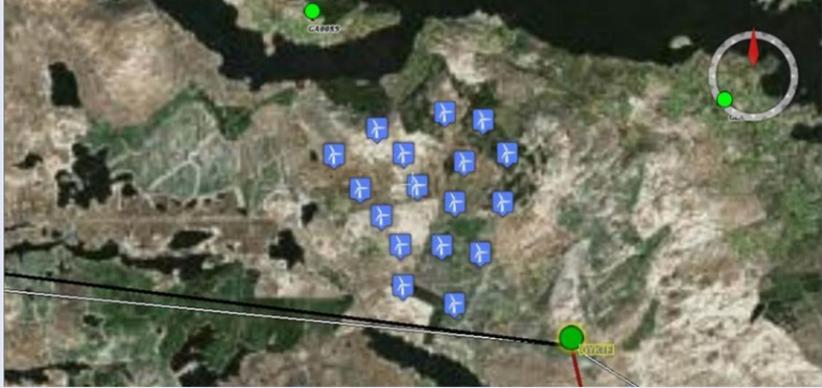


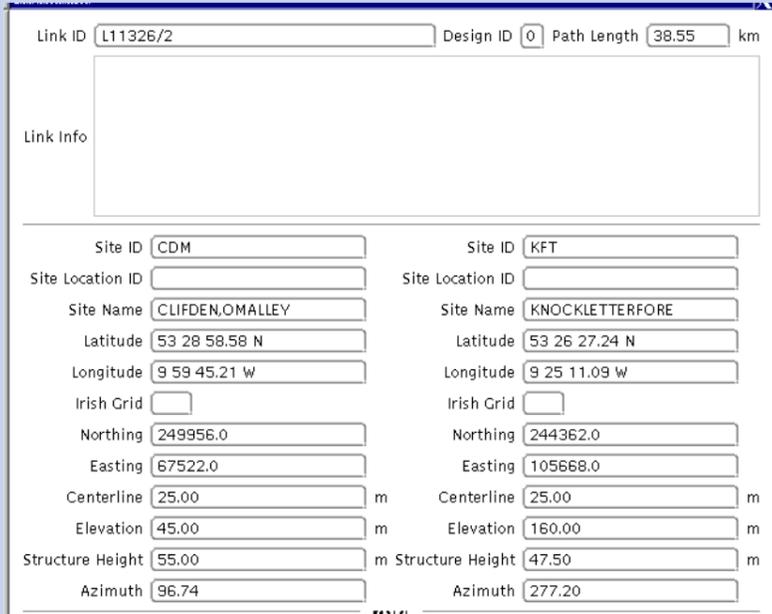
Appendix 1.3: Scoping Opinion

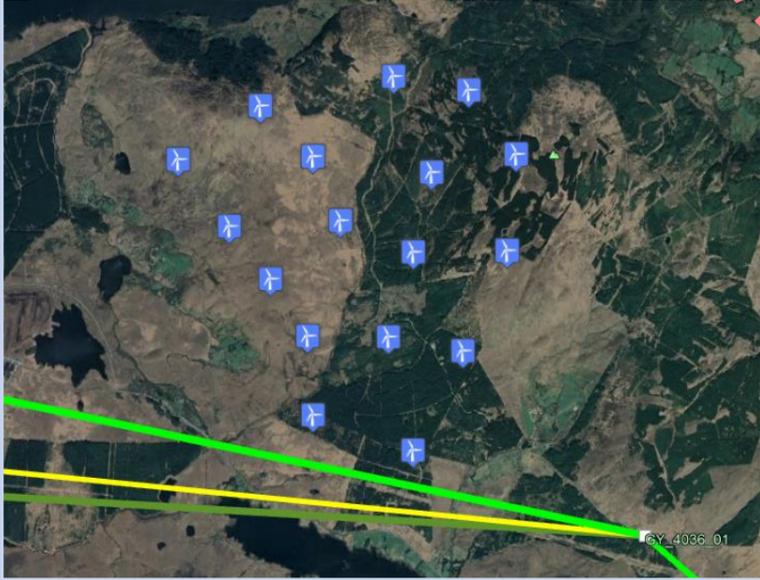
Consultee Organisation	Contact Name	Email/ Phone No	Response Received	Implications for the EIA/Design	EIAR Chapter / Section where Comments have been addressed
Galway County Council (Roads Section)	Patricia Delaney Infrastructure & Operations	roads@galwaycoco.ie Patricia Delaney Tel (091) 509370 Fiona Holland Tel (091) 509522	Email receipt received from Patricia. SG followed up with a phone call on 14.12.2021, was given Fiona Holland as a direct contact. SG left message for Fiona but no feedback was received. Meeting held with Planners and Environment Section on 27 th October 2021. A meeting was held with Jack Houlihan of Galway County Council Roads Dept on 8 th December 2021.	The main points from the meeting on 27 th October 2021 were as follows: <ul style="list-style-type: none"> • Could also meet with Conor Quigley Roads Engineer at GCC. • GCC concerned about shallow culverts on the haul route. • Pavement Condition surveys required on sections of road constructed on peat, N59 Maam Cross to the site (not relevant) and Maam Cross to Screebe. • Swept Path Analysis required for all pinch points. • Important to include grid in planning application. The main points from the meeting on 8 th December 2021 were as follows: Route using N59 through Oughterard technically feasible but requires a lot of studies and community liaison. <ul style="list-style-type: none"> • Could look at coming back in for planning at a later date • Use of blade lifter would require 2 x 150m x 40m changeover areas. There are a lot of bridges on the proposed haul route. 2 of these are protected structures, 1 in Spiddal and another in Maam. No bridges have been surveyed by Galway County Council to date. Bridge survey to be carried out for planning including structural assessments for mason arch bridges. <ul style="list-style-type: none"> • Some of the newer bridges may have construction drawings but most are older. • Jack Houlihan to send on map of bridges on the route. There is a bridge app with an RMO process which could be used. <ul style="list-style-type: none"> • JOD to see about gaining access to the app. • Conor Quigley of Galway County Council may have more info. No pavement surveys have been undertaken to date. <ul style="list-style-type: none"> • Screebe to Maam Cross may be an issue. Galway County Council would look for surveys on that route including falling weight deflectometers. Grid Aim to have cable in the road itself. An OHL would avoid a lot of disruption. A separate meeting with Conor Quigley in the area office would be advisable.	Chapters: 2, 13
Galway County Council (Water Services)	Kelly-Anne Quinn Customer Services	customerservices@galwaycoco.ie	Email receipt received and forwarded to Planning Section. No response received to date.		
Galway County Council (Environment Section)	Trevor Coleman, Environment Section	environment@galwaycoco.ie Tel (091) 509510	Received an acknowledgement of SG phone call on 14.12.2021 by email from Environment Section on 15.12.2021. Trevor Coleman forwarded the email to the Planning Section. No feedback received. Meeting held with Planners and Environment Section on 27 th October 2021.	Site Designations from CDP and Draft CDP 2022-2028 <ul style="list-style-type: none"> • EIA Screening and Appropriate Assessment (AA) Screening required. GCC will do a Strategic Assessment looking at the designations of the site. • A crucial component for GCC in assessing wind farm applications is the designation of the area in the Local Authority Renewable Energy Strategy (LARES) and draft LARES. <ul style="list-style-type: none"> ○ Site is in a 'Not Normally Permissible' designated area. ○ 6,500ha of land is designated as 'Normally Permissible' in County Galway. <u>Note: when all constraints considered this reduces to about 10%.</u> ○ Draft LARES on Galway CC website. ○ Designation in LARES does not favour this project. • Landscape Character Assessment is important. <ul style="list-style-type: none"> ○ Class 4 landscape – "outstanding" value, problematic for GCC. ○ Protected view in front of site. • EIA and NIS will be required. 	Chapters: 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13

Consultee Organisation	Contact Name	Email/ Phone No	Response Received	Implications for the EIA/Design	EIAR Chapter / Section where Comments have been addressed
				<p>Grid Route</p> <ul style="list-style-type: none"> Route will need to be 'rated' in EIAR so will need to be included in red line boundary. The project will be less 'challengeable' by JR if grid is included considering O'Grianna ruling. <p>Guidelines</p> <ul style="list-style-type: none"> Project will need to adhere to draft Wind Energy Guidelines <ul style="list-style-type: none"> 740m setback from houses Noise levels Zero shadow flicker <p>Community Fund</p> <ul style="list-style-type: none"> Community fund (Municipal District Led) should be setup. Roscahill paid €6,500/MW plus €1,300/MW per year. EMPower will have a community fund for the area separate from the above GCC requirement. <p>Haul Route</p> <ul style="list-style-type: none"> R366 is a problematic road for GCC. EMP pointed out that the alternative Oughterard route is difficult due to the bridge so R366 preferred. <p>Soils and Geology</p> <ul style="list-style-type: none"> RSRA should be carried out for the project. <p>Miscellaneous</p> <ul style="list-style-type: none"> GCC view wind farms as temporary structures Decommissioning plan to accompany application. 10 year construction and 35 year permission. GCC have a tendency to stipulate a 30 year permission. <p>Ecology</p> <ul style="list-style-type: none"> Avian flight paths and habitat surveys required. <p>Landscape and Visual</p> <ul style="list-style-type: none"> Based on current CDP, serious issues re designations and landscape. Consider draft LARES. 	
Mayo County Council	Fiona Foy Planning Office	info@mayococo.ie planning@mayococo.ie	Following SG phone call on 14.12.2021, SG received an acknowledgement email on 14.12.2021 saying it was receiving attention by the Planning Section. No feedback received.		N/A
Agriculture					
Department of Agriculture	Aaron Scully	minister@agriculture.gov.ie / 01 607 2000	Following SG phone call on 14.12.2021 an Email was received from Aaron Scully (Ministers Office), dated 15.12.2021 confirming receipt of JOD letter, which was forwarded to relevant Dept. officials and brought to the Ministers Attention.		Chapter: 12
Telecommunications					
Vodafone	Sean Lyons, Chris Stephenson	chris.stephenson2@vodafone.com sean.lyons@vodafone.com	Email sent on 29.07.20 requesting info on links in the area. Responses of 30.07.20 and 31.07.20 providing link info.	<p>Indication of any LOS microwave links that are affected by the proposed location of this proposed wind farm development. NONE</p> <p>Site co-ordinates of the telecoms tower locations of microwave links that may be impacted by the proposed development. N/A</p>	Chapter: 12

