where  $1^{st}$  January has been selected as an arbitrary start date for construction activities.

Ш	Task Name	Task Description	Q1 202	3 Q2 2028	Q3 2028	Q4 2028	Q1 2029	Q2 2029	Q3 2029
1	Site Health and Salty								
2	Site Compounds	Site Compounds, site access, fencing, gates							
3	Site Roads	Construction/upgrade of roads, construct underpasses install drainage measures, install water protection measures							
4	Turbine Hardstands	Excavate/pile for turbine bases where required							
5	Turbine Foundations	Fix reinforcing steel and anchorage system, erect shuttering, concrete pour							
6	Substation Construction and Electrical Works	Construct substation, underground cabling, grid connection							
7	Backfilling and Landscaping								
8	Turbine Delivery and Erection		-						
9	Substation Commissioning								
10	Turbine Commisioning								

Figure 8-1 Indicative Construction Schedule



## 9. COMPLIANCE AND REVIEW

#### 9.1 Site Inspections and Environmental Monitoring

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

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

## 9.2 Auditing

The Contractor will be responsible for implementing the mitigation and monitoring measures specified throughout the EIAR and compiled in Sections 6 and 7 of this CEMP. The Contractor will also be responsible for ensuring that all construction staff understand the importance of implementing the mitigation measures. The implementation of the mitigation measures will be overseen by the environmental clerk of works or supervising hydrogeologists, environmental scientists, ecologists or geotechnical engineers, depending on who is best placed to advise on the implementation.

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

## 9.3 Environmental Compliance

The following definitions shall apply in relation to the classification of Environmental Occurrences during construction of the proposed renewable energy development:

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

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

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

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

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

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



#### 9.4 **Corrective Action Procedure**

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

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

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

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

### 9.5 **Construction Phase Review**

This CEMP will be updated and reviewed prior to commencement of construction, and also every six months thereafter during the construction phase of the project and will comply with the measures set out in the NIS, EIAR and any planning conditions.