

Appendix 1-4 – Consultation Responses



From: John Staunton
Sent: Friday 25 June 2021 09:25
To: Anita Donaghy
Cc: Oonagh Duggan
Subject: RE: Letter Ref 10798
Attachments: Figure_1.4 Site Layout.pdf

Hi Anita,

Many thanks for the email. Please see attached our latest map in higher resolution. I hope this is of use to you. Please let me know if you have any further queries.

Kind regards,

John

Dr. John Staunton B.Sc. PhD.
Senior Project Manager & Environmental Scientist

TOBIN Consulting Engineers
Website: <http://www.tobin.ie>



2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)
2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year
2018 Engineers Ireland Excellence Awards Winner: Heritage and Conservation
2017 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Innovation)
2017 KPMG Property Industry Excellence Awards Winner: Community Benefit Project of the Year

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From: Anita Donaghy <adonaghy@birdwatchireland.ie>
Sent: Friday 25 June 2021 09:13
To: John Staunton <john.staunton@tobin.ie>
Cc: Oonagh Duggan <oduggan@birdwatchireland.ie>
Subject: Letter Ref 10798

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Dear Mr Staunton

Thank you for your letter of 21st June (Ref 10798) regarding the Cloghercor wind farm proposal. Before we submit any comments, please could you send us a detailed map of the proposed location of the turbines and any associated works?

Many thanks

Anita

Dr Anita Donaghy
Species and Land Management
BirdWatch Ireland
Cedarwood House
Carnamuggah Upper
Letterkenny
Co Donegal
F92 Y38C

www.birdwatchireland.ie

Please note that due to current Covid-19 restrictions most BirdWatch Ireland Staff will be working from their homes until 19th April. Please be assured that your email will be answered as soon as possible.

BirdWatch Ireland is the trading name of the Irish Wildbird Conservancy. Cairde Éanlaith Éireann. Registered in Ireland, Company Number 116468. Registered Charity Number 5703.

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From: Simon Dolan <Simon.Dolan@housing.gov.ie>
Sent: Monday 28 June 2021 11:26
To: John Staunton
Subject: Cloghercor Wind farm Development,

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. Forward unusual emails to spam@tobin.ie for verification.

Our Ref: G Pre00189/2021 (Please quote in all related correspondence)

A Chara

I acknowledge receipt of your recent consultation.

In the event of observations, you will receive a co-ordinated heritage-related response by email from Development Applications Unit (DAU).

The normal target turnaround for pre-planning and other general consultations is six weeks from date of receipt. In relation to general consultations from public bodies under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 to 2011, the Department endeavours to meet deadline dates, where requested.

If you have not heard from DAU and wish to receive an update, please email manager.dau@housing.gov.ie.

Simon Dolan

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachtá
Department of Housing, Local Government and Heritage
Executive Officer

Aonad na nIarratas ar Fhorbairt
Development Applications Unit

Oifigí an Rialtais
Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

Is faoi rún agus chun úsáide an té nó an aonán atá luaite leis, a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bhainisteoir an chórais.

Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphost seo scuabtha le bogearraí frithvíorais chun víorais ríomhaire a aimsiú.

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From: Manager DAU <Manager.DAU@housing.gov.ie>
Sent: Wednesday 23 June 2021 16:52
To: John Staunton
Subject: DAU Ref: G Pre00186/2021 RE: 10798 - Cloghercor Wind Farm - Scoping Document

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Our Ref: G Pre00186/2021 (Please quote in all related correspondence)

A Chara

On behalf of the Department I acknowledge receipt of your recent consultation.

In the event of observations, you will receive a co-ordinated heritage-related response by email from Development Applications Unit (DAU) on behalf of the Department.

The normal target turnaround for pre-planning and other general consultations is six weeks from date of receipt. In relation to general consultations from public bodies under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 to 2011, the Department endeavours to meet deadline dates, where requested.

If you have not heard from DAU and wish to receive an update, please email manager.dau@housing.gov.ie.

Kind Regards
Sinéad

Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90
Newtown Road, Wexford, County Wexford Y35 AP90

From: John Staunton [mailto:john.staunton@tobin.ie]
Sent: Tuesday 22 June 2021 18:23
To: Manager DAU <Manager.DAU@housing.gov.ie>
Subject: 10798 - Cloghercor Wind Farm - Scoping Document

Dear Sir/Madam,

Please see cover letter and EIAR scoping document attached for the proposed Cloghercor Wind Farm, Co. Donegal.

If you have any comments on the document please let me know.

Kind regards,

John

Dr. John Staunton B.Sc. PhD.
Senior Project Manager & Environmental Scientist

TOBIN Consulting Engineers
Website: <http://www.tobin.ie>



- 2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)*
- 2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year*
- 2018 Engineers Ireland Excellence Awards Winner: Heritage and Conservation*
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Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphoist seo scuabtha le bogearraí frithvíorais chun víorais ríomhaire a aimsiú.

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Your Ref: **Cloghercor Wind Farm**

Our Ref: **G Pre00186/2021** (Please quote in all related correspondence)

24 August 2021

Tobin Consulting Engineers
Block 10-4
Blanchardstown Corporate Park
Dublin 15

Via email: john.staunton@tobin.ie

Re: Cloghercor Wind Farm Limited - EIA scoping for the proposed Cloghercor Wind Farm - 23 no. wind turbines within a site that extends to approximately 1,962 hectares (ha) of which approximately 299 ha is commercial forest, owned by Coillte and the remaining area is third party property: near Doochary village, County Donegal

A chara

I refer to your pre-planning correspondence received on 23rd June in connection with the above proposed development.

Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

The Department welcomes the opportunity to provide observations at this early stage. These observations are intended to assist you in meeting the obligations that may arise in relation to European sites, biodiversity and environmental protection in general in the context of the current application.

The Department has significant concerns regarding the proposed project, due to the presence of sensitive ecological receptors within and or within close proximity to the proposed development site.



The Departments concerns are at this early stage focused on three significant risks to nature conservation arising from the proposed project.

1. Potential impacts to Golden Plover and Merlin populations, a qualifying interest of the Derryveagh and Glendowan Mountains Special Protection Area (SPA) (site code 004039) located <3km distant.
2. Potential impacts to a significant proportion of the national population of breeding Golden Eagle (Annex I Birds Directive species).
3. Potential impacts to Salmon and potentially Fresh Water Pearl Mussel, a qualifying interest for the West of Ardara/Mass road SAC (002301).

1: With regard to impacts to Merlin and Golden Plover populations supporting the Derryveagh and Glendowan Mountains SPA (004039).

The Department suggests that the bird survey areas should be based on the Scottish Natural Heritage guidance (2014) for estimated buffer zones and adopt a 2-4 km turbine buffer for breeding raptors (e.g. Merlin) with an additional 6 km turbine buffer for breeding eagles. This rationale acknowledges the broad zone of influence or likely impact range for wind farm development on raptor species. However, the range of the SNH buffers were selected to broadly determine potential impacts at scales which are likely to influence breeding performance, habitat and nest site selection of a wide range of raptors. In this case, specific considerations need to be given to Merlin because the home range size of breeding Merlin in Western Europe are relatively unknown (Lusby et al., 2017). In Ireland, the 2018 Merlin SPAs Survey (coordinated by Lusby, J.), recorded that the mean distance between Merlin pairs in the Connemara Bog Complex SPA population was 3.2 km, which was comparable to previous estimates for Merlin in Ireland (Lusby et al., 2010). Furthermore, Norriss *et al.* (2010) recorded the mean nearest neighbour distance; which ranged from 2.72 to 5.86 km in five areas where the Merlin population was assessed. Similarly, in Scotland active territories across years that were within 3.5 km of one another were defined as the same territory (Rebecca et al., 1992). This published literature indicates that Merlin territories in Ireland can range from approx. 2km – 6km in scale. In this case, Merlin are an SCI species for the Derryveagh and Glendowan Mountains SPA located in close proximity to the proposed development (<3km).

Likewise, a breeding pair of this species is likely to be vulnerable to aerial noise and visual disturbance at the construction and operational stage of the proposed development. The Department emphasises that collision risk model outputs are only considered to be indicative of the level of risk of fatalities resulting from a proposed wind farm site, and should be considered in conjunction with other discussions within the Avi-fauna section in the Biodiversity Chapter of the EIAR. For instance, the outputs from the model do not take account of potential displacement of birds from the wind farm envelope, which for species



breeding within or directly adjacent to the site may be more of a cause for concern, e.g. merlin or eagle. It is also widely acknowledged that the application of CRMs to smaller, evasive species like merlin may not provide an accurate estimate of collision risk, as these species can be difficult to detect over the full extent of the viewsheds for VPs, due to diminutive size, cryptic nature and/or flight behaviour’.