Consultee Organisation	Contact Name	Email/ Phone No	Response Received	Implications for the EIA/Design	EIAR Chapter / Section where Comments have been addressed
				<p>Antenna mast heights for both ends of each link. N/A</p> <p>Network \ Overlay maps showing impacted telecoms infrastructure traversing the proposed wind farm development. N/A</p>  <p>Please find coordinates as requested below. GYKTFGYCDM_S0 GYKTF - 105697.49, 244349.25 (TM75/Irish Grid) GYCDM - 67554.38, 249942.75 (TM75/Irish Grid) Antenna Height 30m on both sites. GYKTFGY168_S0 GYKTF - 105697.49, 244349.25 (TM75/Irish Grid) GY168 - 81875.3, 247139.47 (TM75/Irish Grid) Antenna Height 15m on both sites.</p>  <p>Link info provided on 30th and 31st July 2020 was mapped and added to the overall Constraints Map so that siting of turbines would not affect links in the area.</p>	
Broadcasting Authority of Ireland	Roger Woods	rwoods@bai.ie / 01 644 1200	Received email response on 16th December. Email from Roger Woods (rwoods@bai.ie), Senior Executive Engineer on 16.12.2021. <i>The BAI does not perform an in-depth analysis of the effect of wind turbines on FM networks. However, we are not aware of any issues from existing windfarms into existing FM networks.</i>	None	Chapter: 12

RECEIVED: 26/01/2023

Consultee Organisation	Contact Name	Email/ Phone No	Response Received	Implications for the EIA/Design	EIAR Chapter / Section where Comments have been addressed																																																																														
			<i>Also, the proposed windfarms are not located close to any existing or planned FM transmission sites.</i>																																																																																
Commission for Communications Regulation	Tom Butler	industry@comreg.ie / 01 804 9600	SG rang on 14.12.2021. Told by reception to resend email. No feedback received.																																																																																
Department of Defence		info@defence.ie / 045 492 000	Letter of response received by email on 28.09.2021.	<p>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.</p> <p>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.</p> <p>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 an actual planning application as and when it is submitted in accordance with the provisions of the planning regulatory code.</p>	N/A																																																																														
Shannon Airport		nandi.osullivan@shannongroup.ie	No response received to date.		Chapter: 12																																																																														
eircom Limited	Thomas Sheridan	thomas.sheridan@eir.ie / 091 773 615 / 085 1742 191	<p>SG rang on 14.12.2021 and 15.12.2021, left voicemail. No response received to date (18.01.2021).</p> <p>Coordinates of the telecoms links in the area were requested in an email to John Bagnall on 29.07.2020. Responses of 06.08.20 and 03.09.20 contained links info.</p>	<p>Eircom Ltd have a number of microwave Radio Links on the path below. The turbine layout as shown in the kmz file shouldnt be a problem but please let me know the proposed turbine co-ordinates (in Irish Grid) when the proposed layout is finalised.</p>  <p>The screenshot shows a 'Link Info' window with the following data:</p> <table border="1"> <tr> <td>Link ID</td> <td>L11326/2</td> <td>Design ID</td> <td>0</td> <td>Path Length</td> <td>38.55 km</td> </tr> <tr> <td>Site ID</td> <td>CDM</td> <td>Site ID</td> <td>KFT</td> <td></td> <td></td> </tr> <tr> <td>Site Location ID</td> <td></td> <td>Site Location ID</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Site Name</td> <td>CLIFDEN,OMALLEY</td> <td>Site Name</td> <td>KNOCKLETTERFORE</td> <td></td> <td></td> </tr> <tr> <td>Latitude</td> <td>53 28 58.58 N</td> <td>Latitude</td> <td>53 26 27.24 N</td> <td></td> <td></td> </tr> <tr> <td>Longitude</td> <td>9 59 45.21 W</td> <td>Longitude</td> <td>9 25 11.09 W</td> <td></td> <td></td> </tr> <tr> <td>Irish Grid</td> <td></td> <td>Irish Grid</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Northing</td> <td>249956.0</td> <td>Northing</td> <td>244362.0</td> <td></td> <td></td> </tr> <tr> <td>Easting</td> <td>67522.0</td> <td>Easting</td> <td>105668.0</td> <td></td> <td></td> </tr> <tr> <td>Centerline</td> <td>25.00 m</td> <td>Centerline</td> <td>25.00 m</td> <td></td> <td></td> </tr> <tr> <td>Elevation</td> <td>45.00 m</td> <td>Elevation</td> <td>160.00 m</td> <td></td> <td></td> </tr> <tr> <td>Structure Height</td> <td>55.00 m</td> <td>Structure Height</td> <td>47.50 m</td> <td></td> <td></td> </tr> <tr> <td>Azimuth</td> <td>96.74</td> <td>Azimuth</td> <td>277.20</td> <td></td> <td></td> </tr> </table> <p>We have one transmission link near the proposed windfarm plot that is just outside the area of risk, the end points of the transmission link are below, for windfarm developments we would keep a buffer of 100meters radius away from this transmission path.</p> <p>Link 1 – End point 1 - 53°27'50.21"N 9°36'17.58"W, End point 2 – 53°26'27.08"N 9°25'9.64"W</p>	Link ID	L11326/2	Design ID	0	Path Length	38.55 km	Site ID	CDM	Site ID	KFT			Site Location ID		Site Location ID				Site Name	CLIFDEN,OMALLEY	Site Name	KNOCKLETTERFORE			Latitude	53 28 58.58 N	Latitude	53 26 27.24 N			Longitude	9 59 45.21 W	Longitude	9 25 11.09 W			Irish Grid		Irish Grid				Northing	249956.0	Northing	244362.0			Easting	67522.0	Easting	105668.0			Centerline	25.00 m	Centerline	25.00 m			Elevation	45.00 m	Elevation	160.00 m			Structure Height	55.00 m	Structure Height	47.50 m			Azimuth	96.74	Azimuth	277.20			Chapter: 12
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Consultee Organisation	Contact Name	Email/ Phone No	Response Received	Implications for the EIA Design	EIAR Chapter / Section where Comments have been addressed
				<p>Please keep sending future windfarm development analysis and large infrastructure project request to MobileNetworksTXN@eir.ie for Eir Mobile (formerly Meteor) network analysis.</p>  <p>Link info provided on 3rd September 2020 was mapped and added to the overall Constraints Map so that siting of turbines would not affect links in the area.</p>	
ESB Telecoms Ltd		info@esbtelecoms.ie	No response received to date.		Chapter: 12
RTÉ	Matthew Craig	windfarms@rte.ie matthew.craig@2rn.ie / 01 208 2261 / 087 7509 955	Email from Matthew Craig (matthew.craig@2rn.ie), Project Engineer, 'We don't have any fixed linking in the area. There is a risk of interference to our broadcasting services in the area and we would like to sign a protocol with the developer should the site go ahead.'		Chapter: 12
Virgin Media Television	Paul Driver	Paul.Driver@virginmedia.ie / 01 245 8586 / 087 6287 133	Email response received 14.10.2021. 'Whilst the Information given is believed to be correct no warranty is made as to its accuracy. This information must not be relied upon in the event of excavation or other works carried out in the site area. No liability of any kind whatsoever is accepted by Virgin Media, its servants or agents for any error or omission in respect of information contained within this communication. The actual position of underground services must be verified and established on site before any mechanical plant is used.'		Chapter: 12
Three	Alister Cole	alister.cole1@three.ie	Coordinates of the telecoms links in the area were requested in an email to Alister Cole on 29.07.2020. Responses of 04.08.20 and 26.01.21 contained links info and clarifications to inform the wind farm design.	Info provided on 04.08.20: Looking at the current proposed tower locations we currently have only 1 link that could be affected; The site coordinates for both ends of the link are – GA0045(105667/244364) and GA0113(92040/255299) – shown below;	Chapter: 12

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				 <p>The link to the south should not be affected as there is approx. 200m clearance.</p> <p>Info provided on 26.01.21: I have reviewed the turbine locations at the proposed Letterkeegaun windfarm. T12 in its current proposed location would block the LoS for one of our Microwave links. I have added the turbine locations to our planning tool and it calculates the distance from the centre of our MW link to the tower is 70m. With a rotor radius of 75m this would be an issue.</p> <p>We would require the distance of 75m for rotor plus the clearance for the Microwave Fresnel zone (10m) so a total of 85m.</p>	
<p>Air Navigation</p>				<p>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.</p> <p>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.</p> <p>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</p>	<p>Chapter: 12</p>

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				<p>following data is to be supplied once construction is planned or commenced or available to the airspace team via airspace@iaa.ie:</p> <ul style="list-style-type: none"> 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? <table border="1"> <thead> <tr> <th>ICAO Light Type</th> <th>Colour</th> </tr> </thead> <tbody> <tr> <td>Low-intensity Type A (fixed obstacle)</td> <td>Red</td> </tr> <tr> <td>Low-intensity Type B (fixed obstacle)</td> <td>Red</td> </tr> <tr> <td>Low-intensity Type C (mobile obstacle)</td> <td>Yellow/Blue</td> </tr> <tr> <td>Low-intensity Type D (follow-me vehicle)</td> <td>Yellow</td> </tr> <tr> <td>Low-intensity Type E</td> <td>Red</td> </tr> <tr> <td>Medium-intensity Type A</td> <td>White</td> </tr> <tr> <td>Medium-intensity Type B</td> <td>Red</td> </tr> <tr> <td>Medium-intensity Type C</td> <td>Red</td> </tr> <tr> <td>High-intensity Type A</td> <td>White</td> </tr> <tr> <td>High-intensity Type B</td> <td>White</td> </tr> </tbody> </table>	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	
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High-intensity Type A	White																										
High-intensity Type B	White																										
Ecology																											
An Taisce	Ian Lumley	heritage@antaisce.org / 01 454 1786	<p>Email received from Ian Lumley dated 03.10.21 which states that there are very significant location sensitivities and constraints in Maam area both in ecology and landscape.</p> <p>He also requested a map so that he could circulate to staff members. AOG sent clarification on 04.10.2021. No further response received.</p>																								
Bat Conservation Ireland		info@batconservationireland.org .	No response received to date (18.01.2022).		Chapter: 6																						
Birdwatch Ireland	Oonagh Duggan	info@birdwatchireland.ie / oduggan@birdwatchireland.ie / 01 2819878	SG rang on 14.12.2021. SG was advised by Reception to resend email to Oonagh Duggan, no feedback was received to date.		Chapter: 7																						
Irish Peatland Conservation Council	Tristram Whyte	bogs@ipcc.ie / 045 860 133	SG rang Irish Peatland on 14.12.2021. Reception stated that Irish Peatland would not be sending a response.		Chapter: 8																						
Irish Wildlife Trust		enquiries@iwt.ie / 01 860 2839	Email response received (16.11.2021) stating that:																								

