

APPENDIX 2-2 Scoping Responses Compiled

| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:00 |
| То: | planning@antaisce.org |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | An Taisce.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin <u>mkoireland.ie</u> | +353 (0)91 735 611



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| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:00 |
| То: | tinaa@batconservationireland.org |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Bat Conservation Ireland.pdf |

Dear Ms Aughney,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

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| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:01 |
| То: | info@birdwatchireland.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Birdwatch Ireland.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

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| From: | Malena Sara Thren |
|--------------|--|
| Sent: | Friday 19 January 2024 17:02 |
| То: | planning@CRU.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Commission for Regulation of Utilities, Water and Energy.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

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| From: | Environmental Co-ordination (Inbox) |
|--------------|---|
| Sent: | Wednesday 28 February 2024 12:49 |
| То: | Malena Sara Thren |
| Subject: | FW: 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Department of Agriculture, Food and the Marine.pdf; Meenbog |
| | Wind Farm Co Donegal.pdf |

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Good afternoon,

Please see observations attached from our Felling Division.

Regards,

Environmental Co-ordination Unit

From: Malena Sara Thren <<u>msthren@mkoireland.ie</u>>
Sent: Friday, January 19, 2024 5:04 PM
To: Environmental Co-ordination (Inbox) <<u>Environmental_Co-ordination@agriculture.gov.ie</u>>
Cc: Thomas Blackwell <<u>tblackwell@mkoireland.ie</u>>
Subject: 220623 Scoping Letter Alterations to Meenbog Windfarm

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Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

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Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid. D'fhéadfadh an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphoist seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scrios gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.

MKO Tuam Road Galway H91 VW84

28th February 2024

Re: <u>Scoping Request for the proposed Alterations to Meenbog Wind Farm near Meenbog and</u> <u>Croaghonagh, Co. Donegal.</u>

Dear Sir/Madam,

The following are the comments from this Division in relation to the proposed development:

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department <u>before</u> trees are felled or removed. A Felling Licence application form can be obtained from **Felling Section**, **Department of Agriculture**, **Food and the Marine**, **Johnstown Castle Estate**, **Co. Wexford**. Email: <u>felling.forestservice@agriculture.gov.ie</u> or Web <u>gov.ie - Tree Felling</u> <u>Licences (www.gov.ie)</u>

A Felling Licence granted by the Minister for Agriculture, Food and the Marine provides authority under the Forestry Act 2014 to fell or otherwise remove a tree or trees and/or to thin a forest for silvicultural reasons. The Act prescribes the functions of the Minister and details the requirements, rights and obligations in relation to felling licences. The principal set of regulations giving further effect to the Forestry Act 2014 are the Forestry Regulations 2017 (S.I. No. 191 of 2017).

The developer should take note of the contents of **Felling and Reforestation Policy** document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; <u>gov.ie - Tree Felling Licences (www.gov.ie)</u> As this development is within forest lands, particular attention should be paid to deforestation, turbulence felling and the requirement to afforest alternative lands.

In order to ensure regulated forestry operations in Ireland accord with the principles of sustainable forest management (SFM), as well fulfilling the requirements of other relevant environmental protection laws, the Department (acting through its Forest Service division) must undertake particular consultations, and give certain matters full consideration during the assessment of individual Felling Licence applications. This includes consultation with relevant bodies, the application of various protocols and procedures (e.g. Forest Service Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement).

Consequently, when the Forest Service is considering an application to fell trees, the following applies:

- The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);
- 2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices are published online at: gov.ie Felling Licence Applications (www.gov.ie)

3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 14 days to the Forestry Appeals Committee. Felling Licence decision are published online at: gov.ie - Felling Licence Decisions (www.gov.ie)

It is important to note that when applying to a Local Authority, or An Bord Pleanàla, for planning permission where developments are:

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
- b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
- c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,
 - 1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project;

and

- 2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord Pleanàla, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.
- 3. Please note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s)

Yours sincerely,

Catherine Boyce Felling Section Department of Agriculture, Food and the Marine Johnstown Castle Co Wexford

| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:03 |
| То: | daeradirect.strabane@daera-ni.gov.uk |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | DAERA Direct Regional Office.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

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| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:05 |
| То: | propertymanagementplanning@defence.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Department of Defence.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

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| From: | Malena Sara Thren |
|--------------|--|
| Sent: | Friday 19 January 2024 17:06 |
| То: | Housing Manager DAU |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Department of Housing, Local Government and Heritage.pdf |

Dear Mr Hillis,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

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| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:07 |
| То: | planningnotifications@decc.gov.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Department of the Environment, Climate and Communications.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

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| From: | Malena Sara Thren |
|--------------|--|
| Sent: | Friday 19 January 2024 17:07 |
| То: | airestait@tcagsm.gov.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

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McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

| From: Sent: | Transport GCU <generalco-ordinationunit@transport.gov.ie> Wednesday 24 January 2024 15:14</generalco-ordinationunit@transport.gov.ie> |
|----------------|---|
| То: | Malena Sara Thren; Transport GCU |
| Cc: | Thomas Blackwell |
| Subject: | RE: 220623 Scoping Letter Alterations to Meenbog Windfarm |

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Good afternoon,

Thank you for contacting the Department of Transport regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

Please be advised that the Department has no further observations to make at this point in time.

It would be appreciated if you could keep us updated of any future development in relation to this project.

Kind regards Jacqui

Jacqui Traynor Central Policy, Coordination and Reform An Roinn Iompair Department of Transport Lána Líosain, Baile Átha Cliath, D02 TR60 Leeson Lane, Dublin, D02 TR60 T +353 (0)1 604 1177 gcu@transport.gov.ie www.gov.ie/transport

From: Malena Sara Thren <msthren@mkoireland.ie>
Sent: Friday 19 January 2024 17:08
To: Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>
Cc: Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 220623 Scoping Letter Alterations to Meenbog Windfarm

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Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Malena Sara Thren Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin mkoireland.ie | +353 (0)91 735 611



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| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:10 |
| То: | statutorynotifications@eirgrid.com |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | EirGrid.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

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| From:JOE FERRY (LAB) < JOE.FERRY@donegalcoco.ie>Sent:Thursday 25 January 2024 09:35To:Thomas BlackwellCc:MICHAEL McGARVEY; SEAMUS HOPKINS; Malena SaraSubject:RE: 220623 Scoping Letter Alterations to Meenbog Window | |
|---|--|
|---|--|

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Thomas,

You may recall that we met at Meenbog during the immediate aftermath of the peat slide and during the remedial works subsequently. Bryan Cannon, Senior Engineer, was actively involved also but he has since moved to the Roads Directorate as Director and has been replaced by Seamus Hopkins (cc'd) as Senior Engineer. Any future correspondence for the Water & Environment directorate should be sent to us. I have read through your letter, which I note has been copied to various other sections of Donegal County Council, including Planning, and I am satisfied with the approach taken.

I visited the site on the 31st August last year, with colleagues Patrick Gallagher from Environment and Martin McDermott from Planning, in the company of Chris O'Mahoney, and we were satisfied with the outcome of the remedial and restoration works completed. I think the main scar area will require a bit more time to fully establish complete vegetative cover, ie native grasses & heather, along with the deciduous trees planted already, which should afford good protection in time to the Sruhangarve stream down gradient of the area. There was no evidence during that visit of any sediment loss from that area or ingress to the stream. The other areas downstream of the site and immediately upstream of the confluence with the Mournebeg river have recovered exceptionally well, at least from a visual perspective. I think overall both MKO and Planree have managed the aftermath of this unfortunate incident in a very professional manner and appear to have achieved the best possible environmental outcomes in the circumstances.

Kind regards

Joe Ferry, (Dr), A/Senior Executive Scientist Donegal Co. Council Public Services Centre Letterkenny Co. Donegal F92TNY3 074-9153900

From: SUZANNE BOGAN (TINNEY) LAB LETTERKENNY <SBOGAN@DONEGALCOCO.IE>
Sent: 24 January 2024 16:18
To: SEAMUS HOPKINS <SHOPKINS@Donegalcoco.ie>; JOE FERRY (LAB) <JOE.FERRY@donegalcoco.ie>
Cc: MICHAEL McGARVEY <mmcgarvey@donegalcoco.ie>
Subject: FW: 220623 Scoping Letter Alterations to Meenbog Windfarm

Hi all,

Please see attached and below email I received regarding Meenbog Windfarm.

Suzanne

From: Malena Sara Thren <<u>msthren@mkoireland.ie</u>>
Sent: 19 January 2024 17:11
To: SUZANNE BOGAN (TINNEY) LAB LETTERKENNY <<u>SBOGAN@DONEGALCOCO.IE</u>>; DCCINFO
<<u>info@Donegalcoco.ie</u>>
Cc: Thomas Blackwell <<u>tblackwell@mkoireland.ie</u>>
Subject: 220623 Scoping Letter Alterations to Meenbog Windfarm

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Dear Sir or Madam,

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Kind regards, Malena

marcha

Malena Sara Thren

Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

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| From: | planning applications <planning.applications@failteireland.ie></planning.applications@failteireland.ie> |
|--------------|---|
| Sent: | Wednesday 7 February 2024 14:55 |
| To: | Malena Sara Thren |
| Cc: | Thomas Blackwell |
| Subject: | RE: 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Fáilte Ireland EIAR Guidelines 2023.pdf |

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Hello Malena,

Thank you for your email and scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

Please see attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed project. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Regards,

Yvonne

Yvonne Jackson Product Development-Environment & Planning Support | Fáilte Ireland

88-95 Amiens Street, Dublin 1, D01 WR86 M +353 (0)86 0357590



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From: Malena Sara Thren <msthren@mkoireland.ie>
Sent: Friday, January 19, 2024 5:12 PM
To: planning applications <planning.applications@failteireland.ie>

Cc: Thomas Blackwell <tblackwell@mkoireland.ie> **Subject:** 220623 Scoping Letter Alterations to Meenbog Windfarm

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Dear Ms Jackson,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

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Malena Sara Thren Graduate Environmental Scientist

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EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects



July 2023

An tÚdarás Náisiúnta Forbartha Turasóireachta Áras Fáilte, 88–95 Sráid Amiens Baile Átha Cliath 1 D01 WR86 Éire

National Tourism Development Authority Áras Fáilte, 88 - 95 Amiens Street Dublin 1 D01WR86 Ireland

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1. Introduction

Tourism is a growing sector and substantial part of the Irish Economy. It contributes to both urban and rural economies in every part of the country. The impact and interaction of tourism with the environment is complex and the assessment of environmental impacts is of utmost importance to creating a sustainable tourism economy and protecting the natural resources that are so often a tourism attraction.

The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

This guidance document has been prepared by Fáilte Ireland to update their EIA guidelines in line with changes in legislative and guidance requirements.

2. Background to this Document

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately **260,000 people**, an economic contribution of **€9.5 billion**, and exchequer revenue of **€1.8 billion** in 2019, which helps fund other key public services.

In 2019 Ireland welcomed 9.7 million overseas visitors.

Fáilte Ireland is the National Tourism Development Authority established by the Irish Government in May 2003. Fáilte Irelands role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. They provide a range of practical business supports to help tourism businesses better manage and market their products and services.

Fáilte Ireland also work with other state agencies and representative bodies, at local and national levels, to implement and champion positive and practical strategies that will benefit Irish tourism and the Irish economy.

Fáilte Ireland promotes Ireland as a holiday destination through a domestic marketing campaign (DiscoverIreland.ie) and manage a network of nationwide tourist information centres that provide help and advice for visitors to Ireland.

Tourism related projects cover a broad range of plans, programmes and developments, from the Wild Atlantic Way to a single hotel conversion. These guidelines apply to projects involving or impacting upon tourism. A tourism plan, strategy or programme where it is part of the statutory plan making process under the Planning and Development Acts (as amended), may be more appropriately assessed by a Strategic Environmental Assessment (SEA) as discussed in the next section.

It should be borne in mind that EIA is required where there is anticipated to be a significant impact on the environment, where tourism projects are of a prescribed type or meet thresholds identified below.

Where Natura 2000 Designated Sites are potentially affected by tourism development Appropriate Assessment must be carried out by the appropriate authority in accordance with Article 6(3) of the EU Habitats Directive.

3. Legislation and Statutory Guidance

Environmental Impact Assessment is a procedure that ensures that the environmental implications of decisions are taken into account before planning based decisions are made. The assessment results in a report, called an Environmental Impact Assessment Report (EIAR).

Legislation

These guidelines are produced under current EIAR legislative requirements, having regard to Directive 2011/92/EU (known as 'Environmental Impact Assessment' – EIA Directive), as amended by Directive EU 2014/52 which came into effect in May of 2017. These requirements were transposed into Irish Law on 1 September 2018 as most of the provisions of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) came into effect. The principle of both Directives is to ensure that plans, programmes and projects likely to have significant effects on the environment are made subject to an environmental assessment, prior to their approval or authorisation.

Statutory Guidance

In response to the changes to the EIAR requirements under Directive EU 2014/52, the Environmental Protection Agency (EPA) developed Guidelines on the information to be contained in Environmental Impact Assessment Reports in May 2022. The Guidelines are a statutory document to be regarded by those preparing EIARs and the decision makers considering the EIARs.