Merlin are undergoing declines in population in Ireland (Lusby et al., 2011) with an estimated population of less than 200 pairs (Lusby et al., 2017). There is also a limited understanding of the ecological requirements of the species, factors which impact on the population (Lusby et al., 2011). Within this context, the Department adopts a similar stance to NatureScot when assessing impacts to Annex I raptor species and the Department expects developers to devise turbine layouts that avoid the core foraging ranges around recorded nest sites of such species (e.g. Merlin, Eagle). This is particularly important when nest sites are within 6km of European sites for which they are a qualifying Interest/ SCI. In this case the proposed project is within 3km of one of Europe’s most important sites for Merlin (range 6-11 pairs). Where this is not possible, the Department expects the developer to provide a clear, full justification for why this is the case, and appropriate long term measures to address this. The Department also expects that none of the habitat management measures proposed should in their own right adversely affect the viability of the relevant raptor populations or of other sensitive bird species.

References:

- Lusby, John & Corkery, Ilse & Mc Guinness, Shane & Fernández-Bellon, Darío & Toal, Larry & Norriss, David & Breen, Dermot & O’Donnell, Aonghus & Clarke, Damian & Irwin, Sandra & Quinn, John & O’Halloran, John. (2017). *Breeding ecology and habitat selection of Merlin Falco columbarius in forested landscapes. Bird Study. 64. 10.1080/00063657.2017.1408565.*
- Scottish Natural Heritage (2014). Recommended Bird Survey Methods to Inform Impact Assessment of Onshore Wind Farms. SNH Guidance Note (2014 update), SNH.
- Norriss, D.W., Haran, B., Hennigan, J., McElheron, A., McLaughlin, D.J., Swan, V. & Walsh, A. 2010. *Breeding biology of Merlins Falco columbarius in Ireland, 1986–1992. Irish Birds 9: 23–30*
- Lusby, J., Fernández-Bellon, D., Norriss, D., & Lauder, A. 2011. *Assessing the effectiveness of monitoring methods for Merlin Falco columbarius in Ireland: the Pilot Merlin Survey 2010. Irish Birds 9: 143–154.*
- Rebecca, G.W., Cosnette, B.L., Hardy, J.J.C. & Payne, A.G. 1992. *Status, distribution and breeding biology of the Merlin in Northeast Scotland, 1980–1989. Scot. Birds 16: 165–183.*

With regard to impacts to Golden Plover

The Department has concerns regarding risks associated with the proposed project to breeding Golden plover.

The Departments last [Article 12 submission](#) to the European Commission listed <100 breeding pairs of Golden Plover in Ireland. This Annex 1 listed species has undergone a



severe decline in recent decades (circa 83% since the early 1970s) and therefore is red listed under BWI & RSPB NI's BOCCI list. The above is a sufficient basis to say that these breeding populations are of high importance in terms of Irish and International bird conservation. This publically available information should provide a useful basis to inform the assessment of the impact of the development on these bird populations. The NIS should assess potential connectivity with and impacts to the Derryveagh and Glendowan Mountains SPA (004039) for which Golden Plover are an SCI. The EIAR should assess risks to the national population and the NIS should also assess risks flowing from this assessment to the potential for SPA sites locally, regionally and nationally to meet their conservation objectives.

2: With regard to potential impacts to a significant proportion of the national population of Annex I (Birds Directive) breeding Golden Eagle.

The Department highlights that these large raptors have low fecundity and as a result even low rates of mortality are likely to result in effects at the national population level. Eagle species are classed as High sensitivity to wind farm developments and avoidance behaviour leading to displacement should be considered in light of best scientific knowledge in the field within the EIAR. The Department highlights that EIA is a scientific process and conclusions must be supported by scientific evidence from data collected during surveys and or peer reviewed literature. Furthermore, the Department notes that outputs from a Collision risk model do not take account of potential displacement of birds from the wind farm envelope, which for species breeding within or adjacent to the site may be more of a cause for concern. Indeed, the Department is aware of a Golden eagle nest site located within 2km of the development site. Until the bird surveys are complete it is difficult to determine the import of the proposed development site for the pair, but it is likely that the development site forms an integral part of the home range /core territory of the pair nesting in such close proximity. This pair constitutes approx. 20% of the national breeding population of this Annex I species and it follows that potential impacts to this breeding pair, must be considered to constitute a potential impact to the national population.

3: Potential impacts to water quality leading to impacts to Fresh Water Pearl Mussel and or Salmon in the West of Ardara/Mass road SAC (002301).

The Department notes that the proposed development site is hydrologically connected to the West of Ardara/Maas Road SAC.

The Department also notes that the proposed development will require the felling of forestry and excavation of peat and topsoil substrates in order to facilitate the construction of the turbine bases, surrounding hard-standing and access roads. The Department recommends that a comprehensive assessment of effects arising from peat slippage events is undertaken and referenced in the NIS and EIAR. The Department highlights the effects of the recent Meenbog Peat Slippage on the River Finn SAC, the River Foyle and Tributaries SAC at considerable distance (>60km). This event indicates that dilution over



distance is not an adequate mitigation technique for preventing impacts to water quality and or habitat deterioration for Salmon. Likewise, streams located upslope of the West of Ardara/Maas Road SAC, are likely to represent important spawning habitat for the populations of salmon that support the downstream European site. On this basis these watercourses, should be considered to be highly sensitive to effects arising as a result of the proposed development.

In summary, the potential risks to Salmon and potentially FWPM associated with project are very high. Potential impacts to FWPM are irreversible and permanent. FWPM are currently classified as in unfavourable condition in West of Ardara/Maas Road SAC due to a combination of compounding pressures (e.g. eutrophication from forestry and effluent as well as silt laden waters resulting from development in upland peaty based sites). The Department is concerned that in combination and or cumulative effects arising from the project will result in adverse impacts to the European sites ability to meet its conservation objectives.

General Comments

The Department notes that maxima sizes not specific sizes are used in the assessment of impacts to nature conservation and highlights the recent judicial review regarding this practice¹.

The NIS should not contain substantial cross referencing to the EIAR this is because EIA and AA are separate assessment processes designed to address independent risks and subjects. Cross referencing should be omitted and overlapping elements of the CEMP and or EIAR should be included within the NIS text or as appendices.

The Department highlights that NPWS has no post consent role and references to liaison and or consultation with NPWS do not constitute mitigation and do not address risks arising to Qualifying Interest species and or habitats that support European sites.

Mitigation must be concise, sufficiently detailed to ensure no adverse impacts occur and proven to be effective (i.e. the efficacy of experimental methods or techniques can only be assessed post competition and their outcome is uncertain).

All stages of a project including the decommissioning must be assessed in the NIS to inform the AA which must contain complete and concise information on the long term effects and impacts of the development.

¹ **Sweetman v APB [2021] IEHC 390 (High Court (Judicial Review), Humphreys J, 16 June 2021)**



The Department emphasises that the level of detail provided in the NIS must eliminate reasonable scientific doubt as to the absence of effects² to QI and or SCI species for European sites. Moreover, the NIS should be conducted following the Department of the Environment, Heritage and Local Government guidance 'Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities' (DoEHLG, 2010). As stated in that guidance document, the requirement of the AA is not to prove what the impacts and effects will be, but rather to establish beyond reasonable scientific doubt that adverse effects on site integrity will or will not result.

In summary, based on the information supplied, the Department cannot provide a definitive degree of risk but considering what is currently known, NPWS and the Department have significant concerns regarding the proposed development. This is because the Department is of the view that national and European level populations of threatened birds as well as several European sites are at risk from the development.

Finally, the Department highlights that case law indicates that an appropriate assessment (and by implication an NIS) must examine the implications of the project for the QIs, or the SCIs, of the European site concerned, in view of the site's conservation objectives and in light of the best scientific knowledge in the field³. The assessment cannot have lacunae or gaps, and must contain complete, precise and definitive findings and conclusions⁴. Competent authorities can authorise a plan or project only if they have made certain that it will not adversely affect the integrity of a European site. This is so when there is no reasonable scientific doubt as to the absence of such effects⁵.

² Case 243/15 *Lesoochránárske zoskupenie VLK v. Obvodný úrad Trenčín* EU:C:2016:838

³ Case 127/02 *Landelijke Vereniging tot Behoud van de Waddenzee and Nederlandse Vereniging tot Bescherming van Vogels v. Staatssecretaris van Landbouw, Natuurbeheer en Visserij* EU:C:2004:482

⁴ Case 521/12 *T.C. Briels v. Minister van Infrastructuur en Milieu* EU:C:2014:330

⁵ Case 243/15 *Lesoochránárske zoskupenie VLK v. Obvodný úrad Trenčín* EU:C:2016:838



You are requested to send further communications to the Development Applications Unit (DAU) at manager.dau@housing.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

A handwritten signature in black ink, which appears to read "Diarmuid Buttiner", is positioned above the printed name.