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			'We do not have the capacity to respond to all scoping requests at the moment. We will endeavour to respond if possible.'		
Soils and Water					
Geological Survey Ireland		Duty.Geologist@gsi.ie	SG rang 14.12.2021, left voicemail. No response to date.	See Department of Communications Climate Change and Natural Resources	Chapter: 8
Inland Fisheries Ireland (IFI)	David Harrington, Senior Fisheries Environmental Officer	Davidharrington@fisheriesireland.ie	Email received and re-issued letter to David Harrington as requested on 07.10.2021. Email and Letter of response received 12.11.2021.	<p>The site of this proposed development falls within the Lough Corrib catchment. Lough Corrib is renowned for its wild brown trout and salmon which ascend the tributaries of the catchment annually to spawn and utilise as nursery habitat. Prime water quality and instream habitat is key to salmonids completing this stage of their lifecycle. This is an extremely environmentally sensitive site as the headwaters of the Owenwee River dissect the middle of the proposed windfarm and also border the eastern boundary. Furthermore, it is noted that it is located in an area classed as "Not Normally Permissible" under the Wind Energy Designations the Galway County Development Plan 2015-2021).</p> <p>Please find below our initial concerns and recommendations in relation to the proposed wind farm. IFI require that an EIA will be produced and an EIS prepared for the development to measure and identify its potential impacts on the aquatic environment and mitigate against these to ensure that any impact is minimal or non-existent.</p> <ol style="list-style-type: none"> 1. All watercourses that will receive drainage from the construction sites of the turbines or the access roads must be assessed in terms of aquatic biodiversity with particular emphasis on fish, the food of fish, spawning grounds and fish habitat in general. In this regard changes to river morphology should be avoided unless such changes are approved in advance with Inland Fisheries Ireland and the National Parks and Wildlife Service. 2. The aquatic habitat and physical nature of any watercourse affected by the development must be fully described in detail. This includes areas of open water, pool riffle glide sequences, density and types of aquatic vegetation, description of riparian zones to depth of at least 10 metres on either bank etc. The extent of the surveys should be sufficiently long enough so as to be representative of the habitat contained in that watercourse. There should be a particular focus on sections upstream and downstream of any point where an impact on the watercourse is likely to arise. It may be appropriate to survey a tributary stream and the larger more important streams it joins and assess the effect the discharge might further have on biodiversity and fisheries in the larger streams. Surveys of un-impacted (control) streams should also be included in the Environmental Impact Assessment. 3. Electrofishing surveys will be required for all waters. Quantitative data in relation to all fish species should be compiled. The presence of salmonid species, crayfish and lamprey species will be of particular concern. In undertaking the electrofishing survey only experienced personnel should be employed. Appropriate permits for electrofishing must be obtained from the Department of the Environment, Climate and Communications. Authorised personnel must ensure that they comply with all the conditions contained in the permit. 4. We are concerned about soils, their structure and types around all the turbines, associated access roads and site development. In particular we have concerns about the stability of the soils and the impact that works on both the turbines and access roads will have either directly or by vibration on the stability of the soils. IFI have serious concerns where it is proposed to construct wind turbines on peat soils especially if these peat soils are located on upland areas. 5. IFI strongly recommends that specialist personnel are employed to assess soil strength and suitability of the ground at each site and along any proposed access road. This is particularly important in relation to peat soils. From our experiences we will have serious difficulties with developments on peat soils where there is excessive slope and or where the peat depth exceeds one metre. Excessive slopes will be an issue with all wind farm proposals regardless of soil type. The potential for soil movement and landslides should be assessed fully within the EIS. 6. Particular attention should be paid to the hydrology of any site where excavations including excavations for road construction are being undertaken. It is important that natural flow paths are not interrupted or diverted in such a manner as to give rise to erosion or instability of soils caused by an alteration in water movement either above or below ground. 7. Attention should be paid to drainage during both the construction phase and the operational phase. This includes waters being pumped from foundations or other excavations. It is particularly important during the construction phase that sufficient retention time in the settlement pond is available to ensure no deleterious matter is discharged to any waters. We strongly recommend that settlement 	Chapters: 6, 9

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				<p>ponds are maintained, where appropriate, during the operational phase to allow for the adequate settlement of suspended solids and sediments and prevent any deleterious matter from discharging into any natural waters. In constructing and designing silt traps particular attention should be paid to rainfall levels and intensity. The silt traps should be designed to minimise the movement of silt especially during intense precipitation events where the trap maybe hydraulically overloaded. It is essential that they are located with good access to facilitate monitoring sampling and maintenance. A license to discharge to waters may be required from the local authority.</p> <p>8. We have serious concerns about the construction of roads as these will tend to provide preferential flow paths for surface waters. Considerable attention to detail must be provided in relation to the interception of surface water flows. Our concerns in relation to deleterious matter have been referred to above, but we also have concerns in relation to the flow patterns and to ensuring that normal flows are maintained both during and after construction. Situations can arise where water transportation is significantly increased in certain watercourses thereby putting additional pressures on watercourses and interfering with the sustained flow of water particularly during dry weather. This should be avoided.</p> <p>9. Serious consideration must be given to the disposal of all waste materials such that they will not give rise to any risk. In terms of risk, the placing of soils on adjacent ground should not be permitted unless all the area has been the subject of an in-depth risk assessment. This is of particular concern where peat soils are encountered. Furthermore, drainage from disturbed and stockpiled soils will have to be considered in advance. It may be essential to carry out soil stockpiling operations in confined areas only and to ensure vegetation of the soils with suitable plants which will promote stability. Consideration must be given to runoff/leachate from any stockpiles.</p> <p>10. Details in relation to site offices and the services necessary for the site offices should form part of the EIA. In addition, details relating to operations during the construction phase to contain pollutants should also be considered. It should be noted that cement leachate, hydrocarbon oils and other toxic poisonous materials will require full containment and should not be permitted to discharge to any waters. Please note that physical pollution of watercourses in terms of dumping of unsuitable gravel material or other construction debris in or stockpiling such materials near watercourses is not acceptable as this will interfere with the aquatic habitat.</p> <p>11. The use of sedimentary rocks, such as shale, in road construction should be avoided. This type of material has poor tensile strength and is liable to be crushed by heavy vehicles thereby releasing fine sediment materials into the drainage system which are difficult to precipitate and may give rise to water pollution. We recommend that specialist expertise should advise on the type of material required for road construction bearing in mind the pressures that will arise during the construction phase and the necessity to avoid pollution due to fines washing out into the roadside drainage.</p> <p>12. In relation to watercourse crossings please be advised that this IFI will require to be consulted well in advance in relation to all crossings of any watercourse or the use of any temporary diversions. We strongly recommend that these crossings should be kept to a minimum. We will also require that any instream structures or bridge crossings are approved by the Fisheries IFI. In particular in designing crossings the length, slope and width of any instream structure will be important. Clear span bridges are the preferred option for all crossings especially in upland areas.</p> <p>13. Please also note that any instream works or other works which may impact directly on a watercourse should only be carried out during the open season which is from 1st July to 30th of September each year (so as to avoid impacting on the aquatic habitat during the spawning season). It would be important that appropriate scheduling of works is allowed for.</p> <p>14. The EIS should indicate proposals to monitor the impact on all watercourses within the "development". In the event that environmental damage to the aquatic habitat and associated riparian zone is caused, the EIS should indicate the steps that may be taken to rectify any damage to the aquatic habitat including liaison with the appropriate authorities. In relation to wind farm structures and infrastructure it is important that a sufficient bank side riparian zone is maintained to absorb and attenuate overland flows. In deciding the extent of this riparian zone the following factors would be important:</p> <ol style="list-style-type: none"> 1) Type of soil and its depth and strength especially if the development is on an upland peat bog area. 2) Stock piling or spreading of spoil on unstable soils especially if the soil is peat with a depth greater than 1metre thick. (Geotechnical surveys and assessment at every stage of the operation is essential). 3) Degree or extent of the slope. 4) Variations in the topography that will give rise to point flows (keep flow as diffuse as possible). 5) Extent and nature of catchment above the area of operation. In particular meticulous care should be paid to avoid interfering with the catchment and altering the direction of flow, perhaps to another catchment. 	

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				<p>6) The importance of the water in fisheries and Biodiversity terms. With reference to the aquatic habitat the impact over a distance downstream must also be kept in mind.</p> <p>7) Any other factors that will cause a deleterious effect to the watercourse.</p> <p>8) The extent and proven efficacy of water treatment in relation to the structure.</p> <p>With the above in mind for small streams in upland areas a distance of at least 15 meters should be considered as a bare minimum for a riparian zone. This should be more if the factors above are involved and will require ground truthing and site-specific survey.</p> <p>We suggest that this type of development will comprise works at a number of locations, but the entire development should be considered as a whole. We strongly recommend that discussions should take place with the Environmental Section of the relevant County Council with a view to obtaining a licence to discharge trade effluent from the "building site" to waters. In this regard we consider that drainage waters particularly during the construction phase should be regarded as trade effluent. All effluent should comply with appropriate quality standards.</p> <p>The discharge of polluting or deleterious matter to any watercourse except under and in accordance with a license may be an offence under the Fisheries Acts and/or under the Water Pollution Acts. It should be noted that even if an effluent does generally comply with the quality standards contained in a license it may still cause pollution if the receiving water cannot provide sufficient assimilative capacity. With this in mind the environment impact assessment should also focus on the physical characteristics of water-courses and their ability to assimilate any pollutants discharged from the site including the discharge of water from any foundation works etc.</p> <p>Should works be approved a detailed method statement addressing the issues outlined above, including all mitigations measures, precautions and environmental incident procedures must be forwarded to Inland Fisheries Ireland before works commence.</p> <p>The above comments and observations are generic and the specific requirements will vary with each application. It should not be considered that addressing all of the above issues will influence IFI in any decision it may make in relation to any proposed windfarm development. IFI's primary concern is to protect the aquatic species and habitat, including water quality and the related riparian zone. IFI reserves the right to request additional information in relation to the development should further points arise.</p> <p>At all times the precautionary principle should be applied throughout for the entire development. Particular attention should be paid to the various environmental directives including the Water Framework Directive. The Fisheries Acts in particular and the Local Government (Water Pollution) Acts and all other environmental legislation should be considered as appropriate. As indicated in some of the points above site management and environmental plans will be important issues especially during the construction phase and we recommend that these issues should also receive consideration when preparing and EIA.</p> <p>We recommend that the above issues should be amongst the issues addressed in a comprehensive manner in the EIA.</p>	
Other					
Irish Water	Kieran O'Regan, Development Management Planning	operations@water.ie / 01 892 5000	Email and Response received 02.11.2021.	<p>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 EIA/Chapter where relevant;</p> <ol style="list-style-type: none"> Where the development proposal has the potential to impact an IW Drinking Water Source(s) the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to IW's Drinking Water Source during construction and operational phases of the development. Hydrological/hydrogeological pathways between your site and receiving waters should be identified. Where the development proposal includes backfilling of materials, the waste sampling strategy for the proposed development to ensure the material is inert. Mitigation proposed for any potential negative impacts on any water source(s), in proximity including the environmental management plan and incident response. Any and all potential impacts on the nearby reservoir as public water supply water source(s) is assessed, including any impact on hydrogeology and any groundwater/ surface water interactions. 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 	Chapter: 9