Some of the key changes to the EIA Directive introduced by Directive 2014/52/EU are as follows:

- Additional information to be provided in the project description to describe the location of the project, the technologies and substances used, the construction of the project and required demolition;
- The requirement for consideration of alternatives has changed from a requirement to
 provide 'An outline of the main alternatives studied by the developer and an indication
 of the main reasons for this choice, taking into account the environmental effects' to 'a
 description of the reasonable alternatives studied by the developer, which are relevant
 to the project and its specific characteristics, and an indication of the main reasons for
 the option chosen, taking into account the effects of the project on the environment';
- A refinement of the environmental factors to be considered in the assessment with an increased focus on resource efficiency, climate change, biodiversity and disaster prevention;
- Changes to Prescribed Environmental Factors with 'Land' being added, 'Human Beings' replaced by 'Population & Human Health' and 'Flora & Fauna' replaced by 'Biodiversity';

- The developer is required to have competent experts to prepare the EIAR and the Board is required to have access to sufficient expertise to assess the EIAR;
- Requirement for the incorporation of mitigation and monitoring measures in consents and ensuring that developers deliver these measures;
- The requirements for the assessment of cumulative effects with existing and/or approved projects, taking into account existing environmental issues to be considered; and
- Reasoned decisions made with regard to the EIA outcomes must be provided.

In addition to the EPA statutory guidance, the Department of Housing has produced Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment in August 2018.

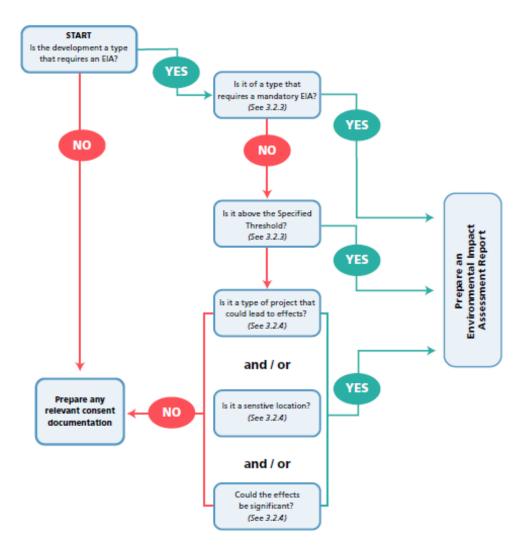
The process of EIA is set out in the EPA EIAR Guidelines, this document should be read in conjunction with and used as supplementary guidance to the EPA EIAR Guidelines. The process for ascertaining whether an EIAR is required is known as 'screening' and the process to determine the breath and scope of an EIAR is known as 'scoping'. Guidance on this can be found in Section 3.2 of the EPA Guidelines.

Screening

Through EIA Screening, developments are either considered as requiring an EIAR due to the project type or because they exceed a threshold level. The screening process begins by establishing whether the proposal is a 'project' as understood by the Directive (as amended).

The prescribed development types and thresholds are set out in Annex I and II of the EIA Directive as transposed into Schedule 5 of the Planning and Development Regulations 2010-2018 (as amended). Development which does not exceed these thresholds but may require an EIAR are called sub threshold. Sub-Threshold considerations are outlined in Schedule 7 of European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) as transposed from Annex III of the Directive. The Guidelines on Environmental Impact Assessment Reports note that projects at first glance may not appear to come under the Schedule but on closer examination when the process is further examined, they may do so because of the sensitivity or significance of the receiving environmental impacts and must undergo assessment for likely significant impacts through an EIAR screening report. The contents of a screening report for subthreshold development are contained in Annex III of the EIA Directive.





(Taken from Fig 3.2 of the EPA Guidelines)

Tourism locations should be identified as sensitive receptors in screening assessments for particular impacts, depending on scale and sensitivity, as they would in a full EIAR. Section 6 below can act as guidance for Screening Reports as well as for full EIAR.

The screening process for considering where an EIAR is necessary, is summarised above in Figure 1 (excerpted from Figure 3.2 of the EPA Guidelines).

Strategic Environmental Assessment (SEA) is a more strategic level of environmental assessment that examines plans, policies, objectives and programmes specifically rather than projects. For some tourism developments it may be more appropriate that they be examined through SEA, while individual projects or specific proposals are likely to be more assessed through EIAR. If a project is part of a plan, programme or policy/objective assessed by SEA there may still be a requirement for an EIAR for that development (subject to EIA Screening assessment).

EIAR Scoping

Scoping an EIAR is an opportunity to look at the breadth of issues and ensure that any areas of possible significant impact are assessed. Identifying sensitivities and stakeholders should take account of tourism facilities and consider Fáilte Ireland in scoping requests where necessary.

4. Assessing Tourism

There is no legal definition of 'tourism' in Irish legislation. The UNWTO definition of sustainable tourism is *"Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities"*. This is widely accepted as a key definition of tourism as we move to a more sustainable future.

Tourism assessments are frequently carried out by economic consultants and by specific tourism consultants. It is always advisable, particular for tourism projects, that suitably qualified and experienced personnel are used to determine the impact of tourism related projects or to assess the impact of more general proposals on a tourism asset identified in a particular location. There is a requirement for EIAR under current legislation to contain a statement of competency within all EIAR documents, including screening and scoping reports.

Projects which involve a tourism element

Tourism projects are wide ranging and diverse. While there are some projects which cater to tourism and are easily identified as such - Hotels, Museums, etc. there are other projects where tourism is a key service or element, but which may not be immediately obvious – walking/cycling/forest trails, greenways, blueways, community facilities and others. EIAR conducted for developments containing tourist elements should be completed in accordance with the current guidance from the EPA.

Projects which include a tourism element can have potential for particular environmental effects which differ from a non-tourism development. These impacts can be intermittent, event related, inconsistent, dependent on weather, temporal, temporary or seasonal. This is considered within the prescribed environmental topics for EIAR outlined in Section 7 below.

Projects which may have an impact upon tourism

While tourism projects may be diverse, the projects which can impact tourism are considerably more wide ranging, from large infrastructural developments to local energy developments. Disruption to or suppression of a tourist resource or amenity can have very local or more strategic impacts, directly or indirectly- for example energy projects in a rural area can have both a negative and positive impact in different regards. There can be temporary, periodic or even seasonal impacts occurring during construction or operational periods.

According to the Fáilte Ireland Tourism Facts 2019 Report, the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are;

- Beautiful Scenery and Unspoiled Environment
- Hospitality
- Safety
- Nature, Wildlife and Natural Attractions
- History and Culture

• Pace of Life

These factors used for the promotion of tourism in Ireland are also barometers of sensitivity to change in tourism sensitive or dominant locations where development may have an impact upon the tourism asset. The potential for development to impact these sensitivities, and the environmental criteria under which they can be considered, are identified in section 7 of the guidelines.

5. Guiding Principles of EIAR

As outlined in the EPA EIAR Guidelines, the fundamental principles to be followed when preparing an EIAR, including screening and scoping, are:

- Anticipating, avoiding and reducing significant effects
- Assessing and mitigating effects
- Maintaining objectivity
- Ensuring clarity and quality
- Providing relevant information to decision makers
- Facilitating better consultation.

Environmental assessment should be undertaken in accordance with the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

6. Consideration of Competency and Qualifications

As per Section 2.5 of the EPA Guidelines, EIAR is required to be completed by '*competent experts*'.

Contributors to the preparation of environmental impact assessment reports, including screening and scoping assessments, should be qualified and competent. Sufficient expertise, in the relevant field of the project concerned, is required for the purpose of its examination by the competent authorities in order to ensure that the information provided by the developer is complete and of a high level of quality so that a full and proper assessment can be undertaken.

For tourism related projects, or projects likely to affect tourism assets, competent experts in the area of tourism should be utilised in the environmental assessment.

The competency of all involved in the production of an EIAR or any related report (e.g. Screening and scoping) is required to be stated at the beginning of the EIAR report with further details as necessary in each following chapter.

Where tourism projects involve for example heritage or cultural components, input from heritage consultants, conservation architects, or historians may be required.

7. EIAR Requirements

The following are the key requirements for an EIAR under the current guidance. This is not a definitive list and should be read in conjunction with regulations.

- project description;
- assessment of alternatives considered;
- baseline assessment;
- assessment of effects;
- cumulative impact;
- interaction of impacts;
- mitigation & monitoring; and
- residual impacts

Project Description

Project descriptions are required to describe the whole project including site, scale, design and key factors. It is important that the EIAR and design team have a consistent understanding of the development description in full. The key requirements are outlined in section 3.5 of the EPA Guidelines however they identify the following;

- the location of the project
- the physical characteristics of the whole project
- the main characteristics of the operational phase of the project
- an estimate, by type and quantity, of the expected residues and emissions

The location of the project should include identifying key sensitive receptors (including tourism receptors). In the operational phase of the project any tourism based, or potentially tourism related activity, should be identified.

Assessment of Alternatives

The assessment of the various reasonable alternatives is an important requirement of the EIA process.

Where tourism projects are location dependent the assessment of reasonable alternatives should consider alternative methods, layouts, technologies and mitigations, detail the key considerations culminating in the selection of the option/design, the reasoning for these and the environmental effect of these decisions. This is particularly important for tourism projects which are often location tied. The EPA EIAR Guidelines indicate that it is generally sufficient to provide a broad description of each main alternatives and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option.

Baseline Assessment

Baseline descriptions are evidence based, current descriptions of environmental characteristics with consideration of likely changes to the baseline environment evidenced in planning histories, unimplemented permissions, and applications pending determination. Baseline assessments should identify any tourism sensitivities in the zone of influence of a development. This zone of influence of a development is highly dependent on its **Context**, **Character, Significance**, and **Sensitivity**, as outlined in the EPA EIAR Guidelines. These characteristics apply to both the development and the environment.

For example, in a tourism context;

The location of sensitive tourism resources that are likely to be directly affected should be highlighted, and other premises which although located elsewhere, may be the subject of in combination impacts such as alteration of traffic flows or increased urban development.

The character of an area from a tourism perspective should be described and the principal types of tourism in the area. Where relevant, the specific environmental resources or attributes in the existing environment which each group uses or values should be stated and where relevant, indicate the time, duration or seasonality of any of those activities.

The significance of the tourism assets or activities likely to be affected should be highlighted. Reference to any existing formal or published designation or recognition of such significance should be included. Where possible the value of the contribution of such tourism assets and activities to the local economy should also be provided.

If there are any significant concerns or opposition to the development known to exist among tourism stakeholders and interest groups, this should be highlighted. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened or impacted.

In addition, the baseline should include any methodologies employed in the study to obtain information, if particular databases are used to locate sensitive receptors they should be acknowledged. In relation to tourism information, the suggested information sources at the end of this document are a non-exhaustive list which may be of assistance in identifying tourism receptors.

Impact Assessment

The topics for consideration of impact are prescribed in the EIA Directive and transcribed into Irish law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Impact assessment should contain the likely significant effects of a development arising from both construction and operation of a development. Advice on describing the effects is contained within the EPA EIAR Guidelines and includes the **quality, significance, extent, probability, type** and **duration** of the effect, with particular descriptors for each. In describing effects upon tourism receptors these descriptors should take account of the particular aspects and sensitivities of tourism, for example a temporary annual effect from a development may have different impacts upon tourism if it falls at peak season rather than off-peak.

Impact assessment should be carried out as per EPA guidelines and the best practice for that prescribed topic. It may be considered appropriate to consider impact on tourism under the 'Population and Human Health' and / or 'Landscape' topics as suggested below.

Population and Human Health

The consideration of tourism projects within the Population and Human Health is extensive, with impacts ranging from rural employment population impacts of seasonal tourism, to the health impact of air pollution from increased traffic in urban areas.

The impact upon tourism can be considered within this section through the sensitivities of Hospitality, Safety and Pace of Life. Changes in population can impact the perception of pace of life or safety in a particular location. Impacts upon these issues in areas which rely heavily on tourism or have a particular sensitive tourism generator should be considered in this section. The EPA guidelines makes reference to amenity "...which may be relevant under 'Population and Human Health' and 'Landscape'".

Biodiversity

Particular tourist activities can have a significant impact upon biodiversity. Landscapes which are 'unspoiled' can be attractors of tourism. However, the disturbance to ecology must be managed to minimise impacts.

Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

The assessment should also consider current Government policy on nature conservation as outlined in the National Biodiversity Action Plan 2017-2021 (NBAP) (and subsequent iterations (Including draft NBAP recently open for public consultation, to cover 2023 to 2027) which also includes Ireland's vision for biodiversity below.

'That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.'

Land, Soils and Geology

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however particular activities or facilities which use geological features may have an impact upon soils and geology, such as mountain biking trails, recreational uses of old quarries etc.

The impact upon Geotourism related to geoheritage within the natural environment, e.g., any impacts on UNESCO Global Geoparks, of which we currently have three on the island of Ireland; Copper Coast in Co. Waterford, Burren and Cliffs of Moher in Co. Clare, and Cuilcagh Lakelands in Cavan and Fermanagh should be considered (where applicable) in this section.

Indirect impacts such as material use for extensive landscaping and public realm should also be considered.

