

# 1 INTRODUCTION AND METHODOLOGY

## 1.1 Introduction

This Environmental Impact Assessment Report (EIAR) has been commissioned by the Applicant, Milford Quarries Limited, in respect of a quarry development project at a site located in Bannagagole, Old Leighlin, Co. Carlow (the Proposed Development).

This EIAR has been compiled in accordance with all current legislation and best practice guidance. This Chapter describes the methodology by which the Environmental Impact Assessment (EIA) was carried out and the EIAR was completed. The methodology used is broadly consistent across all chapters in order to ensure the EIAR is clear and easy to navigate.

The proposed quarry void will be extracted to a depth of 2 no. benches of c. 10m from top of bedrock, with a final floor level of c. 56.5m above Ordnance Datum (AOD) with a proposed rate of rock extraction of c.30,000 cubic metres (84,000 tonnes) per annum. A proposed working area of c. 1.2 hectares to the south of the extraction zone will provide for the crushing and processing of the unusable stone and storage of dimensional stone and will include machinery storage shed, staff welfare facilities, wastewater holding tank, weighbridge and parking area.

The Proposed Development will also include for earthen screening berms to a height of c. 3 m, a wheelwash facility; installation of surface water attenuation and settlement ponds for the treatment of suspended solids in the floor of the quarry; soil storage area with an average storage depth of c. 4 m and all other site development works above and below ground including the restoration of the final quarry void (extractive area).

Access to the Proposed Development will be facilitated by a heavy goods vehicle (HGV) site entrance from the Local Road to the east of the proposed site via a proposed access haul road.

## 1.1 Definition of EIA and EIAR

Environmental Impact Assessment (EIA) is a systematic examination of the likely significant effects of a Proposed Development on the environment. In assessing the significant effects this EIAR will evaluate the existing situation and assess any likely significant effects of the Proposed Development. Where likely significant effects are identified proposed mitigation measures will be identified. In addition, all elements of the project have been cumulatively assessed together for their overall impact and furthermore, the project has then been assessed in combination with other existing, consented, or planned projects.

Under Schedule 5 of the Planning and Development Regulations 2001, as amended (the Planning Regulations), an EIAR (formerly an EIS) is required to accompany certain planning applications for specified projects as part of the EIA process.

The EIAR describes the outcomes of the iterative EIA process which was progressed in parallel with the project design process. In doing so, it forms the first part of the EIA process that will be completed by Carlow County Council, as the competent authority, which in turn will be required to examine, analyse, and evaluate the direct and indirect effects of the development on the various factors listed in Directive 2011/92/EU, as amended by 2014/52/EU (the EIA Directive).

*"The EIAR should be prepared at a stage in the design process where changes can still be made to avoid adverse effects. This often results in the modification of the project to avoid or reduce effects through redesign" (EPA, 2022)*

Where significant and likely environmental effects are identified that are unacceptable, the EIA process aims to quantify and minimise the effects of the impact that the specified development has on the environment through appropriate mitigation measures and where necessary, subsequent monitoring.

This process is illustrated in Figure 1-1.