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				<p>(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/</p> <p>f. Any up-grading of water services infrastructure that would be required to accommodate the development.</p> <p>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.</p> <p>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.</p> <p>i. Any physical impact on IW assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.</p> <p>j. If you are considering a development proposal, you are advised to determine the location of public water services assets, possible connection points from your site/lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance 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.</p> <p>k. Any potential impacts on the assimilative capacity of receiving waters in relation to IW discharge outfalls including changes in dispersion /circulation characterises. Hydrological/hydrogeological pathways between your site and receiving waters should be identified.</p> <p>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.</p> <p>m. Where a development proposes to connect to an IW network and that network either abstracts water from or discharges wastewater “p”/ v , consideration as to whether the integrity of the site/conservation objectives of the site would be compromised.</p> <p>n. Mitigation measures in relation to any of the above ensuring a zero risk to any IW drinking water sources (Surface and Ground water).</p> <p><i>This is not an exhaustive list.</i></p> <p>Please note;</p> <ul style="list-style-type: none"> Where connection(s) to the public network is required as part of your development proposal, applicants are advised to complete the Pre Connection Enquiry process and have received a Confirmation of feasibility letter from Irish Water ahead of any planning application. Irish Water will not accept new surface water discharges to combined sewer networks 	
Health Service Executive	Séamus Mitchell Senior Environmental Health Officer Environmental Health Service	seamus.mitchell@hse.ie 074 912 3759	Response Letter and Report received by email on 12.01.2021.	<p>General Introduction</p> <p>The following documents should be taken into consideration when preparing the Environmental Impact Assessment Report:</p> <ul style="list-style-type: none"> Guidelines on the information to be contained in EIS (2002), 187kb Advice Notes on Current Practice in the preparation of EIS (2003), 435kb Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment <p>https://www.housing.eov.ie/sites/default/files/publications/files/guidelinesfor olannine 11inimize11 es and an bord oleanéla on carrying out eia - aueust 2018.Ddf</p> <p>EU publication: Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017. http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf</p> <p>Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the above guidelines. The draft new guidelines can be seen at:</p> <p>http://www.epa.ie/pubs/consultation/reviewofdraftEISRuidelinesadvicenotes</p>	Chapters: 2, 3, 4, 5, 8, 9, 10, 12

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				<p>Generally the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:</p> <ul style="list-style-type: none"> a) Description of the receiving environment; b) The nature and scale of the impact; c) An assessment of the significance of the impact; d) Proposed mitigation measures; e) Residual impacts. <p>Directive 2014/52/EU has an enhanced requirement to assess likely significant impacts on Population and Human Health. It is the experience of the Environmental Health Service (EHS) that impacts on human health are often inadequately assessed in EIAs in Ireland. It is recommended that the wider determinants of health and wellbeing are considered in a proportionate manner when considering the EIA. Guidance on wider determinants of health can be found at www.publichealth.ie</p> <p>In addition to any likely significant negative impacts from the proposed development, any positive likely significant impacts should also be assessed.</p> <p>The HSE will consider the final EIAR accompanying the planning application and will make comments to Galway County Council on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact.</p> <p>This report only comments on Environmental Health Impacts of the proposed development. It is based on an assessment of the correspondence submitted to this office dated 28 h September 2021.</p> <p>The Environmental Health Service (EHS) recommends that the following matters are included and assessed in the EIAR:</p> <ul style="list-style-type: none"> • Public Consultation • Decommissioning phase • Siting and location of turbines • Opportunity for Health Gain • Noise & Vibration • Shadow Flicker • Air Quality • Surface and Groundwater Quality • Geological Impacts • Ancillary facilities • Cumulative impacts <p>Public Consultation</p> <p>It is strongly recommended that early and meaningful public consultation with the local community should be carried out to ensure all potentially significant impacts have been adequately addressed. It is noted that the nearest sensitive receptors (dwellings) are indicated in Figure 14.1 of the Scoping Report, with 29 receptors located within 2km of the proposed windfarm development.</p> <p>All parties affected by the proposed development, including those who may benefit financially from the project, must be fully informed of what the proposal entails, especially with regard to potential impacts on surrounding areas.</p> <p>Sensitive receptors and other stakeholders should be identified to ensure all necessary and appropriate mitigation measures are put in place to avoid any complaints about the proposed wind farm development in the future.</p> <p>It is acknowledged that restrictions around public gatherings as a result of Covid 19 prevention measures may impact on opportunities for public consultation events. However it is expected that meaningful public consultation, where the local community is fully informed of the proposed development, will be</p>	

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				<p>undertaken. Members of the public should be given sufficient opportunities to express their views on the proposed wind farm.</p> <p>The Environmental Impact Assessment Report (EIAR) should clearly demonstrate the link between public consultations and how those consultations have influenced the decision-making process in the EIA.</p> <p>To assist with the consultation and planning process it is recommended that the applicant develops a dedicated website for the proposed wind energy project. All correspondence, maps, project updates and documentation including the EIAR should be uploaded to this site.</p> <p>Decommissioning Phase The proposed operational lifetime of the wind farm should be indicated in the EIAR.</p> <p>The EIAR should detail what the eventual fate of the turbines and associated material will be, i.e. will the material be recycled or how will it be disposed of.</p> <p>Information should also be provided regarding the proposed methodology to be used for the disposal of the materials forming the foundations of the wind turbines. The EIAR should indicate the proposed future use of the wind farm site at the end of the planning permission period.</p> <p>Siting, Location and details of Turbines The EIAR should include a map and a description of the proposed location of each of the proposed wind turbines within the 94.2 hectare site. Indicative Turbine Co-ordinates are included in Table 5.1 of the Scoping Report. Any variance from these locations should be described in the EIAR. The Environmental Health Service expects that details (e.g. height and model) of the turbines to be installed, will be available at the time planning permission is sought and will be included in the EIAR.</p> <p>Details of turbine foundation structures, including depth, quantity and material to be used should be included in the EIAR.</p> <p>Opportunity for Health Gain The EPA has issued guidance with regard to meeting the requirements of Directive 2014/52/EU which assesses the impact of certain public and private projects on the environment. The proposed development should be assessed with a view to the potential to include opportunities for health gain within the site of the proposed wind farm by including greenways, cycle-paths or walking trails within the development site.</p> <p>Assessment of Consideration of Alternatives The EIAR should consider an assessment of alternatives. It is noted that 'Alternatives Considered' will be assessed in Chapter 3 of the EIAR. The EHS recommends that alternative renewable energy options to on shore wind farms should be assessed as part of the EIAR.</p> <p>Noise & Vibration The potential impacts for noise and vibration from the proposed development on all noise sensitive locations must be clearly identified in the EIAR. Impacts during both the proposed construction phase and the operational phase should be addressed. The EIAR must also consider the appropriateness and effectiveness of all proposed mitigation measures to minimize noise and vibration.</p> <p>A baseline noise monitoring survey should be undertaken to establish the existing background noise levels. Noise from any existing turbines in the area should not be included as part of the background levels.</p>	

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				<p>In addition, an assessment of the predicted noise impacts during the construction phase and the operational phase of the proposed wind farm development must be undertaken and detail the change in the noise environment resulting from the proposed wind farm development.</p> <p>The Draft Revised Wind Energy Development Guidelines were published in December 2019. Whilst these have yet to be adopted, any proposed wind farm development should have consideration of the draft Guidelines.</p> <p>https://www.housing.gov.ie/sites/default/files/public-consultation/files/draft_revised_wind_energy_development_guidelines_14inimize_2019.Ddf</p> <p>Shadow Flicker It is recommended that a shadow flicker assessment is undertaken to identify any dwellings and sensitive receptors which may be impacted by shadow flicker. The assessment must include all proposed mitigation measures. Dwellings should include all occupied properties and any existing or proposed properties for which planning consent has been granted for construction or refurbishment.</p> <p>It is recommended that turbine selection will be based on the most advanced available technology that permits shut down during times when residents are exposed to shadow flicker. As a result no dwelling should be exposed to shadow flicker.</p> <p>Air Quality Due to the nature of the proposed construction works generation of airborne dust has the potential to have significant impacts on sensitive receptors. A Construction Environmental Management Plan (CEMP) should be included in the EIAR which details dust control and mitigation measures. Measures should include:</p> <ul style="list-style-type: none"> • Sweeping of hard road surfaces. • Provision of a water bowser on site, regular spraying of haul roads. • Wheel washing facilities at site exit. • Restrict speed on site. • Provide covers to all delivery trucks to minimize dust generation. • Inspect and clean public roads in the vicinity if necessary. • Material stockpiling provided with adequate protection from the wind. • Dust monitoring at the site boundary. • Truck inspection and maintenance plan. • Details of a road maintenance agreement between the wind farm operator and the Local Roads Authority to clarify responsibility for the upkeep and repair of access roads during the construction phase of the project. <p>Surface and Ground Water Quality The proposed development has the potential to have a significant impact on the quality of both surface and ground water. All drinking water sources, both surface and ground water, must be identified. Public, Group Water Scheme and Private Sources and supplies should be identified. Measures to ensure that all sources and supplies are protected should be described. The Environmental Health Service recommends that a walk over survey of the site is undertaken in addition to a desktop analysis of Geological Survey of Ireland data in order to identify the location of private wells used for drinking water purposes. Any potential significant impacts to drinking water sources should be assessed. Details of bedrock, overburden, vulnerability, groundwater flows, aquifers and catchment areas should be considered when assessing potential impacts and any proposed mitigation measures.</p> <p>Geological impacts A detailed assessment of the current ground stability of the site for the proposed wind farm extension and all proposed mitigation measures should be detailed in the EIAR. The assessment should include the</p>	