Water

Tourism uses can be water intense, depending on development type. Recreational use of a surface water feature, water-based leisure centres etc have different impacts to standard development.

Air Quality and Climate

Tourism impact upon air quality is dependent on the activity proposed and sensitivity of the location. If the tourism project includes a large increase in transportation services, collection of baseline air emission data is advised. Transportation emissions affect not only air quality, but also greenhouse gases. Changing climatic patterns due to climate change should be factored into this analysis.

Noise and Vibration

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however the impact upon tourism of issues of noise and vibration can be significant. Construction adjoining hotels for example should consider the sensitivity of the development and ensure mitigation is in place.

Material Assets; Traffic and Transport

The different transport patterns associated with tourism activities is a key impact of tourism and should be considered especially for tourism projects. These produce temporal and seasonal changes on the norm and specialist consideration and interpretation should be given. Tourism proposals should, where possible, be well served by public transport and should be accessible by modes other than the car. The impact of traffic on tourism assets can be substantial and can vary in severity according to season, the weather, etc. The impact of construction traffic can be a particular concern in tourism sensitive areas in terms of noise pollution and visual impact. The construction programme of developments should work to avoid peak tourism periods in tourism areas and should consider planned or anticipated tourism events and festivals.

Cultural Heritage

Cultural heritage can be a key component of tourism projects and the impact of tourism on the maintenance of cultural heritage should be given the utmost consideration, whether positive or negative. As a tourism attraction, cultural heritage should be strongly considered in non-tourism developments and the impact upon tourism considered as a potential impact.

Archaeology

Archaeology can be of tourism interest and can be an attractive or key component of tourism projects. Archaeology can be a tourism attractor and given that national policy emphasis on the non-renewable nature of the archaeology and archaeological heritage, focus should be a presumption in favour of its preservation in-situ or where preservation in-situ is not the option chosen, there must be preservation by record (i.e. archaeological excavation and recording must take place) in line with statutory requirements.

Material Assets; Waste Management

Tourism is a resource heavy activity and can impact waste streams and waste segregation. Impacts here should be considered strongly and with knowledge of the variation that arises from the particular tourist activity. Waste and Waste disposal issues can also impact the perception of an unspoiled environment, effecting tourism, which should be considered.

Material Assets

Material assets outside of the material assets already referenced that should be considered are built services (utilities) and infrastructure. Tourism development should include impact assessment on built services (utilities) and infrastructure while non tourism related development should consider the effect on tourism, which should be considered.

Landscape

The visual impact of a tourism development, especially in locations which are visually sensitive or renowned for their scenic or landscape beauty, should be considered carefully. A development intended to utilise or enjoy a particular vista or environment should minimise impact upon that environment.

Major Accident and Natural Disaster

There is a requirement for tourist developments to describe expected significant effects on the environment of the proposed development's vulnerability to major accidents and/or natural disasters relevant to it. Where appropriate measures should be identified to prevent or mitigate the significant adverse effects of such accidents or disasters, including resulting from climate change, on the environment and detail the preparedness for the proposed response.

Interaction of Impacts

Where two or more environmental impacts combine or interact they should be considered under the prescribed topics. It is best practice to provide a table of interactions within an EIAR or EIA Screening Report.

Cumulative Impact

The cumulative impact is that of the project combined with any known likely project which will interact or compound an environmental impact.

Transboundary Impact

Transboundary impacts should be included in EIAR. In the case of tourism, especially international travel, the transboundary impacts may not be proximate to the EIAR site.

Mitigation & Monitoring

Mitigation should follow the hierarchy of minimisation in descending order of preference-Avoid, Reduce, Remedy.

Avoid sensitive tourism resources- such as views, access and amenity areas including habitats as well as historical or cultural sites and structures.

Reduce the exposure of sensitive resources to excessive environmental impact.

Reduce the adverse effects to tourism land uses and patterns of activities, especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance.

Remedy any unavoidable significant residual adverse effects on tourism resources or activities.

Mitigation measures must be measurable and achievable within the bounds of the project.

With regard to Monitoring, Article 8a of the EIA Directive requires that:

1. 'The decision to grant development consent shall incorporate at least the following information ...

(b) any environmental conditions attached to the decision, a description of any features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment as well as, where appropriate, monitoring measures. ... 4 Member States shall ensure that the features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment are implemented by the developer, and shall determine the procedures regarding the monitoring of significant adverse effects on the environment. The type of parameters to be monitored and the duration of the monitoring shall be proportionate to the nature, location and size of the project and the significance of its effects on the environment. Existing monitoring arrangements resulting from Union legislation other than this Directive and from national legislation may be used if appropriate, with a view to avoiding duplication of monitoring.'

Residual Impacts

The residual impacts are the final predicted or intended impacts which occur after the proposed mitigation measures have been implemented.

8. Sources of information on Tourism

Information available online

Fáilte Ireland

Fáilte Ireland offers detailed research analysis and insights into the Irish Tourism Industry. The National Tourism Development Authority has a portfolio of research across a number of areas including facts and figures, Environmental Surveying and Monitoring, briefing papers and reports and visitor feedback. The Fáilte Ireland website has a dedicated research library which can be accessed <u>here</u>

Fáilte Ireland also manages an environmental surveying and monitoring database as part of the Wild Atlantic Way Operational Programme which can be accessed <u>here</u>. The purpose of this is to work with and demonstrate to our stakeholders and partners that we are committed to the sustainable development of the Wild Atlantic Way, and to be able to pre-empt and avoid environmental effects in the future should they occur.

Discover Ireland:

Operated by Fáilte Ireland, the Discover Ireland website includes comprehensive information on tourist attractions in destinations all around Ireland, including listings for activities, accommodation, events and experiences for every county, major town and region in Ireland. The website features elements from the four destination brands – Wild Atlantic Way, Ireland's Ancient East, Ireland's Hidden Heartlands and Visit Dublin and can be accessed here.

Tourism Ireland

Tourism Ireland is responsible for marketing the island of Ireland overseas as a holiday and business tourism destination. Tourism Ireland publishes a range of research documents including; visitor facts and figures, seasonal updates and industry insights which are accessible <u>here</u>

Local Authorities

Local Authorities are an invaluable source of information. They produce tourism strategies and audits of tourism assets within their jurisdiction. Local authorities will also produce landscape and seascape studies. Protected views and prospects as well as the record of protected structures and other designated protected buildings are contained within the Statutory Development Plans.

Regional Assemblies

Regional Assemblies can also be consulted on high level strategic tourism and potential Regional Spatial and Economic Strategies (RSESs) should be consulted.

Central Statistics Office

The Central Statistics Office (CSO) is Ireland's national statistical office and their purpose is to impartially collect, analyse and make available statistics about Ireland's people, society and economy. The Tourism and Travel Section of the Central Statistics Office is the major source for tourism statistics in Ireland and is updated regularly.

| From: | DECC GSI Planning <gsiplanning@gsi.ie></gsiplanning@gsi.ie> |
|--------------|---|
| Sent: | Thursday 22 February 2024 13:01 |
| То: | Malena Sara Thren; Thomas Blackwell |
| Cc: | DECC GSI Planning; DECC Planning Advisory |
| Subject: | RE: EIS 24/18 - Scoping Letter - Alterations to Meenbog Windfarm |
| Attachments: | 24_18 Alterations Meenbog Windfarm_Final.pdf; GSI datasets relevant to EIA & SEA_ 20210421.pdf |

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Dear Malena, Thomas,

With reference to your email received on the 22 January 2024, concerning the Informal Environmental Scoping Request for Alterations to Meenbog Windfarm located in Meenbog (and surrounding townlands), Co. Donegal, please find attached response and dataset sheet from Geological Survey Ireland.

Yours sincerely, Trish Smullen



Trish Smullen Geoheritage & Planning.

Geological Survey Ireland, Booterstown Hall, Booterstown Ave., Co. Dublin A94 N2R6.Email: trish.smullen@gsi.iewww.gsi.ie

A division of the Department of the Environment, Climate and Communications.

From: DECC GSI Planning <GSIPlanning@GSI.ie>
Sent: Monday 22 January 2024 16:38
To: Patricia Smullen (DECC) <Trish.Smullen@gsi.ie>
Cc: DECC GSI Planning <GSIPlanning@GSI.ie>
Subject: EIS 24/18 - Scoping Letter - Alterations to Meenbog Windfarm

EIS 24/18

Scoping Letter – Alterations to Meenbog Windfarm, Co Donegal. Request for observations by MKO. Letter with site plan is enclosed.

Regards,

John

From: Malena Sara Thren <<u>msthren@mkoireland.ie</u>>

Sent: Friday 19 January 2024 17:12

To: DECC GSI Planning < GSIPlanning@GSI.ie >

Cc: Thomas Blackwell <<u>tblackwell@mkoireland.ie</u>>; Patricia Smullen (DECC) <<u>Trish.Smullen@gsi.ie</u>>

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Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

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

| Geological Survey Ireland Programme | Dataset | Relevant EIA Topic | Coverage | Description / Notes / Limitations | Link to Geological Survey Ireland map viewer |
|--|--|------------------------------------|----------------------|--|--|
| | | | | | |
| | | | | Associated guidance documentation relating to the National Landslide | |
| Geohazards | Landslide: National landslide database and landslide susceptibility map | Land & Soil/Climate/Landscape | National | Susceptibility Map is also available. | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c |
| | | | | Provide information of historic flooding, both surface water and | |
| | | | | groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not | |
| | | | | indicate that a flood cannot occur in that location at present or in the | |
| Geohazards | Groundwater Flooding (Historic) | Water | Regional | future] | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc |
| ocondedidos | orodinawater Hooding (Historie) | water | inchional. | Provides information on the probability of future karst groundwater | |
| | | | | flooding (where available). [The maps do not, and are not intended to, | |
| | | | | constitute advice. Professional or specialist advice should be sought | |
| | | | | before taking, or refraining from, any action on the basis of the flood | |
| Geohazards | Groundwater Flooding (Predictive) | Water | Regional | maps] | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc |
| Geohazards | Radon Map | Land & Soils/Air | National | | http://www.epa.ie/radiation/radonmap/ |
| | | | | | |
| | | | | All geological heritage sites identified by Geological Survey Ireland are | |
| Geoheritage | County Geological Sites as adopted by National Heritage Plan and listed in County Development Pla | Land & Soils/Landscape | Regional | categorised as CGS pending any further NHA designation by NPWS. | https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228 |
| Geological Mapping | Bedrock geology: | Land & Soils | National | 1:100.000 scale and associated memoirs. | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0 |
| Geological Mapping | Bedrock geology. | | National | 1.100,000 scale and associated memoris. | https://ucein.maps.arcgis.com/apps/webappwewer/index.ntminind-ue/012a5502/46ea5106e/ee106ab805@scale-0 |
| Geological Mapping | Bedrock geology: | Land & Soils | Regional | 1:50.000 scale | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0 |
| O | | | | | |
| Geological Mapping | Quaternary geology: Sediments | Land & Soils | National | 1:50,000 scale | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0 |
| Geological Mapping | Quaternary geology: Geomorphology | Land & Soils | National | 1:50,000 scale | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0 |
| | | | | | |
| | | | | Broad-scale physical landscape units mapped at 1:100,000 scale in order | |
| Geological Mapping | Physiographic units: | Land & Soils | National | to be represented as a cartographic digital map at 1:250,000 scale | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a420fc54877843aca1bc075c62b |
| | | | | | |
| Geological Mapping | GeoUrban: Spatial geological data for the greater Dublin and Cork areas | Land & Soils | Regional | includes 3D models | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b79416093b6b2212a850ce6&scale=0 |
| | Geotechnical database | Land & Soils | National | Digitised geotechnical and Site Investigation Reports and boreholes which | |
| Geological Mapping Goldmine | Geotechnical database Historical data sets including geological memoirs and 6" to 1 mile geological mapping records | Land & Soils land & Soils/Water | National | can be accessed through online downloads available online | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c https://secure.dccae.gov.ie/goldmine/index.html |
| Goldmine | Historical data sets including geological memoirs and 6 to 1 mile geological mapping records | land & Solis/ Water | National | available online | https://secure.dccae.gov.le/goldmine/index.ntmi |
| Groundwater & Geothermal | Groundwater resources (aquifers) | Water | National | Data limited to 1:100.000 scale: sites should be investigated at local scale | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| orodinowater a ocothermal | oroundwater resources (adurers) | water | Huttonar | Data limited to 1:40,000 scale; sites should be investigated at local scale; | |
| Groundwater & Geothermal | Groundwater recharge. | Water | National | long term annual average recharge | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| | | | | | |
| Groundwater & Geothermal | Groundwater vulnerability. | Water | National | Data limited to 1:40,000 scale; sites should be investigated at local scale | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| | | | | Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for | |
| Groundwater & Geothermal | Group scheme and public supply source protection areas. | Water | National | private supplies. | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| | | | | Data is limited to scale of 1:40,000. Data does not include all of the source | |
| Groundwater & Geothermal | Groundwater Protection Schemes | Water | National | protections areas | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| Groundwater & Geothermal | Catchment and WFD management units. | Water | National | For areas underlain by limestone, includes karst features, tracer test | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| Groundwater & Geothermal | karst specific data layers | water | National | database; turlough water levels (gwlevel.ie). | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| Groundwater & Geothermal | Wells and Springs | Water | National | Not comprehensive, there may be unrecorded wells and springs | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| Groundwater & Geotherman | wens and Springs | Water | Nacional | Not comprehensive, there may be unrecorded wens and springs | https://dcem.maps.arcgis.com/apps/webappviewer/index.ntminid=/ebazbz3b1354b5/ab14b23a1bb/4bei |
| | | | | Not exhaustive; only those in designated SACs; could be other GWDTEs; | https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding- |
| Groundwater & Geothermal | Groundwater body Descriptions | Water | National | for more information contact NPWS / EPA / site investigations | ireland-groundwater/Pages/Groundwater-bodies.aspx |
| | | | | Also, Roadmap for a Policy and Regulatory Framework for Geothermal | |
| Groundwater & Geothermal | Geothermal Suitability maps | land & Soils/Water | National | Energy, November 2020 | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9ee46bee08de41278b90a991d60c0b9e |
| Marine & Coastal Unit | INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's | | National | | https://secure.dccae.gov.ie/GSI/INFOMAR_VIEWER/ |
| Marine & Coastal Unit | CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Head | aWater | Regional | | http://www.cherishproject.eu/en/ |
| | | | | Currently the project is being carried out on the east coast and will be | https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability- |
| Marine & Coastal Unit | Coastal Vulnerability Index (CVI). | water /Land & Soils | Regional | rolled out nationally | Index.aspx |
| | | | 1 | Consideration of mineral resources and potential resources as a material | |
| Minerals | Aggregate potential | Land & Soils/Material Assets | National | asset which should be explicitly recognised within the environmental assessment process | https://dcenr.maps.arceis.com/apps/webappyiewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956 |
| | Aggregate potential Active quarries | Land & Soils/Material Assets | National | assessment process | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aabf134441bdc995b https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aabf134441bdc9956 |
| Minerals | norre quarres | cand & JUII3 | acionai | | |
| Minerals | | 1 | 1 | Inventory and Risk Classification 2009. Environmental Protection Agency, | https://gis.epa.ie/EPAMaps/default?easting=?&northing=?&lid=EPA:LEMA Facilities Extractive Facilities |
| Minerals | | | | | |
| Minerals | Historic mines | Land & Soils/Cultural Heritage | National | Economic Minerals Division and Geological Survey Ireland (DECC). | https://www.epa.ie/enforcement/mines/ |
| | Historic mines Geochemical data: multi-element data for shallow soll, stream sediment and stream water | Land & Soils/Cultural Heritage | National Regional | | |
| Minerals | | | | Economic Minerals Division and Geological Survey Ireland (DECC). | https://www.epa.ie/enforcement/mines/ |