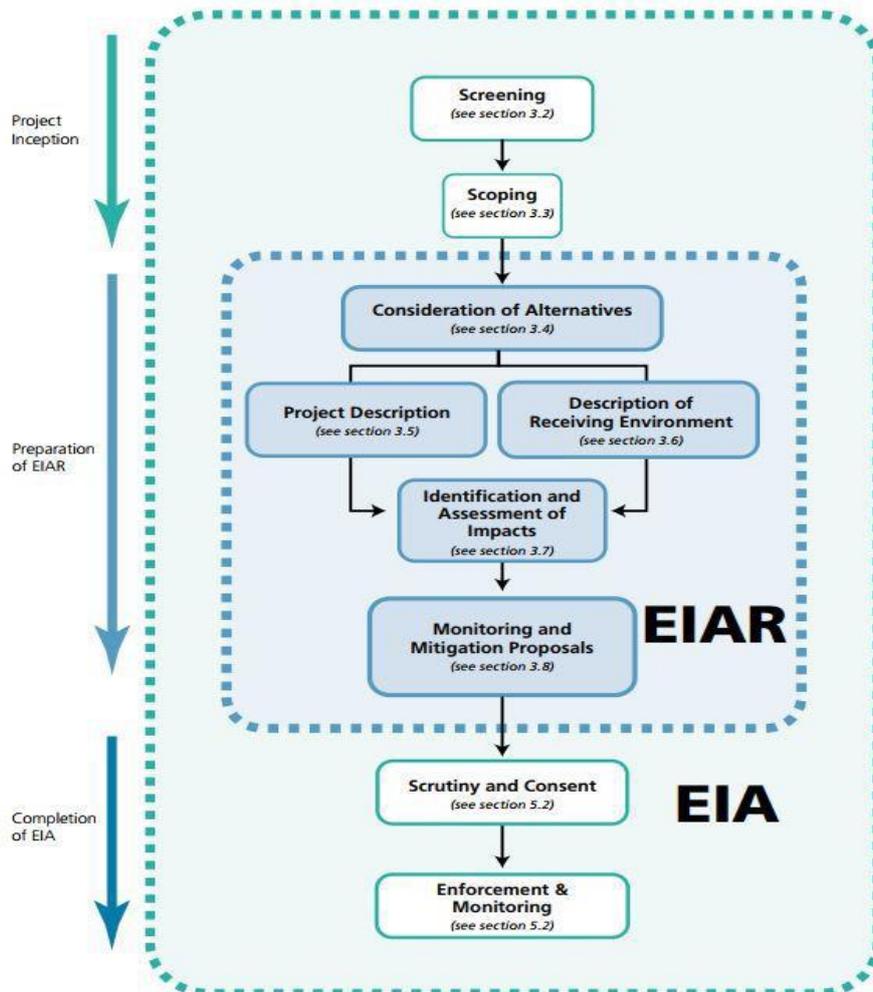


Figure 1-1: EIA Process

## 1.2 EIA Legislation

The EIA Directive requires EIA to be carried out for certain projects as listed in the Directive. The EIA Directive is transposed into Irish law through the Planning and Development Act 2000 (as amended) (the Planning Act) and the Planning Regulations 2001 (As Amended).

## 1.3 EIA Guidelines

This EIAR has been prepared in accordance with all relevant guidance. The documents listed below are common to all chapters. Additional specific guidelines will be referred to in each specific chapter.

- ❖ Advice Notes on Current Practice in the Preparation of Environmental Impact Statements (EPA 2003);
- ❖ Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA May 2022);
- ❖ Environmental Assessments of Plans, Programmes and Projects – Rulings of the Court of Justice of the European Union (European Union 2020);
- ❖ Environmental Impact Assessment of Projects – Guidance on Scoping (Directive 2011/92/EU as amended by 2014/52/EU) (European Union 2017);
- ❖ Guidance of Integrating Climate Change and Biodiversity into Environmental Impact Assessment (European Union 2013);
- ❖ Environmental Impact Assessment of Projects – Guidance on the preparation of the Environmental Impact Assessment Report (European Union 2017);
- ❖ Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Government of Ireland 2018);
- ❖ Key Issues Consultation Paper on the Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licencing Systems; (Department of Housing, Planning, Community and Local Government 2017);
- ❖ Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions (European Communities 1999); and
- ❖ Implementation of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (European Communities 2003).
- ❖ Office of the Planning Regulator (OPR) Environmental Impact Assessment Screening Practice Note (2021).