Diarmuid Buttiner
Development Applications Unit



John Staunton
Senior Project Manager and Environmental Scientist
Tobin Consulting Engineers

23rd June 2021

Re:
Proposed Development of Cloghercor Windfarm, Co. Donegal.

Dear Mr. Staunton,

I refer to your letter dated 21st June 2021, informing us of your intention to develop Cloghercor Windfarm, near Doochary Village, Co. Donegal.

As a matter of practice, the Department of Defence does not provide any observations or advice in the Pre- planning process, except where the relevant parties have been directed by a planning authority to seek the Department's views.

The Minister for Defence reserves the right to comment on an actual planning application as and when it is submitted in accordance with the provisions of the planning regulatory code.

Please contact me if you have any queries in this regard.

Yours faithfully,

Sent via e-mail due to Covid19 restrictions

Don Watchorn
Property Management Branch
Department of Defence
Station Road
Newbridge
Co. Kildare W12 AD93

From: GCU - Reform Communications and Emergency Planning Divisional Mailbox
<GeneralCo-OrdinationUnit@transport.gov.ie>
Sent: Thursday 7 October 2021 15:52
To: John Staunton
Subject: Contact details for Department of Transport

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Good afternoon,

Thank you for your recent correspondence in relation to the Proposed Development of Cloghercor Wind Farm, Co. Donegal.

Unfortunately, we have been working remotely for the past number of months with limited access to the office and were unable to respond to your request.

It would be appreciated if you could forward any future correspondence via email to gcu@transport.gov.ie

Kind regards
Jacqui

Jacqui Traynor
Reform Communications Emergency Planning

An Roinn Iompair
Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60

www.gov.ie/transport

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

Tá ár Ráiteas Príobháideachta le fáil ar www.transport.gov.ie

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Donegal Airport, Carrickfinn, Kincasslagh, Co. Donegal.
30th June 2021

Mr. John Staunton
Senior Project Manager and
Environmental Scientist
Tobin Consulting Engineers
(on behalf of Cloghercor Wind Farm Ltd)

Dear Mr. Staunton

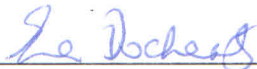
Thank you for the Scoping Report forwarded to us in relation to the proposed Cloghercor wind farm development.

As the development is located within a 15NM circle of the airport, Cloghercor Wind Farm Limited will be required to complete an assessment of any impact the proposed development might have on the current and future Flight Instrument Procedures at the airport.

This assessment needs to be completed by one of the Instrument Flight Procedure Design Companies approved by the Irish Aviation Authority and all costs for the assessment to be borne by Cloghercor Wind Farm Limited.

If you require any further information in this regard please contact us further.

Yours sincerely



Eilís Docherty
Managing Director



John Staunton
Tobin Consulting Engineers
Fairgreen House
Fairgreen Road
Galway
H91 AXK8

23 July 2021

Re: Proposed Development of Cloghercor Wind Farm, Co. Donegal
Your Ref: 10798
Our Ref: 21/231

Dear John,

Geological Survey Ireland is the national earth science organisation and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your email received on the 22 June 2021, concerning the proposed development of Cloghercor Wind Farm, Co. Donegal, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter provides more detail on some of these datasets, with particular reference to the proposed development site.

Geoheritage

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

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

The audit for Co. Donegal was carried out in 2020. The full report details can be found [here](#). **Our records show that there are no CGSs in the vicinity of the proposed wind farm.**

Groundwater

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our [Map viewer](#), which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels ([gwlevel.ie](#)).



Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.

The Groundwater Data Viewer indicates an aquifer classed as a 'Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones', underlies the proposed wind farm development. The Groundwater Vulnerability map indicates the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.

The Groundwater Protection Response overview and link to the main report is here: <https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx>

Geological Mapping

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data, which can be found [here](#), in your future assessments.

Geotechnical Database Resources

Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised and can be accessed through downloads from our [Geotechnical Map Viewer](#). We would encourage the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas. This information may be beneficial and cost saving for any site-specific investigations that may be designed as part of the project.

Geohazards

Landslides are common in areas of peat, rock near surface and in fine to coarse range materials (such as glacial tills), areas which are found within the proposed wind farm area. Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated [Map Viewer](#). Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.

The Landslide Susceptibility map indicates the area covered is variable, and **includes both 'Moderately High' and 'High' landslide susceptibility**. We would therefore recommend use of the Landslides Viewer to identify areas of 'Moderately High' to 'High' susceptibility in your assessments.

Natural Resources (Minerals/Aggregates)

Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#).

The Aggregate Potential map viewer indicates the area covered is variable, and includes both 'High' and 'Very High' aggregate potential. We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed Cloghercor Wind Farm are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.



Geochemistry of soils, surface waters and sediments

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx>. This page also hosts Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and litho-geochemistry (rock geochemistry) from southeast Ireland datasets. Geological Survey Ireland and partners are undertaking applied geochemistry projects to provide data for agriculture ([Terra Soil](#)), waste soil characterisation ([Geochemically Appropriate Levels for Soil Recovery Facilities](#)) and mineral exploration ([Mineral Prospectivity Mapping](#)).

Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to Beatriz Mozo, Geological Mapping Unit, at Beatriz.Mozo@gsi.ie, 01-678 2795.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Clare Glanville
Senior Geologist
Geological Survey Ireland

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes
following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018
(S.I. No. 296 of 2018)

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Radon Map	Land & Soils/Air	National		http://www.epa.ie/radiation/radonmap/
Geoheritage	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fbd2aaac3c228
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a420f54877843aca1bc075c62b
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	Includes 3D models	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c6093beb2212a850ce6&scale=0
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	https://secure.dcaa.gov.ie/goldmine/index.html
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turf/rough water levels (gwlevel.ie)	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9eae46bee08de41278b90a9916d0c0b9e
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		http://www.cherishproject.eu/en/
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water / Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Active quarries	Land & Soils	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	https://gis.epa.ie/EPAMaps/default?zesting=7&northing=7&lid=EPA:LEMA_Facilities_Extractive_Facilities https://www.epa.ie/enforcement/mines/
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional		https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754

- Notes:
- The maps and data listed above are available on the Geological Survey Ireland map viewer <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>
 - Please read all disclaimers carefully when using Geological Survey Ireland data
 - Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.

From: Planning <planning@iaa.ie>
Sent: Monday 28 June 2021 11:51
To: John Staunton
Subject: Cloghercor Wind Farm Ref:10798

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. Forward unusual emails to spam@tobin.ie for verification.

Dear John

The Irish Aviation Authority (IAA) Air Navigation Services Division (ANSD) does not get involved in the planning process. The IAA ANSD is to be notified as detailed hereafter:

According to [S.I. 215 of 2005, Irish Aviation Authority \(Obstacles to Aircraft in Flight\)](#), the IAA ANSD requires any person who seeks to erect a manmade object to notify the aerodrome operator of the intended operation **at least thirty days** in advance if the structure is to be erected in the vicinity of the aerodrome or the areas around the aerodrome and other protected surfaces associated with the aerodrome. Aerodrome Operators can be contacted via [IAA AIP AD 1.3 INDEX TO AERODROMES AND HELIPORTS](#), to evaluate the impact of the intended operation on the protected airspace established for the aerodrome.

Additionally, any person who seeks to erect a manmade object in excess of 45 metres anywhere within the state above ground or water surface level must also notify the IAA ANSD of the intended crane erection **at least thirty days** in advance, as a crane operating at or above this height may constitute an obstacle to air navigation. The IAA ANSD can be contacted via airspace@iaa.ie.

The State requires electronic terrain and obstacle data (eTOD) in accordance with International Civil Aviation Organisation (ICAO) [Annex 15](#) requirements which shall be surveyed by [Ordnance Survey Ireland \(OSi\)](#). The cost of this OSi surveyed data is to be borne by the developer. Additionally, the following data is to be supplied once construction is planned or commenced or available to the airspace team via airspace@iaa.ie:

- The WGS84 coordinates (In degrees, minutes and seconds) for each turbine?
- Height above ground level (to blade tip) and elevation above mean sea level (to blade tip)?
- Verification if it's a standalone wind farm or is merged with others. Does the wind farm have any alternative names?
- Horizontal extent (rotor diameter) of turbines and blade length where applicable?
- Lighting of the wind farm, which turbine(s) is/are lit, and what type of lighting?