1. The maps and data listed above are available on the Geological Survey Ireland map viewer https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx

2. Please read all disclaimers carefully when using Geological Survey Ireland data

3. Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.





Malena Sara Thren Thomas Blackwell MKO Tuam Road Galway, H91 VW84

22 February 2024

Re: Informal Environmental Scoping Request for Alterations to Meenbog Windfarm located in Meenbog (and surrounding townlands), Co. Donegal

Your Ref: 220623 Our Ref: 24/18 [c.f. 21/292]

Dear Malena, Thomas,

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

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data is made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases this data is a baseline or starting point for further site specific assessments.

With reference to your email received on the 22 January 2024, concerning the Informal Environmental Scoping Request for Alterations to Meenbog Windfarm located in Meenbog (and surrounding townlands), Co. Donegal, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

Geoheritage

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

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

The audit for Co. Donegal was carried out in 2020. The full report details can be found <u>here</u>. Our records show that there is a CGS in the study area of the proposed wind farm.

Barnesmore Gap, Co. Donegal (GR 203393, 385896), under IGH theme: IGH 7 Quaternary. The Barnesmore Gap is a deep pass oriented southwest–northeast, comprising a deep glacial channel. It splits the Blue Stack Mountains in two, with Croaghconnellagh on the northwest side and Barnesmore Mountain on the southeast. The Gap is a straight, steep-sided, rocky valley, just over 4km long and up to 200m deep. It hosts long, linear accumulations of lateral moraine debris on either side of the valley. The Gap valley follows the Barnesmore Fault, one of the major structural features of the bedrock geology of Donegal.





Ice flowed from the northeast down the Gap towards the southwest. As well as this, granite which crops out on either side of the Gap, has been carried southwestwards towards Donegal Bay. The geomorphology of the Gap is quite spectacular and as a glacial channel and moraines are readily seen even by the untrained eye. Link to Site Report: <u>DL002</u>.

Any future wind-farm development and access road construction in the surrounding area may pose a threat to the integrity of the site. This site should be assessed as an environmental constraint. Ideally, the site should not be damaged or integrity impacted or reduced in any manner due to the proposed construction and modification of access roads, from traffic due to access road construction and turbine installation. This would include impacts that may be related to altered drainage patterns, changes in soil profiles and structures etc. However, this is not always possible, and in this situation appropriate mitigation measures should be put in place to minimize or mitigate potential impacts.

We would also ask that the design of any future development considers the use of information panels as appropriate to highlight the significance of the impacted CGS. Please contact Clare Glanville (<u>Clare.Glanville@gsi.ie</u>) for further information and possible mitigation measures if applicable.

Groundwater

Geological Survey Ireland's <u>Groundwater and Geothermal Unit</u>, provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our <u>Map viewer</u> which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.

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

<u>GWClimate</u> is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the <u>Map viewer</u>.

Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. **The Groundwater Protection Response overview and link to the main reports is here:** <u>https://www.gsi.ie/en-ie/programmes-and-projects/groundwater/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection/county-groundwater-protection-schemes/Pages/default.aspx</u>

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 <u>here</u>, in your future assessments.

Please note we have recently launched QGIS compatible bedrock (100K) and Quaternary geology map data, with instructional manuals and videos. This makes our data more accessible to general public and external stakeholders. QGIS compatible data can be found in our downloadable bedrock 100k .zip file on the <u>Data & Maps</u> section of our website.





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 wind farm area. The Landslide Susceptibility map indicates variable landslide susceptibility within the study area, including areas of 'Moderately High' to 'High' susceptibility. We note in the scoping document, reference to the peat slide close to the wind farm that occurred in November 2020. The potential for run-out from peat failure should be addressed.

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 <u>Map Viewer</u>. Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.

Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans, and is described in more detail under 'Groundwater' above.

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 <u>Minerals section</u> of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our <u>Map Viewer</u>.

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 development are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.

Geochemistry of soils, surface waters and sediments

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx.

Geophysical data

Geological Survey Ireland produces high-resolution geophysical data (Magnetic field, electrical conductivity, natural gammaray radiation) of soils & rocks as part of the <u>Tellus programme</u>. These data currently cover approximately 75% of the country and provide supporting geological information on a regional scale useful for assessing environmental impact and risk.

Guidelines

The following guidelines may also be of assistance:

- Institute of Geologists of Ireland, 2013. Guidelines for the Preparation of the Soils, Geology and Hydrogeology Chapters of Geology in Environmental Impact Statements.
- EPA, 2022. Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)





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. In this particular case, any raw data (e.g., lidar, peat probe depths) relating to peat would be especially appreciated. 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 the Geological Mapping Unit, at mailto:GeologicalMappingInfo@gsi.e, 01-678 2795.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to the Geological Survey Ireland Planning Team at <u>GSIPlanning@gsi.ie</u>.

Yours sincerely,

Geoheritage and Planning Programme

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

| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:14 |
| То: | gsni@economy-ni.gov.uk |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Geological Survey of Northern Ireland.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin <u>mkoireland.ie</u> | +353 (0)91 735 611



McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

| From: Sent: To: Cc: Subject: Attachments: | Adam Gargan <adam.gargan@hse.ie> Thursday 22 February 2024 11:38 Malena Sara Thren Thomas Blackwell; Eve Smith; Finan Gallagher; Aoife Gardiner EIA Scoping Application for alterations to Meenbog Windfarm, Meenbog, Co. Donegal Cover Letter.pdf; EHS Submission scoping subsitute consent - Meenabog EHIS</adam.gargan@hse.ie> |
|--|---|
| Attachments: Importance: | Cover Letter.pdf; EHS Submission scoping subsitute consent - Meenabog EHIS 3676.pdf High |
| | |

Some people who received this message don't often get email from adam.gargan@hse.ie. Learn why this is important

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hello Malena,

Please see the attached HSE National Environmental Health Service response with regard to Meenbog windfarm, Co. Donegal.

Kind Regards

Adam Gargan

Oifigeach Sláinte Comhshaoil | Environmental Health Officer

Seirbhís Sláinte Comhshaoil, Ospidéal Pobail Dhún na nGall, Drumlonagher, Baile Dhún na nGall, Co Dún na nGall, F94 V670. Environmental Health Service, Donegal Community Hospital, Drumlonagher, Donegal Town, Co Donegal, F94 V670.

0871660324 | 074 91 23759 | adam.gargan@hse.ie



Need information and advice on COVID-19? Go to www.hse.ie/coronavirus

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúil don Deasc Seirbhísí ECT ar an nguthán ag <u>+353 818 300300</u> nó ar an ríomhphost chuig <u>service.desk@hse.ie</u> agus ansin glan an ríomhphost seo ded' chóras."

[&]quot;Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil . Seains gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

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Seirbhís Sláinte Comhshaoil Clinic Contae, Campas Ospidéal Naomh Conal, Leitir Ceanainn, Co. Dhún na nGall F92 FW6Y **Environmental Health Service**

County Clinic, St Conal's Hospital Campus, Letterkenny, Co. Donegal F92 FW6Y www.hse.ie finan.gallagher@hse.ie t 074 91 23759

Date: 22nd February 2024.

Re: EIA Scoping Application for alterations to Meenbog Windfarm, Meenbog, Co. Donegal.

Report to: MKO, Tuam Road, Galway, H91 VW84

Addresses of proposed development: Meenbog, Co. Donegal.

Dear Sir/Madam

Please find enclosed the HSE consultation report in respect of the above proposal. If you have any queries regarding this report, the initial point of contact is PEHO, details below.

Yours faithfully,

Finan Ballager.

Finán Ó Gallchobhair

Príomhoifigeach Sláinte Comhshaoil I Principal Environmental Health Officer

Seirbhís Sláinte Comhshaoil Clinic Contae, Campas Ospidéal Naomh Conal, Leitir Ceanainn ,Co. Dhún na nGall F92 FW6Y.

Environmental Health Service County Clinic, St Conal's Hospital Campus, Letterkenny, Co Donegal, F92 FW6Y.

0873772170 I Finan.Gallagher@hse.ie



Seirbhís Sláinte Comhshaoil

Clinic Contae, Campas Ospidéal Naomh Conal, Leitir Ceanainn, Co. Dhún na nGall F92 FW6Y

Environmental Health Service

County Clinic, St Conal's Hospital Campus, Letterkenny, Co. Donegal F92 FW6Y www.hse.ie finan.gallagher@hse.ie t 074 91 23759

HSE EIA Scoping

Environmental Health Service Submission Report

Date: 22/02/2024

Our reference: EHIS 3676

Report to: MKO, Tuam Road, Galway, H91 VW84

Type of Consultation: EIA Scoping

Proposed development: EIA Scoping Application for alterations to Meenbog Windfarm, Meenbog, Co. Donegal

Details of the application were circulated to the following HSE stakeholders on the 26/01/2024:

- Emergency Planning Kay Kennington
- Estates Helen Maher/Stephen Murphy
- Director of National Health Protection Eamonn O' Moore
- CHO Dermot Monaghan

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General Introduction

The site is located in the townlands of Croaghonagh and Meenbog, c.12km north of Donegal Town and 9km south of Ballybofey, in south County Donegal. It abuts the Northern Ireland border with County Tyrone, along its eastern boundary.

The Croaghonagh Bog Special Area of Conservation encroaches into the northern-most part of the site, in the area of the site access junction with the N15. The northern-most part of the internal access road abuts the boundary of the SAC and the route crosses an open watercourse that drains into the SAC. • The site is also in proximity to the River Finn Special Area of Conservation and is connected to it via drainage channels shown on available EPA drainage maps to drain northward, into the Mournebeg River. • Barnesmore Bog Natural Heritage Area and Croaghonagh Bog proposed Natural Heritage Area are in proximity to the site, to the south and north, respectively.

The Donegal County Development Plan 2018-2024 is the overarching policy document in relation to planning in the County area. Variation No. 2 dated 21st December 2022 contains a revised Wind Energy Policy Framework, following a Judicial Review of the original strategy contained within the development plan. Map 8.2.1 of the Variation contains a New Wind Energy Map, which identifies 'Acceptable in Principle', 'Not Normally Permissible' and 'Open to Consideration' designations. The subject site is located within the 'Not Normally Permissible' designation and the Framework provides the following description: - 'Like the other two designations, these areas were identified on foot of a comprehensive analysis of the environmental sensitivities and the wind energy potential of the County. On foot of this determination, and in-line with national guidelines, it follows that most windfarm developments will not normally be permissible. This should apply in particular to such proposals on previously undeveloped sites, inclusive of sites with a lapsed unimplemented permission (and where substantive works have not been undertaken). Notwithstanding, and having regard to previous planning assessments and decisions and the subsequent investment incurred, it is the position of Donegal County Council that a more balanced approach is required when dealing with windfarm proposals in these areas where, crucially, there is an already existing strong planning history. This refers to the following categories: Existing Windfarms; Developments under Construction; Developments Where Permissions Have Lapsed but Where Substantial Works Have Been Completed; and Sites with a Live Permission but not yet started. For such sites, it is considered reasonable to allow for the consideration of proposals for the augmentation, upgrade and improvement of such developments in accordance with the details set out in Policy E-P-12.