The EIA Directive defines EIA as a process. Article 1(2)(g) states that EIA means:

*“(i) the preparation of an environmental impact assessment report by the developer, as referred to in Article 5(1) and (2);*

*(ii) the carrying out of consultations as referred to in Article 6 and, where relevant, Article 7;*

*(iii) the examination by the competent authority of the information presented in the environmental impact assessment report and any supplementary information provided, where necessary, by the developer in accordance with Article 5(3), and any relevant information received through the consultations under Articles 6 and 7;*

*(iv) the reasoned conclusion by the competent authority on the significant effects of the project on the environment, taking into account the results of the examination referred to in point;*

*(iii) and, where appropriate, its own supplementary examination; and*

*(v) the integration of the competent authority's reasoned conclusion into any of the decisions referred to in Article 8a”.*

The EIA Directive requires the EIAR to identify, describe and assess, in an appropriate manner and in light of each individual case, the direct, indirect and cumulative significant effects of the Proposed Development on factors of the environment as per Schedule 6, Sections 1 and 2 of the Planning Regulations, including:

- Population and human health
- Biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC (respectively, the Habitats Directive and the Birds Directive)
- Land, soil, water, air, and climate
- Material assets, cultural heritage, and the landscape

The interaction between the factors referred to in points (a) to (d)

## **1.4 Screening for EIA**

'Screening' is the term used to describe the process for determining whether a Proposed Development requires an EIA by reference to mandatory legislative threshold requirements or in the case of sub threshold development, by reference to the type and scale of the Proposed Development and the significance of the likely effects of the Proposed Development.

Annex 1 of the EIA Directive requires as mandatory an EIA for all development projects listed therein.

Schedule 5, Part 1, of the Planning Regulations transposes Annex 1 of the EIA Directive directly into Irish planning legislation. An EIAR is required to accompany a planning application for development of a class set out in Schedule 5, Part 1 of the Planning Regulations which exceeds a limit, quantity or threshold set for that class of development. The Proposed

Development is not a development type listed under Schedule 5, Part 1, of the Planning Regulations.

Schedule 5, Part 2 of the Planning Regulations defines projects that are assessed on the basis of set mandatory thresholds for each of the project classes including;

*2. Extractive Industry*

*b) Extraction of stone, gravel, sand or clay, where the area of extraction would be greater than 5 hectares.*

*14. Works of Demolition*

*Works of demolition carried out in order to facilitate a project listed in Part 1 or Part 2 of this Schedule where such works would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.*

*15. Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.*

The area of extraction for the Proposed Development is 2.45 hectares which is less than the 5-hectare threshold and thus a mandatory EIA is not required. The Proposed Development involves demolition of existing derelict buildings to allow for the lateral quarry extension. Based on the above an EIAR has been carried out to assess any likely significant effects on the environment.

## **1.5 Scope of the EIAR**

‘Scoping’ is a process of deciding what information should be contained in an EIAR and what methods should be used to gather and assess that information. It is defined in the European Commission (EC) Guidance on EIA Scoping 2017<sup>1</sup> as:

*‘The process of identifying the content and extent of the information to be submitted to the Competent Authority under the EIA process.’*

The content of this EIAR was informed by a scoping process carried out by the Applicant, design team and EIAR consultants to identify the core issues likely to be most important during the EIA process.

The EIAR prepared for the Proposed Development has endeavoured to be as thorough as possible and therefore all the issues listed in Schedule 6, Sections 1 and 2 of the Planning Regulations and Article 3 of the EIA Directive have been addressed in the EIAR.

---

<sup>1</sup> Environmental Impact Assessment of Projects Guidance on Scoping 2017

The scope of this EIAR has had regard to the documents listed in Section 1.4 above, together with:

- 2 The requirements of Part X of the Planning Act and also Part 10 of the Planning Regulations;
- 3 Carlow County Development Plan 2022-2028;
- 4 Relevant Regional and National Planning Policy Documents (refer to Chapter 3 of this EIAR);
- 5 The receiving environment and any vulnerable or sensitive local features and current uses;
- 6 Previous relevant planning history and applications that have been submitted on the subject and adjoining lands;
- 7 Any likely significant impacts of the Proposed Development on the environment; and
- 8 Available mitigation measures for reducing or eliminating any potentially significant undesirable impacts.