ICAO Light Type	Colour
Low-intensity Type A (fixed obstacle)	Red
Low-intensity Type B (fixed obstacle)	Red
Low-intensity Type C (mobile obstacle)	Yellow/Blue
Low-intensity Type D (follow-me vehicle)	Yellow
Low-intensity Type E	Red
Medium-intensity Type A	White
Medium-intensity Type B	Red
Medium-intensity Type C	Red

High-intensity Type A	White
High-intensity Type B	White

If you have any questions, please don't hesitate to contact the airspace team at airspace@iaa.ie.

Kind regards,

Audrey Rafferty
Corporate Affairs
Irish Aviation Authority
11-12 Dolier Street
Dublin 2
01 603 1103

=====
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The Times Building
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Dublin 2, D02 T449,
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Údarás Eitlíochta na hÉireann
Foigrneamh na hAmanna
11-12 Sráid D'Olier
Baile Átha Cliath 2, D02 T449,
Éire

T: +353 1 671 8655
F: +353 1 679 2934



29th June 2021

Ms. Louise Byrne
Tobin Consulting Engineers
Block 10-4 Blanchardstown
Corporate Park
Dublin 15



Development: It is proposed that the Cloghercor Wind Farm will be built within a site that extends to approximately 1,962 hectares (ha) of which approximately 299 ha is commercial forest, owned by Coillte and the remaining area is third party property. It is currently proposed that up to 23 no. wind turbines will be located across the proposed wind farm site at Doochary village, County Donegal. Ref: 10798

Dear Mr. Staunton,

Thank you for your email in relation to the EIA Scoping for the proposed Cloghercor Wind Farm to consist of 23 no. wind turbines located near Doochary village, County Donegal.

The IAA's Safety Regulation Division, with regard to aerodromes, notes that these turbines are to be sited approximately 20kms to the South East of Donegal Airport. As such, the developer / applicant should engage with Donegal Airport to undertake a preliminary screening assessment (incorporating the utilisation of any cranes necessitated during construction) with regard to the potential impact on Donegal Airport's flight procedures and communication, navigation and surveillance equipment.

In the event of a formal planning application, the IAA will likely require that the applicant should be conditioned to contact the IAA to:

- (1) agree an aeronautical obstacle warning light scheme for the wind farm development,
- (2) provide as-constructed coordinates in WGS-84 format together with ground and tip height elevations at each wind turbine location

Turbine No.	WGS-84 Co-ordinates	Ground elevation (Malin Head OD)	Blade tip elevation of turbine (Malin Head OD)	Height of turbine (height from ground level to blade tip)	Confirm if turbine has obstacle lighting.
T1	53.346125, -6.258288	75m	225m	150m	No

- (3) notify Donegal Airport and the Authority of the intention to commence crane operations with at least 30 days prior notification of the erection.

Bord Stúirthóirí/Board of Directors

Rose Hynes (Cathaoirleach/Chairman),
Peter Kearney (Príomhfeidhmeannach/Chief Executive)
Cian Blackwell, Marie Bradley, Ernie Donnelly,
Gerry Lumsden, Joan McGrath, Diarmuid Ó Conghaile,
Eimer O'Rourke

Oifig Chláraithe:

Foigrneamh na hAmanna, 11-12 Sráid D'Olier
Baile Átha Cliath 2, D02 T449, Éire
Uimhir Chláraithe: 211082. Áit Chláraithe: Éire
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Your correspondence has been passed to other relevant domains within the Authority, i.e. Engineering and Airspace and they may furnish further observations separately to you in due course.

Yours sincerely

pp: 

Deirdre Forrest
Corporate Affairs

From: Brendan Maguire <Brendan.Maguire@fisheriesireland.ie>
Sent: Friday 23 July 2021 12:01
To: John Staunton
Subject: Emailing: windfarm at Cloghercor
Attachments: windfarm.doc

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Morning John

This is something I use as a basis on windfarm development and I amend as needed in accordance with any application forwarded into planning by a developer. Site specifics naturally will come into play, but this should give you an idea of where we will be coming from. Pretty standard requirements, but as I have stated this can be amended to suit the site and the proposal.

Kind Regards

Brendan Maguire

Your message is ready to be sent with the following file or link attachments:

windfarm

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Should for any reason, oil or fuel be stored in the area it must be kept in a bunded area (providing 110% capacity of the largest stored unit), 100m from any watercourse with appears on an 6" O.S. map of the site. Vehicle maintenance should not occur with 100m of any watercourse and all machinery must be in good working order, free from leakage of fuel or hydraulic fluid.

Roadside drains should not intercept large volumes of water from ground above. Any watercourse, however small that is intercepted by the access routes should be bridged or culverted at that point. The use of fords must be avoided. Culverts should be of a size sufficient to avoid overloading, blocking or washout. The profile of any stream that is crossed must remain the same and any fish movement remain unhindered. Shooting velocities must be avoided. Floating roads must be considered where any peat encountered is one metre or more in depth. Turbine bases at deep peat locations should be piled and these bases should be a minimum 50 metres from watercourses. This separation distance must be increased where fisheries sensitive waters occur.

Erosion of roadside embankments and cuttings should be avoided by using intercepting trenches or terracing. Embankments and cuttings should be kept at no greater slope than the normal angle of repose to encourage re-vegetation, otherwise added stabilisation may be required. It is essential that silt traps and settlement ponds are utilised and are capable of settling out materials prior to discharge off site. These ponds must take into account high precipitation events and designed accordingly, incorporating other treatment measures where necessary. The traps and ponds must be regularly inspected and maintained accordingly.

Existing drainage channels should remain untouched. During the construction period cement and wet concrete must be kept out of all watercourses and drains. Concrete trucks must not wash out on site. These materials are extremely toxic to aquatic life and the construction team must be made fully aware of this. This will be especially important during the construction of the turbine bases.

Track ruttings by machinery movement must be kept to a minimum and no discharge or run off containing high sediment loads must occur from the site. In this regard a contingency plan should be established and strictly adhered to. Any stockpiling of peat or other site materials will require careful management to ensure that slippage or collapse to any adjacent watercourses will not occur. A construction methodology is recommended prior to any works commencing with a view to, among others, minimising the volumes of excavation that will be required.

Consideration should be afforded to the likely increase in surface water flow from the site which has the potential to alter the downstream prevailing hydrological regime and impact on the fisheries resource. In this regard attenuation measures should be identified and implemented in the surface water drainage arrangements.

The monitoring of all surface flows during construction is essential and remote sensing equipment should be considered as a normal precaution and extended into the post construction phase.

. It would be recommended that a suitably qualified person be on site for the duration of works to ensure:

- (a)** All mitigation measures identified are implemented prior to commencement of works.
- (b)** Continual assessment to ensure the mitigation measures are effective including assessment of adjacent peats for cracking/instability.
- (c)** Cessation of works should slippage indicators develop and/or settlement arrangements are inadequate for suspended solid removal in surface waters.
- (d)** Peat reinstatement is completed according to a detailed restoration plan.
- (e)** Arrangements are established in relation to a contact protocol of relevant statutory bodies on progress of works.



Iascach Iníre Éireann
Inland Fisheries Ireland

6th of October 2022

TOBIN Consulting Engineers
Galway Office Fairgreen House,
Fairgreen Road,
Galway,
H91 AXK8,
Ireland.

Re: Proposed wind farm, Cloghercor Co. Donegal.

Dear John,

Inland Fisheries Ireland is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the protection, management, and conservation of the inland fisheries resource

In relation to the above development, the following comments are of relevance:

Introduction:

The Gweebarra River catchment is located in north County Donegal within the North Western River Basin District and covers an area of approx. 122 km². The River Barra rises between the Glendowan and Derryveagh mountains and flows for approximately 32km in a southwesterly direction through Lough Barra. The Gweebarra River flows out of Lough Barra and continues in a southwesterly direction through the village of Doocharry and meets the sea at Gweebarra Bay. The main tributaries are the Owenwee, Cloghernagore and Croagheen rivers. The catchment has one relatively large lake present, Lough Barra. This is a spate river and includes 16km of estuarine water. This catchment's geology is mixed between granite, slate, shale and schist, with rough pasture and blanket bog as the dominant land uses. The river receives a good run of salmon and sea trout and is well regarded as an angling river. A large proportion of the upper catchment forms part of the Cloghernagore Bog and Glenveagh National Park Special Area of Conservation (SAC) while the lower part of the catchment is situated within the West of Ardara/Maas Road SAC.