Review of history of site in relation to the scoping request:

Information was reviewed within the context of Leave to Apply Substitute Consent S177. Inspector's reports submitted to An Bord Pleanála and wider case were taken into consideration.

Planning Enforcement UD20254: Ongoing investigation in relation to potential noncompliance with conditions attached to permission Ref. ABP-300460-17 and other unauthorised development at the site. The Planning Authority's records on the investigation indicate that a Warning Letter was issued on 23rd November 2020, following receipt of a complaint, and that multiple specified instances of further engagement took place with the applicant up to the point at which it was advised that Substitute Consent is required.

This report relates to an application for a scoping in relation to a leave to Apply for Substitute Consent, under Section 177C (2)(b) of the Planning and Development Act, 2000, as amended, in respect of alterations to a wind farm at Meenbog, County Donegal. This report request is for scoping and has been approached as if this is a green field site – looking at a baseline without any development present. It also takes into account significant quantified evidence of what occurred and also the mitigation and impact to remediate.

The following documents should be taken into consideration when preparing the Environmental Impact Assessment Report:

• 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

https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_plan ning_authorities_and_an_bord_pleanála_on_carrying_out_eia_-_august_2018.pdf

EU publication: Environmental Impact Assessment of Projects - Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

<u>http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf</u> 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: <u>http://www.epa.ie/pubs/consultation/reviewofdrafteisguidelinesadvicenotes</u>

Generally the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:



- 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

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 <u>www.publichealth.ie</u>

In addition to any likely significant negative impacts from the proposed development, any positive likely significant impacts should also be assessed.

The applicant should also consider the findings of the High Court judgement issued in the judicial review of the Derryadd Wind Farm. (2021 IEHC 390 [20202 No. 557 JR] P. Sweetman v An Bord Pleanála).

The HSE will consider **the final EIAR accompanying the planning application** and will make comments to the planning authority on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact. A site visit was carried out by Environmental health officer Adam Gargan on 20/02/2024.

This report only comments on Environmental Health Impacts of the proposed development within the framework of a leave to apply for Substitute Consent for alterations to the permitted Meenbog Wind Farm. It is based on an assessment of the correspondence submitted to this office dated 19th of January 2024.

The Environmental Health Service (EHS) recommends that the following matters are included and assessed in the EIAR:

- Public Consultation
- Population and Human Health
- Water (Hydrology and Hydrogeology)
- Land and Soils
- Air, Dust and Odour
- Climate Change and Opportunity for Health Gain
- Noise and Vibration
- Waste Management
- Ancillary Facilities



Cumulative Impacts

Public Consultation

The applicant should consider the appointment of a community liaison officer. Early and meaningful public consultation with the local community should be carried out to ensure all potentially significant impacts have been adequately addressed. 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. Sensitive receptors and other stake-holders 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. With the lifting of restrictions around public gatherings as a result of Covid 19 prevention measures there should be no barrier to holding public consultation events albeit within current government guidance at the time. Meaningful public consultation, where the local community is fully informed of the proposed development must be undertaken. Members of the public should be given sufficient opportunities to express their views on the proposed development.

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. To assist with the consultation and planning process it is recommended that the applicant develops a dedicated website for the proposed development. All correspondence, maps, project updates and documentation including the EIAR should be uploaded to the website. The EIAR should state the period of planning permission sought, the length of time construction is estimated to take, and if it is anticipated that the renewable energy development will be decommissioned and removed or will continue to operate (following any further planning consent) at the end of this period of planning permission (should permission be granted).

Decommissioning

The EIAR should detail the eventual fate of wind turbines, substation, and energy storage batteries and associated material, i.e. will the material be recycled or how will it be disposed of.

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 development site at the end of the planning permission period.

Siting, Location and details of Turbines/Energy Storage Batteries

The EIAR should include a map and a description of the proposed location of each of the proposed wind turbines, substation, energy storage locations and associated developments.

For example- The details (height and model) of the turbines to be installed should be available at the time planning permission is sought and included in the EIAR. Details of the foundations for the wind turbine including depth, quantity and material to be used should be included in the EIAR.

Assessment of Consideration of Alternatives

The EIAR should consider an assessment of alternatives. The EHS recommends that alternative renewable energy options to on- shore wind farms should be assessed as part of the EIAR.

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. The EIAR must also consider the appropriateness and effectiveness of all proposed mitigation measures to minimise noise and vibration. 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 back ground levels.

In addition, an assessment of the predicted noise impacts during the construction phase and the operational phase of the proposed renewable energy development must be undertaken which details the change in the noise environment resulting from the proposed development.

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.

https://www.housing.gov.ie/sites/default/files/publicconsultation/files/draft_revised_ wind_energy_development_guidelines_december_2019.pdf

Shadow Flicker

It is recommended that a shadow flicker assessment is undertaken as part of the full EIAR 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. 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.

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:

- 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 minimise 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 operator and the Local Roads Authority to clarify responsibility for the upkeep and repair of access roads during the construction phase of the project.

Surface and Ground Water Quality

The proposed scoping application for the 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 and Group Water Scheme sources and supplies should be identified in addition to any private wells supplying potable water to houses in the vicinity of the proposed development. 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. Any impacts on surface water as



a result of the construction of the underground cables should be identified and addressed in the EIAR.

Types and characteristics of potential impacts:

Notes from the Inspector's Report ABP-314062-22 Date of Site Inspection 25th July 2023.

" The alterations to internal access roads and turbine access roads/hardstanding areas involved groundworks/excavation, deposition of heavy stone material and alterations to the site surface water drainage network. The alterations to the access route to T7 and hardstanding at T9 were in response to a peat slide event (the event and subsequent engagement between the applicant, Planning Authority and the EPA is outlined in detail at Section 7 of the Planning Report submitted with the application). These works have the potential to affect the groundwater regime on this peatland site and have the ability to affect the quality and content of surface water discharges from the site. • The borrow pits involved deep excavation and removal of materials, in a number of instances with the excavated pit reused as a peat store. I observed substantial standing water in each of the borrow pits on my visit to the site. I consider the works have the potential to affect the groundwater regime on this peatland site and have the ability to affect the and content of surface water discharges from the site and have the potential to affect the groundwater regime on this peatland site and have the ability to affect the and content of surface water discharges from the site.".

Geotechnical and Peat Stability Assessment

A detailed assessment of the current ground stability of the site for the proposed renewable energy development and all proposed mitigation measures should be detailed in the EIAR. The assessment should include the 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. Information should be provided on the make and model of the turbines and on construction details for the turbine foundations, including the depth and volume of concrete required. An accurate assessment of the potential impacts of the foundations on water quality and peat stability cannot be undertaken without this information. The Environmental Health Service recommends that a detailed Peat Stability/Geotechnical Assessment of the proposed site 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)

https://www.gov.scot/binaries/content/documents/govscot/publications/adviceandguidance/2017/04/peat-landslide-hazard-risk-assessments-best-practice-



guide-proposedelectricity/documents/00517176-pdf/00517176pdf/govscot%3Adocument/00517176.pdf

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.

Cumulative Impacts

All existing or proposed wind farm developments in the vicinity should be clearly identified in the EIAR. This is a border location and consideration must be given to the Northern Ireland potential cumulative impact from wind farms adjacent to the site outside jurisdiction of ROI. The impact on sensitive receptors of the proposed development combined with any other wind farm/renewable energy developments in the vicinity should all be considered in full. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed renewable energy development.

Eip Suin

Eve Smith Oifigeach Sláinte Comhshaoil | Environmental Health Officer Environment/Climate Change, Network Support Unit (NSU)

Adam Gargan Oifigeach Sláinte Comhshaoil | Environmental Health Officer

* All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to : Finan Gallagher, Principal Environmental Health Officer, HSE West, County Clinic, St.Conal's Campus, Letterkenny Co. Donegal F92 FW6



| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:24 |
| То: | planning@donegalcoco.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Planning Donegal County Council.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin mkoireland.ie | +353 (0)91 735 611



McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:24 |
| То: | info@donegalcoco.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Roads Department Donegal County Council.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin mkoireland.ie | +353 (0)91 735 611



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| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:16 |
| То: | heritage@donegalcoco.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Heritage and Environment Donegal County Council.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

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| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:17 |
| То: | info |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Inland Fisheries Ireland.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin mkoireland.ie | +353 (0)91 735 611



McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:17 |
| То: | bogs@ipcc.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Irish Peatland Conservation Council.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

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McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:19 |
| То: | chairman@irsg.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Irish Raptor Study Group.pdf |

Dear Mr O'Toole,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

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McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:19 |
| То: | Irish Red Grouse Conservation Trust |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Irish Red Grouse Association - Conservation Trust.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin mkoireland.ie | +353 (0)91 735 611



McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:20 |
| То: | info@iwt.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Irish Wildlife Trust.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin <u>mkoireland.ie</u> | +353 (0)91 735 611



McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:20 |
| То: | info@loughs-agency.org |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Loughs Agency.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin <u>mkoireland.ie</u> | +353 (0)91 735 611



McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

| From: | DAERA Planning Response Team <planningresponse.team@daera-ni.gov.uk></planningresponse.team@daera-ni.gov.uk> |
|--------------|--|
| Sent: | Friday 1 March 2024 14:32 |
| То: | Malena Sara Thren |
| Subject: | FW: 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | PRT - Informal Environmental Scoping Request for Alterations to Meenbog |
| | Windfarm - response.pdf |

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Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good afternoon,

Please find attached response to your request. Further comments from Natural Environment Division will be forwarded on receipt.

Kind regards,

Darryn Coey | Planning Response Team | Environment, Marine and Fisheries Group | DAERA Klondyke Building | Gasworks Business Park | Cromac Avenue | Belfast | BT7 2JA | Email (planning queries): <u>PlanningResponse.team@daera-ni.gov.uk</u> | PRT Tel: 028 9056 9604 | Web: <u>https://www.daera-ni.gov.uk/</u>



Sustainability at the heart of a living, working, active landscape valued by everyone.

From: DAERA Planning Response Team
Sent: Monday, January 22, 2024 2:30 PM
To: 'msthren@mkoireland.ie' <msthren@mkoireland.ie>
Subject: RE: 220623 Scoping Letter Alterations to Meenbog Windfarm

Good afternoon,

Thank you for your email of 19 January 2024 regarding Alterations to Meenbog Windfarm which has been forwarded to me.

I have forwarded to the relevant teams in NIEA and will respond in due course.

Kind regards,

| From: | Dickson, Alan <alan.dickson@daera-ni.gov.uk></alan.dickson@daera-ni.gov.uk> |
|----------|---|
| Sent: | Monday 22 January 2024 10:07 |
| To: | Malena Sara Thren; Maddox, Lisa |
| Cc: | Thomas Blackwell; Hayes, Charlotte; Thompson, Meredith |
| Subject: | RE: 220623 Scoping Letter Alterations to Meenbog Windfarm |

You don't often get email from alan.dickson@daera-ni.gov.uk. Learn why this is important

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Hi Malena,

Unfortunately, both Lisa and I no longer work in the Catchment team. I have therefore cc'ed in two current members of the team who may be able to help you.

Kind regards

Alan

From: Malena Sara Thren <msthren@mkoireland.ie>

Sent: Friday, January 19, 2024 5:22 PM

To: Maddox, Lisa <Lisa.Maddox@daera-ni.gov.uk>

Cc: Thomas Blackwell <tblackwell@mkoireland.ie>; Dickson, Alan <Alan.Dickson@daera-ni.gov.uk> **Subject:** 220623 Scoping Letter Alterations to Meenbog Windfarm

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 FOR INTERNAL NICS STAFF ONLY - If you have any concerns regarding the email please forward to spam@finance-ni.gov.uk.

Dear Ms Maddox,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

МКО

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin mkoireland.ie | +353 (0)91 735 611



McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

Darryn Coey | Planning Response Team | Environment, Marine and Fisheries Group | DAERA Klondyke Building | Gasworks Business Park | Cromac Avenue | Belfast | BT7 2JA | Email (planning queries): <u>PlanningResponse.team@daera-ni.gov.uk</u> | PRT Tel: 028 9056 9604 | Web: <u>https://www.daera-ni.gov.uk/</u>



Sustainability at the heart of a living, working, active landscape valued by everyone.