In addition, the individual chapters of this EIAR should be referred to for further information on the documents consulted by each individual consultant. The EIAR complies with the requirements of the Carlow County Development Plan 2022-2028.

## 1.6 Purpose and Objectives of the EIAR

The purpose of this EIAR is to assist in the EIA process, by identifying likely significant effects resulting from the Proposed Development, to describe the means and extent by which they can be reduced or mitigated, to interpret and communicate information about the likely impacts and to provide an input into the decision making and planning process.

The fundamental principles to be followed when preparing an EIAR are:

- 9 Anticipating, avoiding, and reducing significant adverse effects;
- 10 Assessing and pursuing preventative action;
- 11 Maintaining objectivity;
- 12 Ensuring clarity and quality;
- 13 Providing relevant information to decision makers; and
- 14 Facilitating public and stakeholder consultation.

EIA is an iterative process. The EIAR captures this assessment process and describes its outcomes. The EIAR documents the consideration of environmental effects and provides transparent, objective and replicable documentary evidence of the EIA evaluation and decision-making processes.

The EIAR provides information on any identified effects arising as a consequence of the Proposed Development and which:

- Are environmentally based;
- Are likely to occur; and
- Have significant and adverse effects on the environment.

RECEIVED: 27/03/2023

### 1.7 Format and Structure of this EIAR

The formation of an EIAR necessitates the co-ordination and collation of associated, yet diverse, specialised areas of assessment. The EIA approach involves the examination of each environmental factor, describing the existing baseline environment, the Proposed Development, its likely impacts and direct and indirect significant effects pertaining to that environmental factor and mitigation measures, where appropriate.

The topics examined in this EIAR are categorised under the environmental factors prescribed under the EIA Directive and Planning Regulations:

15 Population and Human Health

16 Biodiversity

17 Land and Soils

18 Water

19 Air Quality and Climate

20 Material Assets

21 Cultural Heritage

22 Landscape

And the interaction between these factors. The expected effects deriving from the vulnerability of the Proposed Development to risks of major accidents and/or disasters must also be examined. EC Guidance requires decommissioning phase to be considered, however, this is not relevant to the Proposed Development as it is a residential development.

The structure of the EIAR is set out in Table 1-1.

*Table 1-1: Structure of the EIAR*

Chapter	Title	Content
1	Introduction and Methodology	Chapter 1 sets out the purpose, methodology and scope of the document.

Chapter	Title	Content
2	Description of the Proposed Development & Assessment of Alternatives	As required under Article 5(1)(a) of the EIA Directive 2014/52/EU (subsequently referred to as the Directive), Chapter 2 provides a description of the Site, design and scale of Proposed Development, and as required under Article 5(d), an evaluation of the reasonable alternatives.
3	Planning and Development Context	Chapter 3 sets the national, regional, and local policy framework for the Proposed Development.
4	Population and Human Health	Chapter 4 covers the requirement for assessment on potentially significant effects to population and human health as required under Article 3(1)(a) of the Directive.
5	Biodiversity	Chapter 5 covers the requirement of Article 3(1)(b) of the Directive to assess potentially significant effects on biodiversity (which previously referred only to 'fauna and flora'), having particular attention to species and habitats protected under the Habitats Directive and the Birds Directive.
6	Land and Soils	Chapter 6 covers the requirement under Article 3(1)(c) of the Directive on Land and Soil to assess the type of soil and geology in the area of the Proposed Development and identifies any potentially significant effects.
7	Hydrology	Chapter 7 covers the requirement under Article 3(1)(c) of the Directive to assess potentially significant effects to water quality arising from the Proposed Development. This Chapter will assess any potential effects from pollution and discharges to surface water and will detail compliance with the Water Framework Directive.
8	Air Quality and Climate	Chapter 8 covers the requirement under Article 3(1)(c) of the Directive on Air and Climate to assess potentially significant effects to air quality in the surrounding environment.
9	Noise and Vibration	Chapter 9 covers the requirement to assess potentially significant effects from airborne noise and vibration as required under Article 3(1) of the Directive.
10	Landscape and Visual Amenity	Chapter 10 covers the requirement under Article 3(1)(d) of the Directive to assess potentially significant effects on the landscape. This Chapter will assess any potential visual impacts to landscape caused by the Proposed Development.
11	Archaeology and Cultural Heritage.	Chapter 11 covers the requirement under Article 3(1)(d) of the Directive to assess potentially significant effects on archaeology and cultural heritage.