The Gweebarra catchment area and the surrounding SAC provide prestige habitat and spawning habitat for various species of freshwater fish, these include:

- Atlantic Salmon (*Salmo salar*) listed in Annex II of the EU Habitats Directive (92/43/EEC),
- Brown Trout (*Salmo trutta*),
- Sea Trout (*Salmo trutta*)
- Eel (*Anguilla anguilla*) which is protected Evaluation of Council Regulation (EC) No 1100/2007 of 18 September 2007 establishing measures for the recovery of the stock of European eel and the Conservation of Eel Fishing Bye-Law No. C.S. 319, 2015

Please Click on links for additional information in relation to the Gweebarra fish stock surveys.

http://wdfish.ie/wp-content/uploads/2020/05/Barra_2020.pdf

http://wdfish.ie/wp-content/uploads/2020/07/NWIRBD_Gweebarra_2019-1.pdf

The Following Guidance must be followed throughout the lifespan of the development:

1. If it is intended that oil or fuel be stored in or adjacent to the construction site, it must be kept in a bunded area (providing 110% capacity of the largest storage unit), 100m from any watercourse which appears on a 6" O.S. map of the site. Vehicle maintenance should not occur within 100m of any watercourse and all machinery must be in good working order, free from any leakage of fuel, oil or hydraulic fluid.
2. Roadside drains should not intercept large volumes of water from ground above. Any watercourse, however small that is intercepted by the access routes should preferably be bridged or culverted at that point. The use of fords must be avoided. Culverts should be of a size sufficient to avoid overloading, blocking or washout. The profile of any stream that is crossed must remain the same and any fish movement remain unhindered. Shooting velocities must be avoided. Floating roads must be considered where any peat encountered is one metre or more in depth. Piling may be considered for turbine bases at deep peat locations and these bases should be a minimum 50 metres from watercourses. This separation distance must be increased where fisheries sensitive waters occur.



3. Erosion of roadside embankments and cuttings should be avoided by using intercepting trenches or terracing. Embankments and cuttings should be kept at no greater slope than the normal angle of repose to encourage re-vegetation, otherwise added stabilisation may be required. It is essential that silt traps and settlement ponds are utilised and are capable of settling out materials prior to discharge off site. These ponds must take into account high precipitation events and designed accordingly, incorporating other treatment measures where necessary. The traps and ponds must be regularly inspected and maintained as required.
4. Existing drainage channels should remain untouched. During the construction period cement and wet concrete must be kept out of all watercourses and drains. Concrete trucks must not wash out on site. These materials are extremely toxic to aquatic life and the construction team must be made fully aware of this. This will be especially important during the construction of the turbine bases.
5. Track rutting's by machinery movement must be kept to a minimum and no discharge or run off containing high sediment loads must occur from the site. In this regard a contingency plan should be established and strictly adhered to. Any stockpiling of peat or other site materials will require careful management to ensure that slippage or collapse to any
6. adjacent watercourses will not occur. A construction methodology is recommended prior to any works commencing with a view to, among others, minimising the volumes of excavation that will be required. Site preparation and construction must adhere to best practice and conform to the publication 'Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites.'
7. Consideration should be afforded to the likely increase in surface water flow from the site which has the potential to alter the downstream prevailing hydrological regime and impact on the fisheries resource. In this regard attenuation measures should be identified and implemented in the surface water drainage arrangements.



8. Mitigation measures for the interception of suspended solids must be designed to comply with an upper limit of 25mg per litre for the discharge of Total Suspended Solids (TSS) to surface waters as specified in the Salmonid Waters Regulations, SI 293 of 1988. Buffer zones should not be used for the storage of any materials. Works should be suspended during heavy rains or when there is high risk of pollutants entering adjacent surface waters. Run-off volumes should not exceed the assimilative capacity of the receiving waters.
9. Consideration must be afforded to the possible presence of invasive species and appropriate action taken in eradication utilising current best practice.

It would be recommended that a suitably qualified person as described in the application documentation be on site for the duration of works to ensure:

- (a)** All mitigation measures identified are implemented prior to and during the construction phase, as appropriate. This is essential in relation to possible peat shear.
- (b)** Continual assessment to ensure the mitigation measures are effective including assessment of adjacent peats for cracking/instability.
- (c)** Cessation of works should slippage indicators develop and/or settlement arrangements are inadequate for suspended solid removal in surface waters.
- (d)** Peat reinstatement is completed according to a detailed restoration plan.
- (e)** Arrangements are established in relation to a contact protocol for the relevant statutory bodies on progress of works.

Yours sincerely

James Doherty
Environmental Officer, Inland Fisheries Ireland
North-western RBD, Letterkenny District.



Tobin Consulting Engineers,
Fairgreen House,
Fairgreen Road,
Co. Galway.
H91 AXK8.

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
D01 WA07
Éire

Irish Water
PO Box 6000
Dublin 1
D01 WA07
Ireland

T: +353 01 89 25000
T: +353 01 89 25001
www.water.ie

12th August 2021

Re: EIAR Scoping Request – Proposed development of Cloghercor Wind Farm, Co Donegal

Dear Mr Staunton,

Irish Water (IW) has received notification of your request in respect of the Environmental Impact Assessment Report (EIAR) scoping for the proposed wind farm development in Co. Donegal.

Please see attached our suggested scope in relation to Water Services. On receipt of the planning referral, Irish Water will review the EIAR as part of the planning process

Queries relating to the terms and observations above should be directed to planning@water.ie

Yours sincerely,

Signed on behalf of Irish Water:

PP: Ali Robinson

Yvonne Harris
Connections and Development Services

Response to EIAR Scoping Report Requests

IW currently does not have the capacity to advise on scoping of individual projects. However, in general we would like the following aspects of Water Services to be considered in the scope of an EIAR where relevant;

- a) Where the development proposal has the potential to impact an IW Drinking Water Source the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to IWs Drinking Water Source during construction and operational phases of the development. It is a requirement of the Water Framework Directive that waters used for the abstraction of drinking water are protected so as to avoid deterioration in quality.
- b) The waste sampling strategy for the proposed development to ensure the material is inert.
- c) Mitigation proposed for any potential negative impacts on any water source(s), in proximity including the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source is assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- e) Impacts of the development on the capacity of water services (do existing water services have the capacity to cater for the new development if required). This is confirmed by IW in the form of a Confirmation of Feasibility (COF). If a development will require a connection to either a public water supply or sewage collection system the developer is advised to submit a Pre Connection Enquiry (PCE) enquiry to IW to determine the feasibility of connection to the Irish Water network. All pre-connection enquiry forms are available from <https://www.water.ie/connections/get-connected/>
- f) Any up-grading of water services infrastructure that would be required to accommodate the development.
- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an IW collection network
- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks & potential measures to minimise/stop surface waters from combined sewers
- i) Any physical impact on IW assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets
- j) If you are considering a development proposal, it is best practice to contact us in advance of designing your proposal to determine the location of public water services assets. Details, where known, can be obtained by emailing an Ordinance Survey map identifying the proposed location of your intended development

to datarequests@water.ie. Other indicators or methodologies for identifying infrastructure located within your lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.

- k) Any potential impacts on the assimilative capacity of receiving waters in relation to IW discharge outfalls including changes in dispersion /circulation characterises
- l) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (and resultant potential impact on the capacity of the source) or the potential of the development to influence/ present a risk to the quality of the water abstracted by IW for public supply.
- m) Where a development proposes to connect to an IW network and that network either abstracts water from or discharges waste water to a “protected”/sensitive area, consideration as to whether the integrity of the site/conservation objectives of the site would be compromised.
- n) Mitigation measures in relation to any of the above ensuring zero risk to any IW drinking water sources (Surface and Ground water).

This is not an exhaustive list.

Please note

- The Confirmation of Feasibility from IW, to the applicant, should be issued prior to applying for planning permission.
- Irish Water will not accept new surface water discharges to combined sewer networks

From: John Staunton
Sent: Friday 25 June 2021 09:20
To: Denis Kelly; info@nwra.ie
Subject: RE: Proposed windfarm at Cloghercor, County Donegal
Attachments: 10798 - Cloghercor EIAR Scoping Report_21.06.21 F2.pdf

Hi Denis,

Many thanks for your email. Please see attached digital version of the Scoping Document which I hope is of help to you. If you have any further comments please let me know.

Kind regards,

John

Dr. John Staunton B.Sc. PhD.
Senior Project Manager & Environmental Scientist

TOBIN Consulting Engineers
Website: <http://www.tobin.ie>



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2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year

2018 Engineers Ireland Excellence Awards Winner: Heritage and Conservation

2017 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Innovation)

2017 KPMG Property Industry Excellence Awards Winner: Community Benefit Project of the Year

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From: Reception Galway <Reception.Galway@tobin.ie>
Sent: Thursday 24 June 2021 14:04
To: John Staunton
Subject: FW: Proposed windfarm at Cloghercor, County Donegal

From: Denis Kelly _____
Sent: Thursday 24 June 2021 13:29
To: Info <Info@tobin.ie>
Subject: Proposed windfarm at Cloghercor, County Donegal

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FAO: John Staunton

John, a chara

Many thanks for your correspondence, including booklet, received by post in respect of the proposed development of a windfarm at Cloghercor, near Doochary Village, County Donegal.