From: Malena Sara Thren <<u>msthren@mkoireland.ie</u>>
Sent: Friday, January 19, 2024 5:22 PM
To: Maddox, Lisa <<u>Lisa.Maddox@daera-ni.gov.uk</u>>
Cc: Thomas Blackwell <<u>tblackwell@mkoireland.ie</u>>; Dickson, Alan <<u>Alan.Dickson@daera-ni.gov.uk</u>>
Subject: 220623 Scoping Letter Alterations to Meenbog Windfarm

Dear Ms Maddox,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

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Offices in Galway and Dublin <u>mkoireland.ie</u> | +353 (0)91 735 611



McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

Environment, Marine & Fisheries Group & NIEA



Your reference: Our reference: AE1-20-6330

Malena Sara Thren MKO Email: <u>msthren@mkoireland.ie</u> Planning Response Team 2nd Floor, Klondyke Building Cromac Avenue Gasworks Business Park Belfast BT7 2JA

1 March 2024

Telephone: 028 9056 9604 Email: <u>planningresponse.team@daera-</u><u>ni.gov.uk</u>

Dear Sirs,

Informal Environmental Scoping Request for Alterations to Meenbog Windfarm

I refer to your email of 19 January 2024 regarding the above and request for comments.

We are pleased to provide comments and advice on the key environmental considerations for the Environment, Marine & Fisheries Group within DAERA.

For your convenience we have provided our comments under the following topic heading:

- Drinking Water Inspectorate
- Inland Fisheries
- Water Management Unit
- Regulation Unit

If you wish to discuss anything raised in our response, please do not hesitate to contact the Planning Response Team using the contact details above.

Kind regards,

Planning Response Team

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If you are deaf or have a hearing difficulty you can contact the Department via the Next Generation Text Relay Service by dialling 18001 + telephone number.



Drinking Water Inspectorate

Northern Ireland Water Limited should be consulted for baseline data in the River Foyle and its tributaries.

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If you are deaf or have a hearing difficulty you can contact the Department via the Next Generation Text Relay Service by dialling 18001 + telephone number.



Inland Fisheries

Inland Fisheries notes the nature and location referred to in the request and would advise that given the potential for impacts are outside of Inland Fisheries jurisdiction the Loughs Agency is the lead body for provision of advice regarding impacts to salmonid and inland fisheries interests within the catchments of Lough Foyle and Carlingford Lough. Consequently, said agency should be consulted in relation to this application. DAERA Inland Fisheries will provide fisheries advice for those areas outside of the catchments of Foyle and Carlingford Loughs.

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If you are deaf or have a hearing difficulty you can contact the Department via the Next Generation Text Relay Service by dialling 18001 + telephone number.



Water Management Unit

Section Reference: WMU/ PC/35965-1

Considerations:

Water Management Unit has considered the impacts of the proposal on the surface water environment and would provide the following advice.

Explanatory Note:

Water Management Unit notes the location of this proposal. While this site is not within our jurisdiction, the following advice is still applicable and all transboundary issues should be fully considered and addressed.

Water Management Unit would direct the attention of the applicant / agent to all the Agency's Standing Advice guidance documents.

All standing advice referred to in this response unless otherwise stated can be found at the following link <u>https://www.daera-ni.gov.uk/publications/standing-advice-development-may-have-effect-water-environment-including-groundwater-and-fisheries</u>

The following Standing Advice will be particularly relevant to this application:

- Standing Advice Pollution Prevention Guidance
- Standing Advice Sustainable Drainage Systems
- Standing Advice Discharges to the Water Environment
- Standing Advice Culverting
- Standing Advice Commercial and Industrial Developments.

Water quality baseline information can be obtained from NIEA's online information request web viewer: <u>https://www.daera-ni.gov.uk/articles/information-requests</u>

The applicant should note the definition of a 'waterway' as defined under the Water (NI) Order 1999):

"Waterway" includes any river, stream, watercourse, inland water (whether natural or artificial) or tidal waters and any channel or passage of whatever kind (whether natural or artificial) through which water flows

In this Order any reference to a waterway includes a reference to the channel or bed of a waterway which is for the time being dry.

With regards to works in or near a waterway whether temporary or permanent, Water Management Unit recommends that Construction Method Statements are submitted by the contractors, for agreement with the relevant authorities, prior to any works commencing.

These statements should reflect all mitigation measures identified to prevent pollution of the water environment during the construction operational / maintenance phase of the project.

It is important that any required environmental permissions are obtained from the relevant statutory authorities.

Water Management Unit recommends the use of Sustainable Drainage Systems to deal with site drainage.

The Water Framework Directive (WFD) requires us to protect the status of water bodies from deterioration, and where necessary and practicable, to restore water bodies to good status/good ecological potential.

Acute and robust mitigation measures must be in place to protect the water bodies at the location of the development and surrounding waterbodies from any discharge into them that may damage ecological status and to ensure that the Water Framework Directive (WFD) objectives for the water bodies are not compromised nor the WFD objectives in other downstream water bodies in the same and other catchments. Potential threats include increases in sedimentation, pollution from drainage and surface water runoff.

In improving the individual elements monitored under the WFD we aim to eventually achieve Good Status in all water bodies. We would like to ensure that any emissions from the proposal do not cause any deterioration or affect the possibility of achieving Good Status, or High Status for individual elements where appropriate, in the river water bodies and any other receiving water bodies.

The applicant should ensure that measures are in place to prevent pollution of surface or groundwater as a result of the activities on site, both during construction and thereafter.

Water Management Unit would like to point out that they are not the competent authority to comment on any peat stability issues. If peat instability was likely at the site Water Management Unit would have concern regarding potential impacts on surface waters.

DAERA has also published the Draft River Basin Management Plan for the 3rd cycle period which runs from 2021-2027 which should also be considered as part of the assessment. The draft plan provides an update on the health of Northern Ireland's water environment (the status of water bodies) and sets out our targets (objectives) and actions (programme of measures) on how we want to improve our water environment in the next six years. The draft plan covers the North-Western, Neagh Bann and North Eastern river basin districts (RBD) and includes detailed status updates on each RBD.

The documents can be downloaded from the consultation webpage: <u>https://www.daera-</u><u>ni.gov.uk/consultations/consultation-draft-3rd-cycle-river-basin-management-plan-2021-2027</u>

A number of useful information sources that highlight the current state of the environment in Northern Ireland at a regional level and which could be referenced are:

Northern Ireland State of the Environment Reports: <u>https://www.daera-ni.gov.uk/publications/state-environment-report-2013</u>

Northern Ireland Environmental Statistics Reports: <u>https://www.daera-ni.gov.uk/articles/northern-ireland-environmental-statistics-report</u>

Planning Reference: LA11/2024/0100/DETEIA (LA11/2017/1134/TBA) Section Reference: AE1-24-550 (AE1-20-6330)

Considerations

The foundations of wind turbines have the potential to impact on the groundwater environment. An assessment of the development's potential risk to impact on the groundwater environment is required. This typically consists of a Water Features Survey as part of a Hydrogeological Assessment. Further information is provided within "Environmental information required" and "Baseline environmental information". This information is required either through an EIA or in support of a full planning application.

Explanatory note

These considerations are made upon review of:

MKO Ltd: Letter (dated 19 January 2024) to Ms Lisa Maddox of North Western River Basin District (MKO Ref: 220623) Re: Informal Environmental Scoping Request for Alterations to Meenbog Windfarm located in Meenbog (and surrounding townlands), Co. Donegal

The foundations of wind turbines have the potential to impact on the groundwater environment for example groundwater flow paths, groundwater receptors (aquifers) or secondary receptors (including private water supplies). Groundwater receptors should be identified and the risks of potential impact assessed and, where required, mitigation measures should be identified. These steps should be assessed through a Water Feature Survey.

Environmental information required

Please see our guidance available on the DAERA website on 'Water feature surveys' and 'Wind farms and groundwater impacts' available at: <u>https://www.daera-ni.gov.uk/publications/best-practice-guidance-documents</u>

It is recommended that the applicant seeks the professional advice of a hydrogeologist. Hydrogeologists (not hydrologists) can be identified through internet search, Yellow Pages or the Ends Directory (<u>www.endsdirectory.com</u>)

In addition to the guidance listed above Regulation Unit (Land and Groundwater Team) would direct the attention of the applicant/ agent to the planning advice which is available on the DAERA website under the Topic: **Environmental Advice for Planning** with particular reference to the following pages:

https://www.daera-ni.gov.uk/articles/development-may-have-effect-water-environmentincluding-groundwater-and-fisheries

https://www.daera-ni.gov.uk/articles/wind-energy-installations

Baseline environmental information

Groundwater baseline information which will feed into a water feature survey can be obtained from the online NIEA Catchment Data Map Viewer and the NIEA Water Information Request Viewer at <u>https://www.daera-ni.gov.uk/articles/daera-map-viewers</u>

Information on private water supplies sourced from groundwater might be obtained from:

- Northern Ireland Environment Agency groundwater monitoring sites: Information on the sites can be obtained by either the NIEA Water Information Request Viewer or by contacting <u>waterinfo@daera-ni.gov.uk</u>
- Abstraction & Impoundment Licensing: Information on the licensed sites can be obtained by either the NIEA Water Information Request Viewer or by contacting <u>waterinfo@daera-ni.gov.uk</u>
- Drinking Water Inspectorate: Information on private water supplies can be obtained by either the Drinking Water Inspectorate Map Viewer (found on DAERA Map Viewers page) or by contacting <u>dwi@daera-ni.gov.uk</u>
- Environmental Health section of the local council

Some layers displayed on the map viewers are also available as a digital dataset, which can be downloaded and used within your own project. Follow the guidance on the web page at https://www.daera-ni.gov.uk/articles/wmu-digital-dataset-downloads

| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:23 |
| То: | jmcveigh@lawco.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | North Western River Basin District1.pdf |

Dear Mr. McVeigh,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin mkoireland.ie | +353 (0)91 735 611



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| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:23 |
| То: | info@opw.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Office of Public Works.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

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Kind regards, Malena

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| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:26 |
| То: | contactus@sportireland.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Sport Ireland.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

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| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:27 |
| То: | info@seai.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Sustainable Energy Authority of Ireland.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

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Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

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| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:28 |
| То: | mail@heritagecouncil.ie |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | The Heritage Council.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

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Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin mkoireland.ie | +353 (0)91 735 611



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| From: | INFO <information@tii.ie></information@tii.ie> |
|----------|---|
| Sent: | Friday 16 February 2024 15:18 |
| То: | Malena Sara Thren |
| Subject: | TII Ref: TII24-125969 - 220623 Remedial EIAR Scoping Letter Alterations to Meenbog Windfarm, Co. Donegal |

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Dear Ms. Thren,

Thank you for your correspondence of 19 January 2024 regarding the above. Transport Infrastructure Ireland's (TII's) position in relation to your enquiry is as follows.

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

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

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national road network. 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 National Investment Framework for Transport in Ireland, and also the existing Statutory Section 28 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

In relation to your rEIAR Scoping referral, TII notes that proposals appear to indicate a site access to the N15, national road, via a direct private access, at a location on the network that is subject to a 100kph speed limit. In such circumstances, it is critical that the developer/applicant be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new developments or the generation of increased traffic from existing accesses (i.e., non-public road access) to national roads, to which speed limits greater than 50 kph apply.

Therefore, there are policy and road safety considerations that would need to be resolved in any subsequent application, as direct access or intensification of direct access to a national road, conflicts with official policy on access to national roads. Alternative arrangements to the local road network should be utilised and not direct access to the national road, contrary to the provisions of official policy. It is noted with concern, that the EIAR correspondence received does not appear to consider or address this significant and critical policy conflict.

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

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

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

• TII notes that the subject site has proposed access to the N15 national road. Access to the road network shall be developed in accordance with official policy and road safety considerations. As outlined above, access directly to a national road outside a reduced 50 – 60kph speed limit location should be avoided in accordance with the provisions of official policy. Alternative arrangements should be identified to ensure adherence to the provisions of official policy and in the interests of road user safety.

• 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, including the potential haul route.

• The developer should assess visual impacts from existing national roads.

• The developer should have regard to any Environmental Impact Assessment Report/Statement 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 the rEIAR, should have regard to TII Publications (formerly 'DMRB' and the 'Manual of Contract Documents for Road Works').

• The developer, in preparing the rEIAR, 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 rEIAR/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 be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads.

In relation to national roads, TII's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed developments, with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII 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.

• In the interests of maintaining the safety and standard of the national road network, the rEIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.

• The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.

• TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route. All national road 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.

In addition, the haul route should be assessed to confirm capacity to accommodate abnormal 'length' loads and any temporary works required are identified.

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

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

Where temporary works within any MMaRC Boundary are required to facilitate the transport of turbine components to site, the applicant/developer shall contact <u>thirdpartyworks@tii.ie</u> in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.

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

• 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.

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

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

The provision of cabling along the national road network represents a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy.

For all renewable energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives to grid connection takes place, including alternatives to public road, where appropriate.

In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance, upgrades and safety works to existing national roads.

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

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

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

I hope that this information is of assistance to you.

Yours sincerely,

Andrew Moore Senior Regulatory & Administration Executive

From: Malena Sara Thren <msthren@mkoireland.ie>
Sent: Friday, January 19, 2024 5:29 PM
To: Landuse Planning <LandUsePlanning@tii.ie>
Cc: Thomas Blackwell <tblackwell@mkoireland.ie>
Subject: 220623 Scoping Letter Alterations to Meenbog Windfarm

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Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin <u>mkoireland.ie</u> | +353 (0)91 735 611



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De réir pholasaí BlÉ An Ceart gan a bheith Ceangailte, má tá an ríomhphost seo á fháil agat lasmuigh de na gnáthuaireanta oibre, nílim ag súil le freagra ná le gníomh uait lasmuigh de do ghnáthuaireanta oibre féin mura bhfuil sé ráite go soiléir go bhfuil gá gníomhú go práinneach.