Chapter	Title	Content
12	Material Assets _Traffic, Utilities and Waste Management	Chapter 12 covers the requirement under Article 3(1)(d) of the Directive to assess potentially significant effects on material assets. This Chapter will identify impacts to existing utilities and infrastructure from the development of the Proposed Development.  Article 5(1), Annex IV, point 1(d) of the Directive requires estimates of quantities and types of waste produced during construction and operation phase. Chapter 12 will also present an assessment of how resources and waste will be managed for the Proposed Development.
13	Risk Management	Chapter 13 covers the requirement under Article 3(2) of the Directive to include the expected effects deriving from the vulnerability of the Proposed Development to risks of major accidents and/or disasters that are relevant to the project.
14	Interactions	As required under Article 3(1)(e) of the Directive, Chapter 14 provides an assessment of the interaction between all of the environmental aspects referred to in this EIAR.
15	Mitigation and Monitoring	Chapter 15 describes mitigation and monitoring as required under Article 5(1) of the Directive in order to avoid, prevent, reduce, or if possible, offset any identified significant adverse effects on the environment and, where appropriate, describes any proposed monitoring arrangements.

This approach employs standard descriptive methods, replicable prediction techniques and standardised impact descriptions to provide an appropriate evaluation of each environmental topic under consideration.

### 1.8 Methodology Used to Produce this EIAR

The methodology employed to produce this EIAR is detailed in Table 1-2. The objective is to evaluate each environmental topic, both individually and collectively, in a systematic and objective manner.

The methodology will outline the methods used to describe the baseline environmental conditions as well as predict the likely impacts on the environment of the Proposed Development. The data and survey requirements for each chapter will vary depending on the environmental topic and have been chosen by the particular specialist based on relevant legislation, best practice guidance, policy requirements, and professional judgement. Similarly, the study area is also defined for each environmental topic based on professional judgement and experience.

All environmental topics require desktop reviews of all relevant data at a minimum. These desktop studies are then supplemented by field studies and consultations with relevant stakeholders, for example interested parties, statutory bodies and local authorities, as required for each environmental topic.

An outline of the methodology employed consistently in each chapter of the EIAR to examine each environmental topic is provided in Table 1-2:

Table 1-2: Methodology Employed to Produce each EIAR Chapter

Chapter	Methodology
Introduction	Provides an overview of the specialist area and specifies the specialist who prepared the assessment and their qualifications and competencies.
Study Methodology	This subsection outlines the method by which the relevant impact assessment has been conducted within that chapter. In each respective chapter the zone of influence of the Project is outlined in respect of each environmental receptor and explain and justify the methodology used to determine an appropriate study area.
The Existing Receiving Environment (Baseline Situation)	The context, character, significance, and sensitivity of the baseline receiving environment, into which the Proposed Development will fit, is assessed. This also takes account of any Proposed Developments for which applications for consent have been submitted and have been developed.
Characteristics of the Proposed Development	<p>Consideration of the 'Characteristics of the Proposed Development' allows for a projection of the 'level of impact' on any particular aspect of the environment that could arise. For each chapter those characteristics of the Proposed Development which are relevant to the area of study are described; for example, the chapter on noise describes the machinery and operations which are likely to produce noise while the landscape and visual impact would describe the height, scale and location of the development.</p> <p>The characteristics of projects must be considered, with particular regard to: (a) the size and design of the whole project; (b) cumulation with other existing and/or approved projects; (c) the use of natural resources, in particular land, soil, water and biodiversity; (d) the production of waste; (e) pollution and nuisances; (f) Material assets including road network capacity and utilities (g) the risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge; (h) the risks to human health (for example due to water contamination or air pollution)</p>
Potential Impact of the Proposed Development	This section provides a description of the specific, direct and indirect, impacts that the Proposed Development may have. This is provided with reference to both the Receiving Environment and Characteristics of the Proposed Development sections while also referring to the (i) magnitude and intensity, (ii) integrity, (iii) duration and (iv) probability of impacts. Impact assessment addresses direct, indirect, secondary, cumulative, short, medium and long-term permanent, temporary, positive and negative effects as well as impact interactions. This EIAR has considered it important to subdivide sections into 'Construction Phase' and 'Operational Phase' in describing impacts, mitigation measures.
Cumulative Impacts	A review has been carried out by each consultant in regard to the potential for cumulative impacts with permitted and Proposed Developments in the vicinity. The Carlow County Council planning website was reviewed to identify permissions in the area.
Do Nothing Impact	In order to provide a qualitative and equitable assessment of the Proposed Development, this section considers the Proposed Development in the context of the likely impacts upon the receiving environment should the Proposed Development not take place.
Avoidance, Remedial and Mitigation Measures	Avoidance, Remedial and Mitigation measures describe any corrective or mitigative measures that are either practicable or reasonable, having regard to the potential impacts. This includes avoidance, reduction and remedy measures as set out in

Chapter	Methodology
	Section 4.7 of the Development Management Guidelines 2007 to reduce or eliminate any significant adverse impacts identified.
Predicted Impacts of the Proposed Development	This section allows for a qualitative description of the resultant specific direct, indirect, secondary, cumulative, short, medium and long-term permanent, temporary, positive and negative effects as well as impact interactions which the Proposed Development may have, assuming all mitigation measures are fully and successfully applied.
Monitoring	This involves a description of monitoring in a post-development phase, if required. This section addresses the effects that require monitoring, along with the methods and the agencies that are responsible for such monitoring.
Interactions	This section provides a description of impact interactions together with potential indirect, secondary and cumulative impacts
Difficulties Encountered in Compiling Information	This section provides an indication of any difficulties encountered by the environmental specialist in compiling the required information.
References	Consultants refer to documents referred to in preparing their chapter / undertaking their assessment.

## 1.9 EIAR Project Team

Each environmental specialist was commissioned having regard to their previous experience in EIA; their knowledge of relevant environmental legislation relevant to their topic; familiarity with the relevant standards and criteria for evaluation relevant to their topic; ability to interpret the specialised documentation of the construction sector and to understand and anticipate how their topic will be affected during the Construction Phase and the Operation Phase of development; ability to arrive at practicable and reliable measure to mitigate or avoid adverse environmental impacts; and to clearly and comprehensively present their findings.

Chapter	Consultant Name and address	Specialist Area
<b>1.0 Introduction and Methodology</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN  Louise Hewitt	Multidisciplinary Environmental Consultants
<b>2.0 Project Description and Alternatives</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN  Mairead Foran	Multidisciplinary Environmental Consultants
<b>3.0 Planning &amp; Policy Context</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN  Claire Fagan	Multidisciplinary Environmental Consultants