I can advise that the Regional Spatial and Economic Strategy for the Northern and Western Region should be given due consideration and it is available on the Northern and Western Regional Assembly's website at www.nwra.ie/rses

I would be grateful if you would forward a pdf version of the booklet by email to info@nwra.ie and this will enable an assessment to be expedited in respect of whether any more detailed comments should be furnished at this stage of the process.

I look forward to your response to above request in due course.

Is mise le meas
Denis

Denis Kelly
Assistant Director/Senior Planner
Northern and Western Regional Assembly
The Square,
Ballaghaderreen,
Co Roscommon,
F45 W674
Ireland,



From: Dermot O'Riordan <Dermot.ORiordan@met.ie>
Sent: Wednesday 23 June 2021 16:08
To: John Staunton
Subject: RE: Your letter to Met Éireann

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Hi John,

Thank you for sending those on, I have forwarded them to our Climate Enquiries team. I can't guarantee that anyone will be able to provide comments, but they know the option is available.

All the best with your project! 😊

Dermot

From: John Staunton
Sent: Wednesday 23 June 2021 15:29
To: Dermot O'Riordan
Subject: RE: Your letter to Met Éireann

Hi Dermot,

Thank you very much. I have attached the digital cover letter and scoping document for your information. I can indeed send this to the address you provided - we are simply offering the option of commenting on our document rather than requesting anything in particular.

Many thanks,

John

Dr. John Staunton B.Sc. PhD.
Senior Project Manager & Environmental Scientist

TOBIN Consulting Engineers
Website: <http://www.tobin.ie>

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2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year
2018 Engineers Ireland Excellence Awards Winner: Heritage and Conservation

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From: Dermot O'Riordan _____
Sent: Wednesday 23 June 2021 15:18
To: John Staunton _____
Subject: RE: Your letter to Met Éireann

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Hi John,

I work in the Facilities Division of Met Éireann, we are responsible for distributing anything that arrives by post. I received your letter today requesting information for the proposed development of Cloghercor Wind Farm, Co. Donegal.

Normally these requests are handled by our Climate Enquiries department, however due to the nature and size of your proposed development they might require additional information from our Research Division.

Unfortunately both of these teams are working from home at the moment, so I am unable to deliver your report and request to them (I would normally scan and email letters to them, however as this Scoping Report is so large and bound it's not possible in this instance).

I would recommend emailing them directly with your request, and with a digital copy of your Scoping Report. The email address is:

- enquiries@met.ie

Please note that provision of these services is [subject to fees](#), which the Climate Enquiries department can advise you of when they know how much work will need to be undertaken.

If you have any questions in relation to this, please do not hesitate to contact me.

All the best,

Dermot O'Riordan
--
TCO, Facilities
Met Éireann HQ

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Ta an teachtaireacht ríomhphoist seo scuabtha le bogearraí frithvireas.

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Ta an teachtaireacht ríomhphoist seo scuabtha le bogearraí frithvireas.

From: INFO <Information@tii.ie>
Sent: Thursday 24 June 2021 10:41
To: John Staunton
Subject: Proposed development of Cloghercor wind farm Donegal. TII Ref: TII21-113757. Your Ref: 10798.

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Dear Mr. Staunton,

Thank you for your letter of 2 June 2021 regarding the EIAR scoping exercise for the proposed development of Cloghercor wind farm, Co. Donegal. The position in relation to your enquiry is as follows.

Transport Infrastructure Ireland (TII) will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines, as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

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

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national road network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. This requirement is further reflected in the recent publication of the Draft National Investment Framework for Transport in Ireland and also the existing statutory Section 28 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

With respect to EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network.

The developer/scheme promoter should have regard, inter alia, to the following:

- It appears that the proposed windfarm site accesses the local and regional road network prior to access to the national road network. Access to the road network shall be developed in accordance with official policy and road safety considerations, as outlined above. Consultations should be had with the relevant Local Authority/National Roads Design Office, with regard to the locations of existing and future national road schemes.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development.
- The developer should assess visual impacts from existing national roads.

- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts.
- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).
- The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the 'Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes' (National Roads Authority (NRA), 2006).
- The EIAR/EIS should consider the 'Environmental Noise Regulations 2006' (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see 'Guidelines for the Treatment of Noise and Vibration in National Road Schemes' (1st Rev., NRA, 2004)).
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads. In relation to national roads, TII's 'Traffic and Transport Assessment Guidelines' (2014) should be referred to in relation to proposed development, with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of TII's TTA Guidelines, which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed, as TII will not be responsible for such costs.
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

The national road network is managed by a combination of Public Private Partnership (PPP) Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII.

The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses, to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is safeguarded.

Additionally, any damage caused to the pavement on the existing national road arising from any temporary works due to the turning movement of abnormal 'length' loads (e.g. tearing of the surface course, etc.) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

Designers should consult TII Publications to determine whether a Road Safety Audit is required for any of the temporary works proposed. Any recommendations should be incorporated into designs.

- Grid connection and cable routing proposals should be developed to safeguard proposed road schemes as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

In the context of the existing national road network, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the network. This requirement is further reflected in the National Development Plan, the recent publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

There are around 99,000km of roads in Ireland, the national road network which caters for strategic inter-urban travel consists of only approx. 5.4% of this. There is a critical requirement to ensure the strategic capacity and safety of this national road network is maintained and significant Government investment already made in the national road network is safeguarded.

The provision of cabling along the national road network represents a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy. Therefore, TII advises that grid connection cable routing should seek to utilise the extensive existing local road network, or alternatives, as opposed to the strategic national road network, contrary to the provisions of official policy.

Other consents or licences may be required from the road authority for any trenching or cabling proposals crossing the national road. TII requests referral of all proposals agreed and licensed between the road authority and the applicant, which affect the national road network.

Cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.

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

I hope that this information is of assistance to you.

Yours sincerely,

Alban Mills
Senior Regulatory and Administration Executive



Transport Infrastructure Ireland

Parkgate Business Centre
Parkgate Street
Dublin D08 DK10

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John Staunton

From: Transport GCU
Sent: Tuesday 15 November 2022 14:12
To: John Staunton
Subject: RE: Contact details for Department of Transport

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Good afternoon John,

Thank you for contacting Department of Transport in relation to this scoping exercise.

The department have no comments to make at this point in time.

It would be appreciated if you could keep the department of any future developments.

Kind regards
Jacqui

Jacqui Traynor
Central Policy, Coordination and Reform
An Roinn Iompair
Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60

gcu@transport.gov.ie www.gov.ie/transport

From: John Staunton
Sent: Wednesday 26 October 2022 23:03
To: Transport GCU
Subject: RE: Contact details for Department of Transport

Dear Sir/Madam,

As a follow up to the below scoping exercise, please see attached an updated site layout. Please let me know if you have any queries or comments on this.

Kind regards,

John

Dr. John Staunton B.Sc. PhD.
Senior Project Manager & Environmental Scientist



2022 Association of Consulting Engineers of Ireland Awards Winner: Innovation
2020 Association of Consulting Engineers of Ireland Awards Winner: Project Management
2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)
2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year
2018 Engineers Ireland Excellence Awards Winner: Heritage and Conservation

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From: GCU - Reform Communications and Emergency Planning Divisional Mailbox
Sent: Thursday 7 October 2021 15:52
To: John Staunton
Subject: Contact details for Department of Transport

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Good afternoon,

Thank you for your recent correspondence in relation to the Proposed Development of Cloghercor Wind Farm, Co. Donegal.

Unfortunately, we have been working remotely for the past number of months with limited access to the office and were unable to respond to your request.

It would be appreciated if you could forward any future correspondence via email to gcu@transport.gov.ie

Kind regards
Jacqui

Jacqui Traynor
Reform Communications Emergency Planning

An Roinn Iompair
Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

Tá ár Ráiteas Príobháideachta le fáil ar www.transport.gov.ie

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Dr. John Staunton
Senior Project Manager and Environmental Scientist
Tobin Consulting Engineers
Fairgreen House
Fairgreen Road
Galway

15 November 2022

Re: Proposed Development of Cloghercor Windfarm, Co. Donegal.

Dear Dr. Staunton,

I write in response to your e-mail dated 26th October 2022 re. Proposed Development of Cloghercor Windfarm, Co. Donegal

I wish to advise at the outset that any determination in relation to a planning consent is solely a matter for the planning authorities and/or ABP, as appropriate. Therefore, the following observations are made on a non-prejudicial basis, and are not intended to be used to rely on for a prospective planning application, nor are these observations to be relied on in the event of any commercial transaction pertaining to such lands and they are not to be relied on in the event of any contract exchange pertaining to same.