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				<p>impact construction work may have on the future stability of ground conditions, taking into consideration extreme weather events, site drainage and the potential for soil erosion.</p> <p>Reference is made to a peat slide which occurred near Ballybofey in Co. Donegal on November 13th 2020 which may have been linked to construction activity at Meenbog Wind Farm. Potential impacts on water supply associated with contamination following a peat slide include sedimentation and alteration of Ph levels.</p> <p>The Environmental Health Service recommends that a detailed Peat Stability Assessment should be undertaken to assess the suitability of the soil for the proposed development. The EIAR should include provision for a peat stability monitoring programme to identify early signs of potential bog slides ('pre-failure indicators' see the Scottish Government's 'Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Developments 2017)</p> <p>https://www.eov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2017/04/peat-landslide-hazard-risk-assessments-best-practice-guide-proposed-electricity/documents/00517176-pdf/00517176-pdf/eovscot%3Adocument/00517176.pdf</p> <p>Ancillary Facilities The EIAR should include details of the location of all site office, construction compound, fuel storage depot, sanitary accommodation and canteen, First Aid facilities, disposal of wastewater and the provision of a potable water supply to the site canteen.</p> <p>Cumulative Impacts The Technical Report indicates that there are a number of existing wind farms within the vicinity of the proposed development. All existing or proposed wind farm developments in the vicinity should be clearly identified in the EIAR.</p> <p>The impact on sensitive receptors of the proposed development combined with other wind farm developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed renewable energy development.</p> <p>The EIAR should state clearly if there is any future proposal to further extend the proposed Tullaghmore Wind Farm.</p>	
Transport Infrastructure Ireland	Alban Mills, Administration Executive	info@tii.ie / 01 646 3600	Email received on 27.10.2021 stating they could not access dropbox. Email received on 02.11.2021 stating 'TII's submission of 27 June 2021 should capture all circumstances and, therefore, TII do not require copy of Scoping Report'.	<p>National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. In addition, Chapter 7 'Enhanced Regional Accessibility' of the National Development Plan, 2021 – 2030, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. This requirement is further reflected in the publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).</p> <p>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.</p> <p>The developer/scheme promoter should have regard, inter alia, to the following:</p> <ul style="list-style-type: none"> • 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. In accordance with the provisions of official policy, no direct access or intensification of direct access to national roads should occur. • The developer should assess visual impacts from existing national roads. 	Chapter: 13

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				<p>RECEIVED 20/10/2023</p> <ul style="list-style-type: none"> 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, the 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 the 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. <p>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.</p> <p>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.</p> <p>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 (eg. 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.</p> <ul style="list-style-type: none"> Any 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. <p>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</p>	

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				<p>Development Plan, 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'.</p> <p>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.</p> <p>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. TII, therefore, advises that grid connection cable routing should seek to utilise available alternatives, as opposed to the strategic national road network, contrary to the provisions of official policy.</p> <p>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.</p> <p>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.</p>	
Údarás na Gaeltachta	-	dnag@udaras.ie / 074 956 0100	Email receipt received on 28.09.2021 saying that the email was being forwarded to Planning. No response received to date.		
Environmental Protection Agency	Rachel Neeson	info@epa.ie / 021 487 5540	SG rang EPA on 14 December. Reception gave Rachel Neeson as a direct contact. SG left voicemail for Rachel Neeson and also resent email to her at r.neeson@epa.ie . No feedback received.		
Department of Housing Planning and Local Government	Caoimhe Barrett, Minister of State office	minister@housing.gov.ie	Email received on 28.09.2021 confirming receipt of Scoping Letter, which was brought to the Ministers Attention.		
Corporate Support Unit Department of Communications Climate Change and Natural Resources	Enda Brady	corporatesupport.unit@dcae.gov.ie / 01 678 3217	Email Response received 18.11.2021. Report and Dataset Sheet received.	<p>Response highlighted that there is a County Geological Sites (CGSs) close to the site boundary:</p> <p>Lough Corrib, Co. Galway (GR 118000, 244185), under IGH themes: IGH14 Fluvial and Lacustrine Geomorphology, IGH1 Karst, IGH7 Quaternary. A large lake situated between County Galway's western acidic uplands and the limestone lowlands. Lough Corrib is of international conservation importance, particularly for its lakeshore karst assemblages and its hard-water lake habitat. Link to Site Report: GY093.</p> <p>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.</p> <p>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.</p> <p>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</p>	Chapters: 6, 8, 9

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				<p>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.</p> <p>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.</p> <p>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 which 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.</p> <p>Geohazards Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so. 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 area of the wind farm. The Landslide Susceptibility map indicates variable landslide susceptibility within the proposed wind farm development boundary, including areas of 'Moderately High' to 'High' susceptibility. 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.</p> <p>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.</p> <p>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 wind farm are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.</p> <p>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).</p>	

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				<p>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. Should any significant bedrock cuttings be created, we would ask that they will be designed to remain visible as rock exposure rather than covered with soil and vegetated, in accordance with safety guidelines and engineering constraints. In areas where natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface and could be included as additional sites of the geoheritage dataset, if appropriate. Alternatively, we ask that a digital photographic record of significant new excavations could be provided. Potential visits from Geological Survey Ireland to personally document exposures could also be arranged. The data would be added to 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 Geological Mapping Unit, at GeologicalMappingInfo@gsi.ie, 01-678 2795.</p>	
Fáilte Ireland	Yvonne Jackson	planning.applications@failteireland.ie / 01 554 7224	SG rang on 14.12.2021, there was a message on voicemail that they were all working remotely. No response to date.		
OPW (Office for Public Works)	Karen Donovan	drainage.admin@opw.ie	Email Response received 04.10.2021. OPW sent in a report with their comments listed.	<p>If any new culverts or bridges (or modifications to any existing culverts or bridges) are required to cross watercourses as part of the development or on proposed or existing access roads to serve or access the development, you should be aware that these require consent from the Commissioners of Public Works. This is a requirement of Section 50 of the Arterial Drainage Act of 1945 as amended.</p> <p>Further information on the process including copies of the appropriate application form and brochure are available on our website at https://www.gov.ie/en/publication/957aa7-consent-requirements-constructuralalterationof-watercourse-infrastru/</p> <p>Please note that, in the context of seeking consent under Section 50, the current required design standard for bridges or culverts is based on the flood with an annual exceedance probability of 1% (often referred to as the 100 year flood), increased by 20% to cater for the effects of Climate Change. Bridges or culverts are required to be able to convey this design flood without significantly altering the hydraulic characteristics of the watercourse – further details on this issue are available in the brochure and can be clarified depending on the circumstances of any particular proposed bridge or culvert.</p> <p>You should be aware that a grant of Planning Permission by a planning authority for a development which contains bridges or culverts does not confer section 50 consent on the applicant, nor does it absolve the applicant from the requirement to obtain such consent from the Commissioners.</p> <p>With regard to any proposed Grid Connection Route which may cross several watercourses. If the cable and ducting are to be buried in the road, as they cross bridges over the water courses, and there is no interference with the opening in the bridge spanning the watercourse, then there is no issue. On the other hand, if it is proposed to pass the cable in its ducting through the opening of any bridge or culvert, this would be considered to be a modification of a bridge and it would require the consent of the Commissioners under Section 50 as mentioned above. Similarly, if it is proposed to carry the cable in its ducting across watercourses on new support structures spanning the watercourses, these should be treated as if they are bridges, and the consent of the commissioners under Section 50 should be obtained. If the cable and ducting is to be buried under the natural bed of the watercourses being crossed, Section 50 would not apply, and we would recommend that the duct be buried a sufficient distance below the natural bed to allow for erosion and mobility of the stream bed.</p> <p>We would recommend that a flood risk assessment be carried out with regard to the proposed development and its construction. This should consider all sources, pathways and receptors of flood risk. This should be carried out in accordance with the principles set out in the guideline document "The Planning System and Flood Risk Management" as published by the Minister for the Environment, Heritage and Local Government and the Office of Public Works. Please be aware that this is a separate issue from the requirement to obtain Section 50 consent as mentioned above.</p>	Chapter: 9