Chapter	Consultant Name and address	Specialist Area
<b>4.0 Population and Human Health</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN  Louise Hewitt	Multidisciplinary Environmental Consultants
<b>5.0 Biodiversity</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN  Emma Josephine Devereux	Multidisciplinary Environmental Consultants
<b>6.0 Land &amp; Soils</b>	Hydro-Environmental Services (HES) 22 Lower Main Street, Dungarvan, Co. Waterford. X35 HK11  Michael Gill and Conor McGettigan	Multidisciplinary Environmental Consultants
<b>7.0 Hydrogeology and Hydrology</b>	Hydro-Environmental Services (HES) 22 Lower Main Street, Dungarvan, Co. Waterford. X35 HK11  Michael Gill and Conor McGettigan	Multidisciplinary Environmental Consultants
<b>8.1 Air Quality &amp; Climate</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN  Laura Griffin	Multidisciplinary Environmental Consultants
<b>9.0 Noise and Vibration</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN  Laura Griffin	Multidisciplinary Environmental Consultants
<b>10.0 Landscape and Visual Impact</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN  Nuno Costa	Multidisciplinary Environmental Consultants
<b>11.0 Archaeology &amp; Cultural Heritage</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN  Arthur Greene	Multidisciplinary Environmental Consultants
<b>12.1 Material Assets – Traffic</b>	Transport Insights, Suite 30, 21 Baggot Street Lower, Dublin 2, D02 X658  Eoin Munn and Garret Murphy	Transport Consultancy Ireland
<b>12.2 Material Assets – Waste &amp; Utilities</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN  Mairead Foran	Multidisciplinary Environmental Consultants
<b>13.0 Risk Management</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN  Louise Hewitt	Multidisciplinary Environmental Consultants

Chapter	Consultant Name and address	Specialist Area
<b>14.0 Interactions</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Arthur Greene	Multidisciplinary Environmental Consultants
<b>15.0 Mitigation and Monitoring</b>	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Arthur Greene	Multidisciplinary Environmental Consultants

## 1.10 Non-Technical Summary

A Non-Technical Summary of the EIAR has also been prepared. The EIA Directive states that one of the objectives of the EIA process is to ensure that the public are fully aware of the environmental implications of any decisions. Environmental Protection Agency (EPA) Guidelines note that the non-technical summary of the EIAR should facilitate the dissemination of the information contained in the EIAR and that the core objective is to ensure that the public is made as fully aware as possible of the likely significant effects of projects prior to a decision being made by Carlow County Council. A Non-Technical Summary of the EIAR has therefore been prepared which summarises the key environmental impacts and is provided as a separately bound document.

## 1.11 Links between EIAR and Appropriate Assessment

A Screening Report for Appropriate Assessment (AA) has been carried out for the Proposed Development to determine if there is a risk of effects to any European site. The conclusion of this report states “the possibility may not be excluded that the Proposed Development will have a likely significant effect on the River Barrow and River Nore SAC (002162) European Site. Accordingly, a Natura Impact Statement (NIS) has been prepared for the Proposed Development. Where potentially significant impacts were identified, a range of mitigation and avoidance measures have been suggested to offset them. It was concluded, beyond reasonable scientific doubt, that the Proposed Development will have no adverse effects on the Qualifying Interests, Special Conservation Interests and on the integrity and extent of River Barrow and River Barrow and River Nore SAC. Accordingly, the Proposed Development will not adversely affect the integrity of any relevant European site.

## 1.12 Availability of EIAR Documents.

A copy of this EIAR document and Non-Technical Summary is available for purchase at the offices of Carlow County Council at a fee not exceeding the reasonable cost of reproducing the document.

### **1.13 Statement of Difficulties Encountered**

No exceptional difficulties were experienced in compiling the necessary information for the EIAR for the Proposed Development. Where any specific difficulties were encountered these are outlined in the relevant chapter of the EIAR.

### **1.14 Quotations**

It is important to acknowledge that the EIAR by its nature contains statements about the Proposed Development, some of which are positive and some less than positive. Selective quotation or quotations out of context can give a very misleading impression of the findings of the study. Therefore, the study team urge that quotations should, where reasonably possible, be taken from the conclusions of specialists' sections or from the Non-Technical Summary and not selective.

RECEIVED: 27/03/2023