Based on the information supplied and having consulted with the subject matter experts in the Irish Air Corps, the Department of Defence wishes to make the following observation:

Single turbines, structures, or turbines delineating the windfarm should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. Obstacle lighting should be incandescent or of a type visible to Night Vision equipment. Obstacle lighting must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light.



Nothing in the above observations shall be taken as a binding response by the Minister for Defence in the event that a planning application is made. The Minister reserves the right to comment on the actual planning application as and when it is submitted in accordance with the provisions of the planning regulatory code.

Furthermore, we would appreciate if you could keep us informed on all developments relating to this proposed development, especially if it progresses to the planning stage.

Please get in contact if you have any queries in this regard.

Yours faithfully,

Sent via e-mail

Don Watchorn
Property Management Branch
Department of Defence
Station Road
Newbridge
Co. Kildare W12 AD93

John Staunton

From: Breandán Ó Baoill
Sent: Friday 18 November 2022 09:11
To: John Staunton
Cc: Eilis Docherty
Subject: RE: Eilís Dochererty - 10798 - Cloghercor Wind Farm

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Hi John,

Thanks for the copy of the Special Aeronautical Study on the Cloghercor Wind Farm. As the report indicates that the proposed Cloghercor Wind Farm does not pose a risk to flight operations at Donegal airport, we have no further comments to add.

Many thanks for your cooperation.

Kind regards,

Breandán

| **Breandán Ó Baoill** | **SATCO/ATM Safety Manager** | **Air Traffic Control** | **Donegal Airport** |
| Carrickfinn, Kincasslagh, Co Donegal, F94 X2RH, Ireland |
Website: www.donegalairport.ie

From: John Staunton
Sent: Thursday 17 November 2022 14:27
To: Breandán Ó Baoill
Cc: Eilis Docherty
Subject: RE: Eilís Dochererty - 10798 - Cloghercor Wind Farm

Hi Breandán,

Please see attached the report from ASAP. Please let me know if you have any comments.

Kind regards,

John

Dr. John Staunton B.Sc. PhD.
Senior Project Manager & Environmental Scientist

TOBIN Consulting Engineers
Galway | Dublin | Castlebar | Limerick | Sligo
Website: <http://www.tobin.ie>



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From: Breandán Ó Baoill
Sent: Tuesday 4 October 2022 09:41
To: John Staunton
Cc: Eilís Docherty
Subject: RE: Eilís Dochererty - 10798 - Cloghercor Wind Farm

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Hi John,

Thanks for the information below. The RNP and Conventional IFP's are still in draft format but I do not envisage any major changes to them.

I will await the feedback from ASAP once they have completed the assessment.

Kind regards,

Breandán

| **Breandán Ó Baoill** | SATCO/ATM Safety Manager | Air Traffic Control | Donegal Airport |
| Carrickfinn, Kincasslagh, Co Donegal, F94 X2RH, Ireland |
Website: www.donegalairport.ie

From: John Staunton
Sent: Tuesday 4 October 2022 09:31
To: Breandán Ó Baoill
Subject: RE: Eilís Dochererty - 10798 - Cloghercor Wind Farm

Hi Breandán,

I hope all is well. Please find below the latest 19 turbine layout for Cloghercor Wind Farm. We have instructed ASAP to carry out an assessment of these with regard to your airport. Can you confirm if the RNP and Conventional IFP's which you sent to me last year (your email attached for convenience) are still valid and correct?

Turbine ID	Latitude (WGS84):	Longitude (WGS84):	X CoOrd (ITM):	Y CoOrd (ITM):
Position 1	54.8849654	-8.2142554	586252.2	90415.2
Position 2	54.8811251	-8.2087809	586602.2	90372.2
Position 3	54.8788387	-8.2224301	585725.5	90347.5
Position 4	54.875095	-8.2169649	586074.94	90305.94
Position 5	54.871622	-8.2124054	586366.4	90266.4
Position 6	54.874875	-8.2318875	585117.11	90303.11
Position 7	54.8709294	-8.2259246	585498.4	90259.4
Position 8	54.8687754	-8.2375006	584754.55	90235.55
Position 9	54.8668757	-8.2193261	585920.53	90213.53
Position 10	54.8633711	-8.21258	586352.41	90174.41
Position 11	54.8605015	-8.2261115	585482.66	90143.66
Position 12	54.8639913	-8.2313972	585144.58	90182.58
Position 13	54.8591752	-8.2374553	584753.84	90128.84
Position 14	54.8627167	-8.2438006	584347.8	90168.8
Position 15	54.8545332	-8.2334342	585010.3	90076.3
Position 16	54.8554719	-8.2480304	584073.39	90087.39
Position 17	54.8593841	-8.2529358	583759.98	90131.98
Position 18	54.8507548	-8.2436444	584353.2	90035.2
Position 19	54.8476141	-8.2373155	584758.46	89999.46

Kind regards,

John

Dr. John Staunton B.Sc. PhD.
Senior Project Manager & Environmental Scientist

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2018 Engineers Ireland Excellence Awards Winner: Heritage and Conservation

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From: Breándan Ó Baoill
Sent: Friday 5 November 2021 17:09
To: John Staunton
Subject: FW: Eilís Dochererty - 10798 - Cloghercor Wind Farm

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Dear John,

Find attached a draft copy of our proposed RNP and Conventional IFP's which we propose to implement in Q1 of 2022. The IFP's were designed by ASAP s.r.o. who are an approved Instrument Flight Procedure Design Company. The assessment needs to be completed by an IAA approved Instrument Flight Procedure designer.

If you require any further information do not hesitate to contact me.

Kind regards,

Breandán

| Breandán Ó Baoill | SATCO/ATM Safety Manager | Air Traffic Control | Donegal Airport |
| Carrickfinn, Kincasslagh, Co Donegal, F94 X2RH, Ireland |
Website: www.donegalairport.ie

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From: Eilís Docherty
Sent: Friday 5 November 2021 16:43
To: 'bobaoill'
Subject: FW: Eilís Dochererty - 10798 - Cloghercor Wind Farm

Hi Breandán
See below – can you provide the information he is looking for please?
Thanks
Eilís

| **Eilís Docherty** | **Managing Director** | **Donegal Airport** |
| Carrickfinn, Kincasslagh, Co Donegal, F94 X2RH, Ireland |
Website: www.donegalairport.ie

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From: John Staunton
Sent: Friday 5 November 2021 16:20
To: info@donegalairport.ie
Subject: FAO: Eilís Dochererty - 10798 - Cloghercor Wind Farm

Dear Eilís,

Many thanks for your letter of the 30th June regarding the proposed Cloghercor Wind Farm, near Glenties, Co. Donegal (attached for your convenience).

You mentioned in this that you wanted us to carry out an assessment to look at the potential impacts on the current and future IFPs for the airport. While our specialist (IAA approved) subconsultants can, I understand, access required information on the current IFPs, they have asked for clarity on your reference to future IFPs.

Can you confirm if you have submitted (or are currently developing) new IFPs that are not yet approved? If so, could you forward us some information about these so that we may include them in the assessment?

Kind regards and thank you for your time,

John

Dr. John Staunton B.Sc. PhD.
Senior Project Manager & Environmental Scientist

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Website: <http://www.tobin.ie>



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2018 Engineers Ireland Excellence Awards Winner: Heritage and Conservation
2017 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Innovation)
2017 KPMG Property Industry Excellence Awards Winner: Community Benefit Project of the Year

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John Staunton

From: DONNA CALLAGHAN
Sent: Wednesday 16 November 2022 16:09
To: John Staunton
Subject: RE: Proposed Cloghercor Wind Farm - Scoping

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Hi John,

Further to the submission of a pre planning enquiry with regard to a proposed wind farm at Cloghercor, Glenties, and to your request for a pre planning meeting, please be advised as follows;

A successful high court action (in 2018) challenging the nature of the wind energy policies and objectives adopted as part of the County Development Plan 2018-2024 (as varied) has resulted in the removal of significant parts of the wind energy strategy from the Plan. Following the publication of the Draft Wind Energy Guidelines on 12th December 2019, Donegal County Council commenced the variation process in respect of a Wind Energy Policy Framework to the CDDP and a Variation was 'made' (i.e. adopted and therefore incorporated into the CDDP) at the plenary meeting on 18/07/2022, in accordance with Section 13 (6) (a) of the Planning and Development Act, 2000 (as amended). This document set out the policy direction of the Planning Authority with regard to wind energy and includes as Map 8.2.1, wind energy mapping for the county.