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				<p>In terms of the preparation of an EIA, the matters referred to above principally relate to the Hydrology Section, and the Risk of Flooding on a development such as this can impact on Landscape (e.g. landslides that have been reported in recent years), Infrastructure (roads and bridges) and people and their homes, among other things. The aim of the Section 50 process, and the Flood Risk Assessment which is recommended would be to mitigate any increased risk of flooding and the consequences of same, as arising from the proposed development.</p>	
The Heritage Council		mail@heritagecouncil.ie / 056 777 0777	<p>SG rang on 14.12.2021, message on voicemail all working remotely. No response received to date.</p>		
Department Tourism, Culture, Arts, Gaeltacht, Sports & Media	Diarmuid Buttimer, Executive Officer	Manager.DAU@housing.gov.ie	<p>Email response received from Diarmuid Buttimer on 19.11.2021 listing recommendations for the mentioned pre-planning application.</p>	<p>Nature Conservation The Department refers to your correspondence on the 29th September 2021 and your request for observations on the preparation of the EIAR. Based on the information currently available about the location of the proposed development, it is the Department's view that a Natura Impact Statement (NIS) will also be required.</p> <p>As an initial response to your consultation, you are advised to consult the 'Planning' section of the NPWS website - https://www.npws.ie/development%20consultations - as this contains text/advice on consulting NPWS in relation to 'development applications', data and information sources, and the basic elements of environmental assessments that may be required.</p> <p>The following scoping comments are made in the context of this Department's role in relation to nature conservation. The observations are intended to assist you in relation to identifying potential impacts on European sites, other nature conservation sites, and biodiversity and environmental protection in general, in the context of the current proposal. Data collected and surveys carried out in connection with this proposed development may raise other issues that have not been considered here. The observations are not exhaustive and are made without prejudice to any recommendation that may be made by this Department in the future.</p> <p>In general, any new standards, guidance and legislation of relevance should be taken into account, noting in particular any changes in approach required as a result of case law in relation to the EIA and AA processes in particular. The EIAR and NIS should reflect the current baseline environment and include detailed assessment and analysis of cumulative or in combination effects as they now stand.</p> <p>Observations are set out under the following headings:</p> <ol style="list-style-type: none"> 1. Matters relating to the EIAR; 2. Matters relating to Appropriate Assessment; 3. Site specific observations <p>1. Guidance on EIAR You are advised to consult the European Commission's (2017) 'Environmental Impact Assessment: Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU)'. Any surveys and assessments should be based on a full details of the overall project, noting all lands that will be required. For a detailed list of potential considerations, see the 'Review checklist', and specifically 'Section 1 – Description of the project', in this guidance. Note also that if compensatory afforestation is required on other lands, the likely significant effects of that integral element of the development should be assessed in the main project EIAR.</p> <p>The following should also be taken into account in planning and designing a wind farm and in completing the assessments. Please note the 2020 updates of the Guidance documents:</p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>Guidance document on wind energy developments and EU nature legislation</i> (European Commission, 2020) <input type="checkbox"/> <i>Draft Revised Wind Energy Development Guidelines</i> (DoHLGH, 2020), particularly the requirements in relation to assessing ground conditions/geology (section 5.3) <input type="checkbox"/> <i>Landslides in Ireland</i> (GSI, 2006)1. <p>1 Creighton, R. (ed.). 2006. <i>Landslides in Ireland: A Report of the Irish Landslide Working Group</i>. Geological Survey of Ireland, Dublin.</p> <p>1.1. Project planning and design It should be remembered that a key element of EIA is the avoidance or reduction of negative effects on the environment. EIA is an iterative process and the information gathered through assessments or surveys should be used to guide the planning and design of the wind farm so that sensitive ecological or hydrological</p>	Chapters: 6, 7, 8, 9

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				<p>areas are avoided, and negative impacts are minimised insofar as is possible. The size, layout and design of the proposed development should be informed by a constraints-type study and the compilation of an environmental constraints map that identifies and avoids, insofar as is possible and using appropriate separation distances, all nature conservation sites, other sensitive ecological and hydrological features, deep or intact peat deposits, and areas of wet and/or active bog, pool systems and flushes.</p> <p>The National Biodiversity Action Plan 2017- 2021 aims to conserve and restore Ireland's biodiversity. A key objective of the plan is to achieve; no net contribution to biodiversity loss arising from development projects occurring within the lifetime of the plan. Accordingly, the EIAR should outline how this project will avoid a net loss of biodiversity and include relevant mitigation and or compensatory measures where necessary.</p> <p>1.2 Project components In general, the EIAR should include sufficient project details so that the full nature and extent of the likely significant effects are clear and assessed fully in relation to, among other things, road design and construction methodology; site drainage details, including settlement ponds; temporary and permanent storage or disposal areas for peat and other materials or wastes arising; extraction sites/borrow pits; and any modifications to roads, bridges or culverts along the entire length of haul routes. Volumes of surplus material arising and of fill required should be calculated. Due consideration should also be given to the grid connection.</p> <p>The Department notes that the location map provided is for an area of peatland. The EIAR should give specific consideration to the mobilisation of silt and changes to the stability of peat. The proposed windfarm has the potential for significant changes in patterns of surface water flow and may desiccate the peat allowing pathways to open up resulting in subsurface water losses. It should be noted that in 2020 a number of major upland peatland (blanket bog) landslides occurred across Ireland, most notably on Shass Mountain near Drumkeeran in County Leitrim² and Meenbog, near Ballybofey in County Donegal. The Peat Stability Risk Assessment must be considered in light of these occurrences with consideration of climate change predictions (e.g. rainfall level) in the hazard rating and should thoroughly assess risk with regard to change in weather patterns due to climate change such as more frequent and intense storms and rainfall events, increased likelihood and magnitude of river flooding, prolonged periods of dry conditions which may increase the likelihood of unstable peat.</p> <p>² https://www.npws.ie/news/shass-mountain-peat-landslide-report-published</p> <p>Detailed consideration should be given to the amount of peat to be excavated, stored, and disposed/recovered. A detailed plan for the safe storage, disposal and rehabilitation of excavated or disturbed peat should form part of the EIAR. The spreading or recovery of excavated peat on areas of intact bog, wet and revegetated areas of cutover bog or other habitats or vegetation of ecological value is unlikely to be acceptable. Excavated or exposed peat should not pose any threat to surface waters and water quality. Any proposals to combine peat disposal with habitat restoration or rehabilitation measures will require a detailed plan to show the location, nature and area of lands in question, and provide details of how such areas will be reinstated, managed and improved for habitats and/or species, together with proposals for monitoring and reporting. This plan should be prepared by a suitably qualified ecologist in consultation with hydrologists and other experts as appropriate.</p> <p>A detailed site drainage map will be required and should show all existing watercourses, drainage ditches, flushes, lakes or ponds; new drainage ditches; all outfall points to watercourses or lakes; and all settlement ponds. The EIAR must demonstrate that the proposed wind farm development will not pose any threat to surface waters and associated species (e.g. Salmon). Any impact on water table levels or groundwater flows may impact on wetland sites some distance away. The EIAR should assess cumulative impacts with other plans or projects, if applicable. Where negative impacts are identified suitable mitigation measures should be detailed as appropriate.</p> <p>The associated impacts of quarrying or extraction should be included among the considerations at the earliest stages of project planning and design, and should be assessed fully in the EIAR. Reinstatement or restoration plans will be required for any quarries or borrow pits on-site and should be included in the EIAR. As with any other part of the development, all borrow pits (existing or proposed) to be used in construction should be included within the application area for the proposed development.</p> <p>Any tree felling of forested sites should be included as an intrinsic element of the overall development, the impacts and implications of which should be assessed fully in the EIAR. The extent of tree felling should be mapped, and the future use and management of all cleared areas should be specified. The impacts of tree felling on wildlife, habitats and surface waters (e.g. water quality) should be assessed fully, including the risk of Phosphate mobilisation from peat soils as a result of tree clearance and ground disturbance.</p>	

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				<p>Tree felling is licensed and regulated by the Forest Service; any additional requirements in respect of this element of the proposed development, including any obligations to replant on other lands, should be made known at the planning application stage, and assessed as part of the EIAR as appropriate. If restoration of planted areas is proposed as mitigation or compensation for negative ecological effects, the EIAR should include a detailed plan to show the location, nature and area of habitat to be reinstated, and provide details of how such areas will be reinstated, managed and improved for habitats and/or species, together with proposals for monitoring and reporting. This plan should be prepared by a suitably qualified ecologist in consultation with other experts as appropriate. Consideration should be given within this context of no net loss to biodiversity and with that opportunities for establishment of native woodland as replacement planting rather than coniferous planting.</p> <p>The likely impacts of grid connection, particularly for birds, sensitive habitats and surface waters, should be given due consideration at the EIA stage and the options for routes and particularly river crossings considered within the EIAR study area.</p> <p>Any improvement or reinforcement works required for access and transport anywhere along the proposed haul route(s) should be included in the EIAR and subjected to ecological impact assessment with the inclusion of mitigation measures, as appropriate.</p> <p>Any losses of biodiversity habitat associated with this proposed development (including access roads and cabling etc.) such as woodland, scrub, hedgerows and other habitats should be mitigated for. In addition, Annex 1 habitats which occur outside the Natura 2000 network are important in terms of biodiversity conservation. The presence of any Annex I habitats outside the network should be given due consideration as part of the consideration of biodiversity matters generally for the proposed development. The loss of Annex 1 habitats outside SACs should be avoided wherever possible.</p> <p>Impacts of lighting on-site should also be assessed noting that lighting of turbines and masts can increase collision risk³.</p> <p>³ Douse, A (2020) "The Effect of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures", NatureScot Information Note. Version 1.1</p> <p>You are advised that no disturbing or damaging site or ground investigations, or testing, should take place in an ecological site, including national (NHA) and European sites (SAC and SPA), in advance of the main project consent without due consideration of the need for planning permission (for exempted development where there are restrictions on exemptions), or another consent.</p> <p>1.3 Ecological Data and Surveys Along with the standard NPWS data requests which is recommended, other sources of habitat and species information beyond those already identified include (but are not be limited to): the National Biodiversity Data Centre (www.biodiversityireland.ie), Inland Fisheries Ireland (www.fisheriesireland.ie), BirdWatch Ireland (www.birdwatchireland.ie), Irish Raptor Study Group, Golden Eagle Trust and Bat Conservation Ireland (www.batconservationireland.org).</p> <p>It is expected by this Department that best practice will be adhered to with regard to survey methodology and if necessary non Irish methodology adapted for the Irish situation, noting specific gaps in relation to species and age of the data outlined in some guidance documents. The EIAR should cover the whole project, including construction, operation and, if applicable, restoration or decommissioning phases. Inland Fisheries Ireland should be consulted with regard to fish species, if applicable. For information on Geological and Geomorphological sites, the Geological Survey of Ireland, should be consulted.</p> <p>Where ex-situ impacts are possible, survey work may be required, outside of the development sites. Such surveys should be carried out by suitably qualified persons at an appropriate time of the year, depending on the species being surveyed for. The EIAR should include the results of the surveys and detail the survey methodology and timing of such surveys including consistency in terms of timed vantage point surveys.</p> <p>1.3.1 Ornithology Surveys for all species should cover bird usage and facilitate assessment of potential collision risk, habitat loss, barrier effect and displacement for these species and should be based around the daily and seasonal activity patterns of the species being surveyed. Survey work should cover year-round (wintering, migration and breeding) site use and should cover a minimum of two years to allow for an accurate determination of site usage.</p> <p>Vantage point surveys should be done in a manner that ensures sufficient data is collected to allow an assessment of the importance of all the flight paths into, out of and between sites and assess migratory</p>	