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| From: | Cillian Claffey (C) <cillian.claffey@water.ie></cillian.claffey@water.ie> |
|--------------|---|
| Sent: | Monday 19 February 2024 15:36 |
| То: | Malena Sara Thren; Thomas Blackwell |
| Cc: | Planning; Cillian Claffey (C) |
| Subject: | RE: 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | UisceÉireann_EIAScopingOpinion_Meenbog Windfarm.pdf |

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Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good afternoon Malena,

Hope you are keeping well today.

Please find attached Uisce Éireann's response to your EIA scoping request relating to Meenbog Windfarm.

Could you please notify myself OR <u>planning@water.ie</u> upon submission on this planning application so that we can get a heads up and ensure we receive the referral in adequate time.

If you have any questions, please let me know and I will do my best to assist you with your query.

Kind regards,

Cillian Claffey Development Management Planning

Mallow

Uisce Éireann Teach na hAbhann Duibhe, Mala, Co. Chorcaí, P51 K3CX **Uisce Éireann** Blackwater House, Mallow, Co. Cork, P51 K3CX

<u>M +353 89 260 3904</u> <u>cillian.claffey@water.ie</u> <u>www.water.ie</u> <u>Facebook</u> | <u>Twitter</u> | <u>LinkedIn</u>

From: Malena Sara Thren <<u>msthren@mkoireland.ie</u>>
Sent: Friday 19 January 2024 17:30
To: Planning <<u>Planning@water.ie</u>>
Cc: Thomas Blackwell <<u>tblackwell@mkoireland.ie</u>>
Subject: 220623 Scoping Letter Alterations to Meenbog Windfarm

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Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

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Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na tráchtála de a bheith mar chuid den fhaisnéis. Tá toirmeasc ar aon daoine nó aon eititis; nach dóibh siúd an fhaisnéis- aon athbhreithniú a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó aon ghníomh a bhraithfeadh ar an bhfaisnéis seo a dhéanamh agus d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dliteanas as aon ghníomh agus as aon iarmhairt bunaithe ar úsáid neamhúdaraithe na faisnéise seo. Séanann Uisce Éireann dliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo agus séanann Uisce Éireann dliteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scrios an t-ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truaillithe, idircheaptha agus i leith leasuithe neamhúdaraithe. Séanann Uisce Éireann aon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith á dhéanamh ar theachtaireachtaí chuig Uisce Éireann agus ó Uisce Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éireann atá faoi theorainn scaireanna, a bunaíodh de bhun fhorálacha na n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

Go raibh maith agat as d'aird a thabhairt.

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Thank you for your attention.

Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na tráchtála de a bheith mar chuid den fhaisnéis. Tá toirmeasc ar aon daoine nó aon eititis; nach dóibh siúd an fhaisnéis- aon athbhreithniú a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó aon ghníomh a bhraithfeadh ar an bhfaisnéis seo a dhéanamh agus d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dliteanas as aon ghníomh agus as aon iarmhairt bunaithe ar úsáid neamhúdaraithe na faisnéise seo. Séanann Uisce Éireann dliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo agus séanann Uisce Éireann dliteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scrios an t-ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truaillithe, idircheaptha agus i leith leasuithe neamhúdaraithe. Séanann Uisce Éireann aon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith á dhéanamh ar theachtaireachtaí chuig Uisce Éireann agus ó Uisce Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éireann atá faoi theorainn scaireanna, a bunaíodh de bhun fhorálacha na n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

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Thank you for your attention.



For the attention of Malena Sara Thren Environmental Scientist MKO Tuam Road, Galway, H91 VW84

By Email: msthren@mkoireland.ie

Issue Date: 19 February 2024

Re: EIA Scoping Request – Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

Dear Malena Sara Thren,

Uisce Éireann has received notification of your Environmental Impact Assessment (EIA) scoping request relating to Planree Ltd.'s forthcoming for substitute consent under Section 177E of the Planning and Development Act, 2000, as amended to regularise the planning status of certain alterations to the Meenbog Wind Farm in County Donegal.

Please see attached, Uisce Éireann's scoping opinion in relation to Water Services. On receipt of the planning referral, Uisce Éireann will review the finalised Environmental Impact Assessment Report (EIAR) as part of the planning process.

Queries relating to the terms and the EIA scoping opinions below should be directed to planning@water.ie

PP. Ali Robinson

Geoffrey Burke Connections and Developer Services

Stúrthóirí / Directors: Tony Keohane (Cathaoirleach / Chairman), Niall Gleeson (POF / CEO), Christopher Banks, Fred Barry, Gerard Britchfield, Liz Joyce, Patricia King, Eileen Maher, Cathy Mannion, Michael Walsh.

Oifig Chláraithe / Registered Office: Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86 / Colvill House, 24-26 Talbot Street, Dublin, Ireland D01NP86 Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Uisce Éireann is a design activity company, limited by shares. Cláraithe in Éirinn Uimh.: 530363 / Registered in Ireland No.: 530363.

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

Uisce Éireann PO Box 6000 Dublin 1 D01 WA07 Ireland

T: +353 1 89 25000 F: +353 1 89 25001 www.water.ie

Uisce Éireann's Response to EIA Scoping Requests

At present, Uisce Éireann does not have the capacity to advise on the scoping of individual projects. However, in general the following aspects of Water Services should be considered in the scope of an EIA where relevant;

- a) Where the development proposal has the potential to impact an Uisce Éireann Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann's Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of the report.
- b) Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.
- c) Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- e) Impacts of the development on the capacity of water services (*i.e. do existing water services have the capacity to cater for the new development*). This is confirmed by Uisce Éireann in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to Uisce Éireann to determine the feasibility of connection to the Uisce Éireann network.

All pre-connection enquiry forms are available from https://www.water.ie/connections/connection-steps/.

- f) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.
- g) In relation to a development that would discharge trade effluent any upstream treatment or attenuation of discharges required prior to discharging to an Uisce Éireann collection network.
- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers.

- Any physical impact on Uisce Éireann assets reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- j) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's 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 the applicant's intended development to <u>datarequests@water.ie</u>
- k) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- m) 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 Uisce Éireann for public supply should be identified within the report.
- n) Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a "protected"/ sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report.
- Mitigation measures in relation to any of the above ensuring a zero risk to any Uisce Éireann drinking water sources (Surface and Ground water).

This is not an exhaustive list.

Please note;

- Where connection(s) to the public network is required as part of the development proposal, applicants are advised to complete the Pre-Connection Enquiry process and have received a Confirmation of Feasibility letter from Uisce Éireann ahead of any planning application.
- Uisce Éireann will not accept new surface water discharges to combined sewer networks.

| From: Sent: | Sabine Browne <sabine.browne@waterwaysireland.org> Monday 22 January 2024 08:24</sabine.browne@waterwaysireland.org> |
|----------------|--|
| То: | Malena Sara Thren |
| Cc: | Thomas Blackwell |
| Subject: | RE: 220623 Scoping Letter Alterations to Meenbog Windfarm |

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Good morning Malena,

This is not within any Zone of Influence of our waterways so we will not be commenting.

Kind regards,

Sabine Browne

From: Malena Sara Thren <msthren@mkoireland.ie>
Sent: Friday, January 19, 2024 5:30 PM
To: Sabine Browne <Sabine.Browne@waterwaysireland.org>
Cc: tblackwell <tblackwell@mkoireland.ie>
Subject: 220623 Scoping Letter Alterations to Meenbog Windfarm

Dear Ms. Browne,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin <u>mkoireland.ie</u> | +353 (0)91 735 611



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| From: | Malena Sara Thren |
|--------------|---|
| Sent: | Friday 19 January 2024 17:09 |
| То: | info@derrystrabane.com |
| Cc: | Thomas Blackwell |
| Subject: | 220623 Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Derry City and Strabane District Council.pdf |

Dear Sir or Madam,

Please find attached the scoping letter regarding a Substitute Consent Application for Alterations to Meenbog Windfarm, Co. Donegal.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development. If you have any queries, please do not hesitate to contact me.

Kind regards, Malena

Malena Sara Thren Graduate Environmental Scientist

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin <u>mkoireland.ie</u> | +353 (0)91 735 611



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Derry/Strabane, Planning Department Derry City and Strabane District Council 98 Strand Road, Derry, BT48 7NN

Tel +44 (0)2871 253 253 Planning@derrystrabane.com www.derrystrabane.com

| Malena Sara Thren | Date: | 2 February 2024 |
|----------------------------------|--------------------|-----------------------------|
| MKO - Planning and Environmental | Your Ref: | |
| Consultants | Our Ref: | LA11/2024/0100/DETEIA |
| Tuam Road | | (Please quote at all times) |
| Galway | Places | |
| H91 VW84 | Please Contact: | |
| Ireland | Contact Number: | 0 8 FED 2024 |
| Door Sir/Madam | Number. | 2206220623 Aine Bourke |

Dear Sir/Madam

Location: Meenbog Wind Farm, 19 km West of Castlederg

Proposal: Informal Environmental Scoping Request for Alterations to Meenbog Windfarm located in Meenbog (and surrounding townlands), Co. Donegal

Thank you for your application for Request for EIA Determination received on 2 February 2024 regarding the above proposed development.

Please note that when validated the planning application, plans, maps, drawings and any associated documentation, will appear on the Planning Register and, will also be published on the NI Regional Planning System through the Public Portal https://planningregister.planningsystemni.gov.uk/. Other information submitted in relation to the planning application during the course of assessing, including consultation responses, objection and supporting letters, will also be published on the Portal in due course.

The Council will process your information in line with the GDPR requirements. A copy of the full Privacy Statement is available at www.infrastructure-ni.gov.uk/dfiprivacy alternatively you can contact the relevant Data Protection Officer listed and request a copy of the Statement to be posted directly to you. The Council will take extreme care not to publish signatures, personal telephone numbers, personal email addresses and any sensitive personal data received such as medical or financial evidence.

The viewing of planning applications online is a service aimed at improving overall accessibility of the planning process. You can track the progress of your planning application online by logging onto the Public Portal and entering your planning application reference number. If you do not have access to the Public Portal, you can call into this office during normal office hours and we will make the information available to you. If you wish to view the main planning file you can do so by making an appointment to view during normal office hours. You should note, however, that the main file is a working document and at certain times of the process will not be immediately available. An appointment is therefore essential.

There are a number of key stages in processing a planning application before it reaches a final decision, therefore the length of the determination process will vary depending on the complexity of the application. You can however keep track of your application by checking the Public Portal or by contacting this office.

Yours faithfully

{|

for Derry City and Strabane District Council Planning Manager

From: Sent: To: Cc: Subject: Attachments: Aine Bourke Tuesday 5 March 2024 09:27 Malena Sara Thren Meabh Cleary FW: LA11/2023/0100/DETEIA - Meenbog Wind Farm LA11_2024_0100_DETEIA Loughs Agency.pdf; Meenbog WF alterations RSPB response 01.03.24.pdf

Hi Malena,

Please see below and attached from Derry Strabane Council

Kind regards, Áine

Áine Bourke BA(Hons) MPlan MRTPI MIPI

Project Planner

MKO Tuam Road, Galway, H91 VW84

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From: Danielle Moore <Danielle.Moore@Derrystrabane.com>
Sent: Tuesday, March 5, 2024 8:26 AM
To: Aine Bourke <abourke@mkoireland.ie>
Subject: RE: LA11/2023/0100/DETEIA - Meenbog Wind Farm

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Morning Aine

Please see attached a further two consultation responses which have been returned to Council in recent days; from RSPB and Loughs Agency.

Kind Regards

Danielle Moore

From: Sent: To: Subject: Aine Bourke Thursday 28 March 2024 11:48 Malena Sara Thren FW: LA11/2024/0100/DETEIA - Meenbog Wind Farm - 220623

Kind regards, Áine

Áine Bourke BA(Hons) MPlan MRTPI MIPI Project Planner

MKO Tuam Road, Galway, H91 VW84

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From: Danielle Moore <Danielle.Moore@Derrystrabane.com>
Sent: Tuesday, February 27, 2024 12:46 PM
To: Aine Bourke <abourke@mkoireland.ie>
Cc: Meabh Cleary <mcleary@mkoireland.ie>; Malena Sara Thren <msthren@mkoireland.ie>; Thomas Blackwell
<tblackwell@mkoireland.ie>
Subject: RE: LA11/2024/0100/DETEIA - Meenbog Wind Farm - 220623

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Afternoon Aine

Apologises that you appear to have had trouble contacting me, can I ask when you attempted to make contact? And if you spoke to anyone in the planning department or left a message? I should have been available to reach via phone at any time through the working day, so just want to chase this up, as I have recently changed post and perhaps the wrong extension is being used, thanks.