Pursuant to the decision to adopt the variation (which included not accepting recommendations made by the Office of the Planning Regulator (OPR)), the Planning Authority notified the OPR as is required under Sections 13(5)(aa) and 31AM(6)(a) of the Planning and Development Act, 2000 (As Amended). On Monday 29th August, 2022, the Minister for Local Government and Planning issued a '**Notice of Intention to Issue a Direction**' to the Council under Section 31 of the Planning and Development Act, 2000.

A period of public consultation on the Minister's Notice of Intention to Issue a Direction has taken place between the 9th September and the 22nd September 2022 inclusive.

In line with statutory requirements, a Chief Executive's report was prepared on the public consultation period under section 31(8), and furnished to the Office, 4 weeks after the public consultation process was completed, for further consideration. As such, the Final Direction has yet to be issued on foot of the same.

In light of the above, you are advised that it may be prudent to withhold consultation until such times as policy is agreed and in place.

The Planning Authority also at this early stage advises you of serious concerns as to the impact on scenic and natural amenities that would arise from the development and would refer you to a recent decision to refuse a similar development (planning application ref. no. 2251393) for inter alia, the following reasons –

1. Pursuant to the decision to adopt the Variation in respect of a Wind Energy Policy Framework to the County Development Plan 2018-2024 (as varied) on 18/07/2022, in accordance with Section 13 (6) (a) of the Planning and Development Act, 2000 (as amended), the Minister for Local Government and Planning issued a '**Notice of Intention to Issue a Direction**' to the Council under Section 31 of the Planning and Development Act, 2000 which

has resulted in the removal of significant parts of the wind energy policies from the Plan. Although the Council has committed to resolving this situation through public consultation in response to the Minister's Notice and in line with statutory requirements, a Chief Executive's report is to be prepared on the public consultation period under section 31(8), in the interim, it has meant that there are deficiencies within the Wind Energy Policy Framework to enable the Planning Authority to carry out proper decision making on wind energy development proposals. Therefore, having regard to the extent of the lacuna in Wind Energy policy, the Planning Authority considers that it is not in a position to adequately assess wind energy proposals given the dearth in current Development Plan policy and National Guidelines on the matter. Therefore in the context of the current wind energy policy lacuna, the impending publication of new Wind Energy Guidelines by the Department of Housing, Planning & Local Government, and the outcome of the Ministerial Direction the Planning Authority considers that it would be premature and contrary to proper planning and sustainable development to permit the current wind farm development proposal.

2. The subject site is located on open and exposed undulating lands which are designated as an Area of High Scenic Amenity in the County Development Plan, 2018-2024 (as varied). Policy NH-P-7 of the County Donegal Development Plan 2018-2024 (as varied) states that 'within areas of High Scenic Amenity and Moderate Scenic Amenity, as identified on Map 7.1.1, and subject to the other objectives and policies of this Plan, it is the Policy of the Council to facilitate development of a nature, location and scale that allows the development to integrate within and reflect the character and amenity designation of the landscape'. Furthermore Policy NH-P-13 seeks to preserve views and prospects of special amenity value and interest in particular views between public roads and the sea, lakes and rivers set out on Map 7.1.1 Scenic Amenity of the County Development Plan 2018-2024 (as varied)

Having regard to:

- The height and scale of the proposed wind turbines,
- The highly prominent skyline nature of the wind turbines and
- The high level of visibility of the proposed turbines over an expansive area and the coastal areas in the vicinity,

It is considered that the proposed development sited at this location would constitute a highly obtrusive development that would detract from the existing natural character of the area, would erode the landscape and visual quality of the coastal and designated Wild Atlantic Way scenic route in the vicinity and would adversely impact on the rural character of the area as well as visually impacting adversely on protected views and prospects from the Gweebarra Bridge. The proposed wind turbines would, thereby, be excessively dominant features and a visually obtrusive form of development in this landscape, which would contribute to the erosion of the visual and environmental amenity of the area, and materially conflict with the objectives and policies as set out in the County Donegal Development Plan, and would seriously injure the landscape and visual amenities of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

3. It is a policy of the Council (Policy E-P-12, County Donegal Development Plan 2018-2024 (as varied)) that appropriate new wind energy developments can be considered "within the areas identified as 'open to consideration' on the Wind Energy Map 8.2.1. Having regard to the fact that a majority of the lands where the proposed development is located is outside of an area 'open to consideration'. It is considered that to permit the proposed development would materially contravene the aforementioned policy provisions of the County Donegal Development Plan 2018-2024 (as varied) and would thereby be contrary to the proper planning and sustainable development of the area.

What is noteworthy is that prior to the Minister for Local Government and Planning issuing a 'Notice of Intention to Issue a Direction' to the Council in terms of the variation in respect of a Wind Energy Policy Framework to the CDDP, as referred to above, the Development is located within an area 'Not Normally Permissible' in the current variation of the DCDP 2018-2024.



Furthermore, the above screenshot is taken from the Donegal County Development Plan 2018-2024 (as varied), Volume 1, Map 7.1.1, Scenic Amenity. The blue directional arrows indicate protected views that are included within Policies NH-P-13 & NH-P-17

NH-P-13: It is a policy of the Council to protect, conserve and manage landscapes having regard to the nature of the proposed development and the degree to which it can be accommodated into the receiving landscape. In this regard the proposal must be considered in the context of the landscape classifications, and views and prospects contained within this Plan and as illustrated on Map 7.1.1: 'Scenic Amenity'.

NH-P-17: It is a policy of the Council to seek to preserve the views and prospects of special amenity value and interest, in particular, views between public roads and the sea, lakes and rivers. In this regard, development proposals situated on lands between the road and the sea, lakes or rivers shall be considered on the basis of the following criteria: Importance value of the view in question; Whether the integrity of the view has been affected to date by existing development; Whether the development would intrude significantly on the view; Whether the development would materially alter the view.

In addition, the proposed wind farm development is located partially on lands designated in the County Development Plan 2018-2024 (as varied) as 'Especially High Scenic Amenity' (EHSA). Policy NH-P-6 of the County Development Plan 2018-2024 (as varied) states that 'it is a policy of the Council to protect areas identified as Especially High Scenic Amenity on Map 7.1.1: 'Scenic Amenity'. Within these areas, only developments assessed to be of strategic importance or developments that are provided for by policy elsewhere in this Plan shall be considered'. EHSA landscapes are defined as 'sublime natural landscapes of the highest quality that are synonymous with the identity of County Donegal. These areas have extremely limited capacity to assimilate additional development'.

These viewpoints are located on the Wild Atlantic Way whereby Policy TOU-P-5 is relevant - TOU-P-5 It is a policy of the Council not to permit development which would materially detract from visual and scenic amenities along the route of the Wild Atlantic Way.

In summary, the Planning Authority can appreciate the move to a low carbon future and acknowledge the need to encourage the use of renewable resources to reduce greenhouse gas emissions and to meet renewable energy targets set at a European Level however in relation to the proposed location the Planning Authority is very aware of the visual sensitivities of such an installation and the proximity of the site to the adjoining West of Ar dara/Maas SAC (Ecological considerations). In the interim and having regard to the extent of the lacuna in relation to this matter, proposals brought forward for consideration are considered premature pending the outcome of the Final Ministerial Direction.

Please be aware that this advice is given based on the information submitted to date and is without prejudice to any decision which the Planning Authority should make upon the formal receipt of a planning application, or without prejudice to any report the Council may receive on foot of such application.

Is Mise le meas,

Kind regards

Donna Callaghan
A/Executive Planner
Glenties Municipal District
Development Management Unit

Directorate of Community Development & Planning Service
Donegal County Council



Comhairle Contae
Dhún na nGall
Donegal County Council

From: John Staunton
Sent: Wednesday 9 November 2022 17:18
To: DONNA CALLAGHAN
Cc: Siobhan Tinnelly
Subject: Proposed Cloghercor Wind Farm - Scoping

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Hi Donna,

Thank you for the call this afternoon. Please find attached as requested the scoping document that was sent out for the project in 2021 (to Donegal [Co.Co.](#) planning office). Note, some of the content on this may be old at this stage, so you will find the latest project information at the following website (click on "Enter Exhibition Room" on this page):

<https://cloghercorwindfarm.com/view-our-proposal/>

For example, we were originally looking at 23 no. turbines, but now we have reduced this to 19. I am happy to talk through it if you need to call me on Friday. Otherwise, I would appreciate any comments you might have on the project.

A public consultation event was held in Lettermacaward and Doochary last week (with the above linked information).

As mentioned, we would also like to obtain a letter of consent to make a planning application for works within the public road corridor. If you can let me know who to contact (if not yourself), that would be appreciated.

If you have any queries, please let m know.

Kind regards,

John

Dr. John Staunton B.Sc. PhD.
Senior Project Manager & Environmental Scientist

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