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				<p>movements. Consequently, the Department recommends that a visibility analysis of topography and vegetation is used in the selection of vantage points for ornithological surveys. Technological solutions should also be considered in conjunction with VPs surveys to ensure sufficient data is compiled for assessment. Results for species need to be referenced back to the overall populations and their dynamics as, in some cases even a small risk to a population of a species could be considered significant.</p> <p>When completing impact assessment for birds, assessment and monitoring results from nearby wind farms must be considered. Cumulative impact on birds from all wind farms in the area needs to be assessed and the data from surrounding sites needs to be considered in the assessment. This is of particular note due to the high density of wind farms in the area. Further site specific detail is included in Section 3.</p> <p>1.3.2 Bats Bat roosts may be present in trees, buildings and bridges. Bat species are protected under the Wildlife Act 1976 to 2018, and are subject to a regime of strict protection pursuant to the requirements of the Habitats Directive (92/43/EEC) as transposed in Irish law in Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended). Therefore, damage/disturbance to any such roosts must be avoided in the first instance. While the Minister may grant a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011-2015, a licence can only be granted once a number of strict criteria have been met (see Regulation 54). An assessment of the impact of the proposed wind farm on bat species should be carried out noting recent guidance available, "Bat and Onshore Wind Turbines: Survey, Assessment and Mitigation, 2019" published jointly by Scottish Natural Heritage and Bat Conservation Trust and other stakeholders.</p> <p>1.3.3 Watercourses and wetlands Wetlands are important areas for biodiversity and ground and surface water quality should be protected during construction and operation of the proposed development. The EIAR should include a detailed assessment of the hydrological impacts on wetlands from the proposed development. Any watercourse or wetland which may be impacted on should be surveyed for the presence of protected species and species listed on Annexes II and IV of the Habitats Directive. For example, these species could include Otter (<i>Lutra lutra</i>) which are protected under the Wildlife Acts and listed on Annex II and IV of the Habitats Directive, Salmon (<i>Salmo salar</i>), Lamprey (three species in Ireland) listed on Annex II of the Habitats Directive, Freshwater Pearl Mussel (<i>Margaritifera</i> species) and White-clawed Crayfish (<i>Austropotamobius pallipes</i>) which are both protected under the Wildlife Act and listed on Annex II of the Habitats Directive, Frogs (<i>Rana temporaria</i>) and Newts (<i>Triturus vulgaris</i>) protected under the Wildlife Acts and Kingfishers (<i>Alcedo atthis</i>) protected under the Wildlife Acts and listed on Annex I of the Birds Directive (Council Directive 79/409 EEC).</p> <p>Further to potential impacts on the species listed above, for example, one of the main threats identified in the threat response plan for otter is habitat destruction (see https://www.npws.ie/sites/default/files/publications/pdf/2009_Otter_TRP.pdf). A 10m riparian buffer on both banks of a waterway is considered to comprise part of the otter habitat. Therefore any proposed development should be located at least 10m away from a waterway and should consider movements between waterways and waterbodies by otters.</p> <p>1.3.4 Flood plains Flood plains, if present, should be identified in the EIAR and left undeveloped to allow for the protection of these valuable habitats and provide areas for flood water retention (green infrastructure). If applicable, the EIAR should take account of the guidelines for Planning Authorities entitled "The Planning System and Flood Risk Management" published by the Department of the Environment, Heritage and Local Government In November 2009.</p> <p>1.3.5. Hedgerows, Scrub and related habitats Hedgerows and scrub should be maintained where possible, as they form wildlife corridors and provide areas for birds to nest in; hedgerows provide a habitat for woodland flora, roosting places for bats and Badger setts may also be present. The EIAR should provide an estimate of the length/area of any hedgerow/scrub that will be removed. Where it is proposed that trees or hedgerows will be removed there should be suitable planting of native species in mitigation incorporated into the EIAR. Hedgerows, trees, scrub and uncultivated vegetation (including peatland habitats) should not be removed where possible during the nesting season (i.e. March 1st to August 31st), noting the protection afforded under the Wildlife Act 1976-2021.</p> <p>1.3.6. Marsh Fritillary</p>	

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				<p>Marsh fritillary surveys should be carried out as per standard Marsh Fritillary Larval Web Survey methodology.</p> <p>1.3.7. Alien invasive species The EIAR should also address the issue of invasive alien plant and animal species such as <i>Rhododendron ponticum</i> and Japanese Knotweed, and detail the methods required to ensure they are not controlled or spread during survey and or construction. Information on alien Invasive species In Ireland can be found at http://invasives.biodiversityireland.ie/ and at http://invasivespeciesireland.com/.</p> <p>1.4. Impact assessment The impact of the proposed development on the flora/ fauna and habitats present should be assessed with particular regard to: Natura 2000 sites, i.e.: <ul style="list-style-type: none"> o Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) o and Special Protection Areas (SPA) designated under the EC Birds Directive (Council Directive 2009/147 EC), other designated sites, or sites proposed for designation such as, o Natural Heritage Areas; o proposed Natural Heritage Areas; o Nature Reserves, o Refuges for Fauna or Flora designated under the Wildlife Acts 1976 to 2021; o species protected under the Wildlife Acts including protected flora; 'Protected species and natural habitats', as defined in the Environmental Liability Directive (2004/35/EC) and European Communities (Environmental Liability) Regulations, 2008 including <ul style="list-style-type: none"> o Birds Directive - Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur); o Habitats Directive - Annex I habitats, Annex II species and their habitats; o Annex IV species and their breeding sites and resting places (wherever they occur); o important bird areas such as those identified by Birdlife International, features of the landscape which are of major importance for wild flora and fauna, such as those with a "stepping stone" and ecological corridors function, as referenced in Article 10 of the Habitats Directive; o other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plans and County Development Plans); o Red data book species; o and biodiversity in general. </p> <p>1.5. Construction Management Plans and Mitigation Complete project details including Construction Management Plans (CMPs) need to be provided in order to allow an adequate EIAR and appropriate assessment to be undertaken. CMPS should contain sufficient detail to avoid any post construction doubt with regard to the implementation of mitigation measures, timings and roles and responsibilities for same. Any mitigation needs to be included in detail and if being relied upon to reach conclusions must be proved to be achievable and likely to be effective in any given scenario it is needed. Proof of effectiveness will be required with examples of where similar techniques have been employed previously.</p> <p>Applicants need to be able to demonstrate that CMPs and other such plans are adequate, all mitigation is included and effective and supported by scientific information and analysis and that they are feasible within the physical constraints of the site. The positions, locations and sizes of construction infrastructure and mitigation such as settlement ponds, disposal sites and construction compounds may significantly affect European and other designated sites, habitats and species in their own right and could have an effect for example on, drainage, water quality, habitat loss, and disturbance. If these are undetermined at time of the assessment all potential effects of the development on the site are not being considered.</p> <p>Construction work should not be allowed to impact on water quality and measures should be detailed in the EIAR to prevent sediment and/or fuel runoff from getting into watercourses which could adversely impact on aquatic species.</p> <p>Inland Fisheries Ireland (IFI) should be consulted with regard to impacts on fish species and the applicant may find it useful to consult their publication entitled "Planning for watercourses in the urban environment" (2020) which can be downloaded from their web site.</p>	

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				<p>If applicants are not in a position to state the exact location and details of cable routes at the time of application, then they need to consider the range of options (overhead and underground) that may be used within their assessment.</p> <p>The Department draws your attention to the recent High Court decision with respect to the High Court judicial review Sweetman V An Bord Pleanála (2021)IEHC 390 and the appropriate detail of project description required for an EIA.</p> <p>1.6. Post construction monitoring This Department recognises the importance of pre and post construction monitoring, such as recommended in Drewitt et al. (2006), and Bat Conservation Ireland (2012). The applicant should not use any proposed post construction monitoring as mitigation to supplement inadequate information in the assessment. Please refer to Circular Letter PD 2/07 and NPWS 1/07 on this issue. This can be downloaded from the Department's website https://www.npws.ie/development-consultations.</p> <p>The EIAR process should identify any pre and post construction monitoring which should be carried out. The post construction monitoring should include bird and bat strikes/fatalities including the impact on any such results of the removal of carcasses by scavengers. Monitoring results should be made available to the competent authority and copied to this Department. An appropriate plan of action needs to be agreed at planning stage with the Planning Authority if the results in future show a significant mortality of birds and/or bat species. It is important to note that unless post decision consultation with NPWS is specifically stated as a condition of planning, NPWS has no post consent role. However, regional staff are available for liaison regarding any associated licencing requirements and or new information arising for specific species of concern.</p> <p>Note: any significant change to mitigation may require amendment and where a licence has expired; there will be a need for new licence applications for protected species.</p> <p>1.7. Licenses Where there are impacts on protected species and their habitats, resting or breeding places, licenses may be required under the Wildlife Act 1976-2021 or derogations under the EC (Birds and Natural Habitats) Regulations 2011 to 2021.</p> <p>In particular, bats as outlined earlier and otters, are subject to a regime of strict protection pursuant to the requirements of the Habitats Directive (92/43/EEC) as transposed in Irish law in Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations, 2011 to 2021. A copy of Circular Letter NPWS 2/07 entitled "Guidance on Compliance with Regulation 23 of the Habitats Regulations 1997 – strict protection of certain species/applications for derogation licences" can be found on the Departmental web site at www.npws.ie/sites/default/files/general/circular-npws-02-07.pdf. It should be noted that the Regulations of 1997 have since been superseded by the European Communities (Birds and Natural Habitats) Regulations 2011 to 2021. Part 6 of those Regulations is now the relevant section dealing with the protection of flora and fauna. Reference to Regulation 23 in the circular letter should be taken to mean Regulation 51 in the current Regulations.</p> <p>In addition, the EIAR should take account of species protected under sections 21, 22 and 23 of the Wildlife Acts 1976 to 2021 if there are any impacts on other protected species or their resting or breeding places, such as on protected plants, badger setts or birds' nests. And will also need to be cognisant of Article 5 (d) of the Birds Directive. For that reason removal of uncultivated vegetation, including hedges and trees, should be avoided during the nesting season (i.e. March 1st to August 31st).</p> <p>In order to apply for any such licenses or derogations as mentioned above the results of a survey should be submitted to the National Parks and Wildlife Service of this Department. Such surveys are to be carried out by appropriately qualified person/s at an appropriate time of the year. Details of survey methodology should be provided. Should this survey work take place well before construction commences, it is recommended that an additional ecological survey of the development site should take place immediately prior to construction to ensure no significant change in the findings of the baseline ecological survey has occurred. As outlined already, if there has been any significant change mitigation, this may require amendment and where a licence has expired, there will be a need for new licence applications for the protected species.</p> <p>2. Guidance on Appropriate Assessment (AA):</p>	

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				<p>In order to carry out the Appropriate Assessment screening, and/or prepare a Natura Impact Statement (NIS), information about the relevant European sites including their conservation objectives will need to be collected.</p> <p>Screening for appropriate assessment should focus on the likely significant effects of the proposed development and related activities on European sites noting that impacts to sites via air and water may occur over large distances using the source-pathway-receptor model. Details of designated sites and species and conservation objectives can be found on http://www.npws.ie/ 11</p> <p>Site-specific, as opposed to generic, conservation objectives are now available for many sites. Each conservation objective for a qualifying interest (QI) and / or special conservation interest (SCI) habitat or species is defined by a list of attributes and targets and is often supported by further documentation. Where these are not available for a site, an examination of the attributes that are used to define site-specific conservation objectives for the same QIs / SCIs in other sites can be usefully used to ensure the full ecological implications of a proposal for a site's conservation objective and its integrity are assessed. It is advised, as per the notes and guidelines in the site-specific conservation objectives that any reports quoting conservation objectives should give the version number and date, so that it can be ensured and established that the most up-to-date versions including map boundaries⁴ are used in the preparation of Natura Impact Statements and in undertaking appropriate assessments.</p> <p>⁴ https://www.npws.ie/maps-and-data/designated-site-data ⁵ https://ec.europa.eu/environment/nature/natura2000/management/docs/Wind_farms.pdf ⁶ https://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm ⁷ https://ec.europa.eu/environment/nature/natura2000/management/docs/art6/EN_art_6_guide_jun_2019.pdf</p> <p>In addition, the Article 12 and 17 reports under the Birds and Habitats Directives should be referenced https://www.npws.ie/publications. The Departmental guidance document on Appropriate Assessment is available on the NPWS website at https://www.npws.ie/development-consultations and in EU Commission guidance entitled:</p> <ul style="list-style-type: none"> o "Wind energy developments and Natura 2000"⁵ o "Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" (Sept 2021)⁶ o 2018 Commission notice "Managing Natura 2000 sites The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC"⁷ (updated June 2020) <p>More recent CJEU and Irish case law has clarified some issues and should also be consulted.</p> <p>The NIS should present a robust and reasoned scientific assessment and analysis of the implications of the proposals for the relevant conservation objectives of relevant European sites. Best scientific knowledge in the field should be applied to the understanding of the likely effects, and to the assessment and analysis of the implications of the proposals for the conservation objectives and integrity of the sites. When carried out by the competent authority, the appropriate assessment cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the project on European sites.</p> <p>2.1 Cumulative and ex situ impacts A rule of thumb often used is to include all European sites within a distance of 15km. It should be noted however that this will not always be appropriate. In some instances where there are hydrological connections a whole river catchment or a groundwater aquifer may need to be included. Similarly where bird flight paths are involved the impact may be on an SPA more than 15 kilometres away.</p> <p>Other relevant Local Authorities should be consulted to determine if there are any projects or plans which, in combination with this proposed development, could impact on any European sites.</p> <p>Assessment and monitoring results from nearby wind farms should be considered. Cumulative impact from all wind farms in the area needs to be assessed and the data from surrounding sites needs to be considered in the assessment of impacts. The Department recommends the inclusion of a map highlighting the location of all other projects which have been included in the in-combination assessment. An assessment of the potential barrier effects to QI / SCI species, in combination with all the other projects, should also be carried out.</p> <p>3. Site Specific Considerations Ornithology</p>	

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				<p>The Department is concerned about potential impacts on bird species in the vicinity of the proposed development (particularly Special Conservation Interest (SCI) species for Lough Corrib Special Protection Area, SPA Code 004098 and Special Area of Conservation, SAC Code 000534) and the potential for impacts on Annex I species (Birds Directive). Sufficient scientific survey information is required to adequately assess the movements of species between European sites and on migratory routes. Harrier effects can only be assessed following detailed surveys. Water birds such as waders, waterfowl and gulls commute from Lough Corrib to sea inlets to the south-west. Tidal cycles must be factored into the survey design for these species if they are likely to use or pass through the survey area.</p> <p>Target species include Annex I (Birds Directive) species and Birds of Conservation Concern (BoCC)8 such as White Tailed Sea Eagle, Hen Harrier, Merlin, and Red Grouse. NPWS data is available with respect to these. Hinterland surveys therefore should include breeding raptor surveys, including roost watches, surveys for nocturnal species and other species-specific surveys as appropriate. Where appropriate, raptor species should be surveyed using the methodology laid out in Hardey et al. (2013)9. 8 Birds of Conservation Concern in Ireland 4: 2020–2026 Irish Birds 43: 1–22 (2021) 9 Hardey, J., Crick, H., Wernham, C., Riley, H., Etheridge, B. & Thompson, D. 2013. Raptors: a field guide for surveys and monitoring. Edinburgh: The Stationery Office</p> <p>Two years of survey data is a guide to the minimum requirement for assessment of potential affects. Data must be sufficient to support conclusions in the EIAR and NIS reports irrespective of duration and or method required (i.e. more than two years data may be required and additional methods may be required beyond vantage point (VP) and walk over surveys).</p> <p>The proposed development site lies between a number of year-round high-use areas for White-tailed Sea Eagle (WTSE). This species has one of the highest mortality rates at wind farms among raptor species in Europe. Krone and Treu (2018) determined that to avoid frequent collisions at the population scale with wind power plants it was important to construct wind power plants outside the main distribution areas of WTSE's. Krone and Treu (2018) also found that the effect of wind turbine density was amplified in areas of high habitat suitability, for this reason the cumulative effect of both existing and proposed turbines in the region must be taken into account when assessing the potential impacts of the development on WTSE10. Research from Germany (Hötter et al. 2013) shows that a high proportion of white-tailed eagle flight activity is at height risk for turbine collisions11. Flight heights for WTSE must be recorded. 10 Krone, Oliver & Treu, Gabriele. (2018). Movement patterns of white-tailed sea eagles near wind turbines: Sea Eagles and Wind Farms. The Journal of Wildlife Management. 82. 10.1002/jwmg.21488. 11 Hötter, H., Krone, O. & Nehls, G. (2013): Greifvögel und Windkraftanlagen: Problemanalyse und Lösungsvorschläge. Schlussbericht für das Bundesministerium für Umwelt, Naturschutz und Reaktorsicherheit. Michael-Otto-Institut im NABU, Leibniz-Institut für Zoo- und Wildtierforschung, BioConsult SH, Bergenhusen, Berlin, Husum. 12 O'Donoghue, B. 2019. Survey Guide. Irish Hen Harrier Winter Survey. http://ihhws.ie/IHHWS_Guide.pdf 13 Barry Gerard O'Donoghue (2021): Hen Harrier <i>Circus cyaneus</i> ecology and conservation during the non-breeding season in Ireland, Bird Study, DOI: 10.1080/00063657.2021.1874871</p> <p>Hen Harrier (Annex I species and SCI Lough Corrib SPA) have been recorded nearby in winter, during passage months and during the breeding season. There is suitable habitat for breeding Hen Harrier nearby and therefore a dedicated Hen Harrier survey should be undertaken. Hen Harrier have been known to roost communally approx. 8 km of the boundary of the proposed development and have been noted along the N59 between Claremount and Lough Bofin. Surveys for potential Hen Harrier roost should use survey methodology such as O'Donoghue (2019) and reference made to relevant papers such as O'Donoghue (2021) 12, 13.</p> <p>The proposed development site also contains suitable Merlin (Annex I species and SCI Lough Corrib SPA) foraging and breeding habitat. Merlin survey work should begin in March to ensure that birds which may attempt to breed but fail early on in the breeding cycle are not overlooked. VP work alone is not sufficient to determine the absence of Merlin and a dedicated Merlin survey over a minimum of 2 breeding seasons is essential to determine the status of Merlin on the site.</p> <p>Red Grouse have been recorded on the site of the proposed development. A dedicated survey should be undertaken to determine the status of Red Grouse on the site.</p> <p>Connectivity of European sites The project site is located in close proximity to a number of European sites including Connemara Bog Complex SAC (SAC Site Code 002034), Connemara Bog Complex Special Protection Area (SPA Site</p>	

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				<p>Code 004181), Lough Corrib Special Area of Conservation (SAC Site Code 004042) and Lough Corrib Special Protection Area (SPA Site Code 004042).</p> <p>These sites are designated for their extensive wetland systems and dependant species and have conservation objectives to restore habitat condition. Article 10 of the Habitats Directive puts emphasis on the commitment to improve ecological coherence of the Nature 2000 network. Potential impacts (including barrier effect) on the ecological connectivity between these European sites, and other surrounding protected sites, must be considered and assessed.</p> <p>Water Quality The primary water course on site is the Owenwee (Corrib) which has 'Good' WFD status and flows into the Lough Corrib Special Area of Conservation (SAC Site Code 004042) and Lough Corrib Special Protection Area (SPA Site Code 004042). There is potential for impact on the conservation objectives of these European sites, particularly with respect to water-dependent species (SCIs and QIs) and wetland habitat (SCII). Consequently management of surface and sub-surface water, water tables and drainage carries an elevated risk with regard to this proposed development.</p> <p>Freshwater Pearl Mussel The proposed development site is adjacent to, and may have watercourses that flow into, the Corrib-Owenriff <i>Margaritifera</i> Sensitive Area (listed in S.I. 296 of 2009). The species is an Annex II species of the EU Habitats Directive and is critically endangered in Ireland. Alteration of the hydrological regime / watercourses within the catchment can have significant effects on this species through eutrophication and siltation pressures on the water courses. Detailed Freshwater Pearl Mussel surveys will be required where there is hydrological connection with this catchment. Survey methodology should be as per Moorkens and Killeen (2020)¹⁴. Detailed information on the species and assessment requirements are available at https://www.npws.ie/research-projects/animal-species/invertebrates/freshwater-pearl-mussel. -</p>	
Tetra Ireland	Thomas Barry	info@tetraireland.ie	Email response received on 01.10.2021 stating <i>"we anticipate no impact from the development in the area proposed, can you ensure the proposal is also reviewed by eir as we have traffic carried on eir radio links in the area"</i> .		Chapter: 12