As advised Council sent the information submitted to a range of consultees to gather information on any issues which may arise for them in relation to these alterations. 'Northern Ireland Electricity (NIE) Wind Farm Development' requested that a P1W form with co-ordinates of the Wind Turbines be provided to allow NIE networks to carry out the necessary assessments, therefore upon their request I contacted your office to ask for this information. I am unsure why they have requested this information, but followed up on their request. I do

appreciate that your submission notes, 'There are no substantive alterations to the Meenbog Wind Farm layout and no changes to the location, or size of any of the consented wind turbines.' I will highlight this to NIE once again.

Council note the timeline on submission of the substitute permission application, and will work now to collate the information received from consultees to date and return to you as soon as possible.

Kind Regards

Danielle Moore

Danielle Moore

Planning Officer Derry City and Strabane District Council 98 Strand Road Derry BT48 7NN

Tel no: 028 71253253 Email: <u>danielle.moore@derrystrabane.com</u>



From: Aine Bourke <abourke@mkoireland.ie>
Sent: 27 February 2024 12:07
To: Danielle Moore <Danielle.Moore@Derrystrabane.com>
Cc: Meabh Cleary <mcleary@mkoireland.ie>; Malena Sara Thren <msthren@mkoireland.ie>; Thomas Blackwell
<tblackwell@mkoireland.ie>
Subject: RE: LA11/2024/0100/DETEIA - Meenbog Wind Farm - 220623
Importance: High

Hi Danielle

I hope you are well. I have been trying to phone in relation to the below, but have been unable to make contact.

I spoke to you about 2 weeks ago in relation to Meenbog and the scoping request our team issued to Derry Strabane Council. We note your response seeking forms re the turbine details to be filled out.

As you will note in the scoping request and from our earlier conversation, this application is a substitute application for a number of deviations to the permitted wind farm, and will not be seeking permission for any turbine specific infrastructure or permission for the windfarm itself, which already has planning permission, and is under construction.

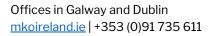
We would be most grateful if you would advise on the nature and need for this information requested below, at your earliest convenience.

As discussed previously, we are intending to lodge this substitute consent application imminently in the coming days and would welcome any comments in respect of the deviations to which the substitute consent application relates.

Kind regards, Áine

Áine Bourke BA(Hons) MPlan MRTPI MIPI Project Planner

MKO Tuam Road, Galway, H91 VW84





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From: Danielle Moore <<u>Danielle.Moore@Derrystrabane.com</u>> Sent: Monday, February 19, 2024 9:33 AM To: Malena Sara Thren <<u>msthren@mkoireland.ie</u>> Subject: LA11/2024/0100/DETEIA - Meenbog Wind Farm

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Morning Malena

NIE Windfarm Developments department has asked that you please complete the attached form (with co-ordinates of the Wind Turbines) and return, to allow for NIE Networks to carry out the necessary assessments.

If you could please complete this and return at your earliest convenience I will forward it to them for assessment.

Kind Regards

Danielle Moore

Planning Officer Derry City and Strabane District Council 98 Strand Road Derry BT48 7NN

Tel no: 028 71253253 Email: <u>danielle.moore@derrystrabane.com</u>



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Tel no: 028 71253253 Email: danielle.moore@derrystrabane.com



From: Aine Bourke <abourke@mkoireland.ie>
Sent: 29 February 2024 18:10
To: Danielle Moore <<u>Danielle.Moore@Derrystrabane.com</u>>
Subject: RE: LA11/2023/0100/DETEIA - Meenbog Wind Farm

Hi Danielle

Thank you for issuing the scoping responses.

Kind regards, Áine

Áine Bourke BA(Hons) MPIan MRTPI MIPI

Project Planner

MKO Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin mkoireland.ie | +353 (0)91 735 611



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From: Danielle Moore <<u>Danielle.Moore@Derrystrabane.com</u>> Sent: Thursday, February 29, 2024 10:38 AM To: Aine Bourke <<u>abourke@mkoireland.ie</u>> Subject: LA11/2023/0100/DETEIA - Meenbog Wind Farm

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Morning Aine

Please see attached the consultation responses received to date in relation to the application above. A number of consultations remain outstanding inc; GSNI, DFE Energy Division, DFI Rivers, DFI Roads Omagh, Environmental Health Department, Lough Agency, NIE Windfarm Developments, NIEA, Royal Society of the Protection of Birds.

Council has reviewed your submission and would ask that your full Environmental Impact Assessment Report consider the impact of the works on the areas of Special Areas of Conservation (River Finn SAC, River Foyle and Tributaries SAC, Croaghnoagh Bog SAC and Ardnamona Wood SAC) and Lough Eske. Council would also ask for consideration of the visual impact of this development from the Derry City and Strabane District Council area.

Council will issue a letter accompanied by all consultee responses once they have been received.

Kind Regards

Danielle Moore

Planning Officer Derry City and Strabane District Council 98 Strand Road Derry BT48 7NN

Tel no: 028 71253253 Email: danielle.moore@derrystrabane.com



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Dfl Roads



Consultation Response

Application Ref: LA11/2024/0100/DETEIA*

Date of Response 28th February 2024

In response to consultation dated 8th February 2024, Dfl Roads comments as follows:

No traffic or transport related information has been submitted with this application.

As the majority of infrastructure is already in place, Dfl Roads' primary concern relates to the potential haul routes for the wind turbine components. If any haul routes are to include roads within Northern Ireland, Dfl Roads will require additional information.

Dfl Roads do not require an Environmental Impact Assessment, however if Council Planning determine that an EIA is required, then it should take account of any transport impact within Derry City and Strabane District Council area.

Issued on behalf of Development Control Section, Dfl Roads – Western Division

Case Officer:

J Roulston

* As a non-statutory application, this consultation is not subject to Council's 21 day response target.



City of Derry Airport Consultation Response

- Reference LA11/2024/0100/DETEIA
 - Authority Derry City and Strabane District Council
 - Address Meenbog Wind Farm, Co. Donegal (19 km West of Castlederg)
- Category

Consultation Type

Local Non-Statutory

Description

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Informal Environmental Scoping Request for Alterations to Meenbog Windfarm located in Meenbog (and surrounding townlands), Co. Donegal

| Date of Response | 20 February 2024 |
|------------------|--|
| Response | On the basis of the information available City of Derry Airport is content with the development as proposed. |
| Reason | This proposal will have no adverse effect on City of Derry Airport operations. |
| Issued By | M Edwards ATS Manager |
| Department | ATS |



We have assessed this proposal with regard to both the fixed radiolinks and ST radiolinks that NIW operate, and can therefore respond 'No objection'.

(Magdalene Ltd)., on behalf of NIW Information Services)

Shared Environmental Service Silverwood Business Park 190 Raceview Road Ballymena Co. Antrim BT42 4HZ

21/02/2024

Planning Reference: LA11/2024/0100/DETEIA

Location: Meenbog Wind Farm, Co. Donegal (19 km West of Castlederg)

Proposal: Informal Environmental Scoping Request for Alterations to Meenbog Windfarm located in Meenbog (and surrounding townlands), Co. Donegal

Consultation Type: Environmental Impact Assessment (EIA) 8

Shared Environmental Service (SES) advises that this application is not wholly or partly in a sensitive area within the meaning of Part 1, Regulation 2 (2) (f) of The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017.

The proposed site is hydrologically connected to the River Finn SAC, River Foyle and Tributaries SAC and Croaghnoagh Bog SAC. It may also have hydrological connections to Lough Eske and Ardnamona Wood SAC via being in the same catchment area. The potential for a likely significant effect on site selection features or an adverse effect on site integrity cannot be ruled out at this stage.

Derry City and Strabane District Council is advised to consult Shared Environmental Service on the Northern Ireland Planning Portal, so that the proposal can be considered in accordance with the requirements of Regulation 43 (1) of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended).

If it is determined that an EIA is required SES requests that a shadow Habitats Regulations Assessment (sHRA) is undertaken by the applicant in consultation with the Northern Ireland Environment Agency (NIEA) which is best placed to provide the necessary information to inform the ES and sHRA. The sHRA should be included as a stand-alone document or Annex to the ES and include mitigation specific to the sites identified above. The EIA should be consistent with the information in and findings of the sHRA.

ses@midandeastantrim.gov.uk

| From: | riain McLaughlin <riain.mclaughlin@loughs-agency.org></riain.mclaughlin@loughs-agency.org> |
|--------------|--|
| Sent: | Monday 4 March 2024 15:02 |
| To: | Malena Sara Thren |
| Subject: | Scoping Letter Alterations to Meenbog Windfarm |
| Attachments: | Meenbog rEIAR scoping request (R).pdf |

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Hi Malena,

Please find attached response to informal consultation request on Meenbog rEIAR scoping.

Thanks,

Riain







Ar mhaithe le cleachtas na gcáipéisí leictreonacha a chur chun cinn agus le bheith níos boige ar an chomhshaol, iarrtar ort a mheas an gá duit an r-phost seo a chló amach. Tá an r-phost seo faoi rún agus tá a úsáid beartaithe don duine ar cuireadh chuige é amháin. Is leis an údar amháin aon dearcthaí nó barúlacha atá léirithe ann agus ní gá gurb ionann iad agus dearcthaí de chuid Ghníomhaireacht na Lochanna. Más amhlaidh nach tú an faighteoir atá beartaithe, bí ar an eolas go bhfuair tú an r-phost seo de bhotún agus go bhfuil dianchosc ar aon úsáid, craobhscaoileadh, seoladh ar aghaidh, cló amach, nó cóipeáil a dhéanamh ar an r-phost seo. Má tá an r-phost seo faighte agat de bhotún, iarrtar ort dul i dteagmháil leis an tseoltóir. D'fhéadfadh ábhar an r-phoist seo agus aon cheangailteáin nó freagraí a bheith faoi réir nochtadh poiblí faoi Shaoráil Faisnéise (Cód Cleachtais) nó faoi na Rialacháin um Fhaisnéise ar an Chomhshaol, ach amháin i gcás díolúine.

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Thomas Blackwell MKO Tuam Road Galway H91 VW84

04 March 2024

Dear Sir/Madam

Environmental Scoping Request for Alterations to Meenbog Windfarm located in Meenbog (and surrounding townlands), Co. Donegal

Thank you for your recent correspondence dated 19th January in relation to the above-mentioned proposed development. Loughs Agency is the statutory body charged with the conservation, protection and development of inland fisheries within the Foyle and Carlingford systems, the promotion of development of Loughs Foyle and Carlingford, and catchments for commercial and recreational purposes in respect of marine, fisheries and aquaculture issues and the development of marine tourism.

Loughs Agency has considered the information provided and requests that macroinvertebrates scores (biological monitoring working party/BMWP) are considered as part of the remedial Environmental Impact Assessment Report (rEIAR). Loughs Agency also request that any alterations proposed are appropriately assessed in terms of impacts on peat stability throughout

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the site. In addition, in the instance of further stability failures on the site, appropriate measures are in place to prevent impacts on the aquatic environment.

The applicant should demonstrate best environmental practice when working close to watercourses. The potential for deleterious matter to enter a watercourse is of primary concern. Impacts on the aquatic environment such as a decrease in water quality can cause a significant impact upon various life history stages of fish species.

The applicant should also be aware that it is an offence under section 41 of the Foyle Fisheries Act (Northern Ireland) 1952 to cause pollution which is detrimental to fisheries interests.

The applicant should also be aware that it is an offence under section 171(1) of the Fisheries (Consolidation) Act 1959, as extended by Section 10 of the Foyle Fisheries (Amendment) Act, 1961 and as amended, to cause pollution which is detrimental to fisheries interests.

Environmental Consultation Officer

On behalf of the Loughs Agency

| From: Sent: | Housing Manager DAU <manager.dau@npws.gov.ie> Monday 4 March 2024 16:48</manager.dau@npws.gov.ie> |
|----------------|---|
| То: | Malena Sara Thren |
| Subject: | Donegal G Pre Meenbog Windfarm |
| Attachments: | Donegal G Pre Meenbog Windfarm.pdf |

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A chara

Please find attached Archaeological and Nature Conservation observations/recommendations for the above mentioned G Pre-planning.

In addition, please acknowledge receipt of the attached letter (as required under Article 29(2) of the Planning & Development Regulations 2001).

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: referrals@npws.gov.ie

Kind regards,

David O'Connor Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta Department of Housing, Local Government and Heritage Aonad na nIarratas ar Fhorbairt Development Applications Unit Oifigí an Rialtais Government Offices Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90 Newtown Road, Wexford, County Wexford, Y35 AP90

David.oconnor@npws.gov.ie Manager.DAU@npws.gov.ie An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta Department of Housing, Local Government and Heritage



Ref: Environmental Scoping Request for Alterations to Meenbog Windfarm

(Please quote in all related correspondence)

04 March 2024

Malena Sara Thren MKO Tuam Road Galway H91 VW84 Via Email: <u>msthren@mkoireland.ie</u>

A Chara,

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations of the Department coordinated by the Development Applications Unit under the stated heading:

Nature Conservation

The following observations are made by the Department in its role as a prescribed body under planning legislation and as the authority with overarching responsibility for nature conservation and the nature directives (i.e. the Birds and Habitats Directives) and wider biodiversity.

The Department refers to the request regarding the scoping for a Remedial Environmental Impact Assessment Report and a Remedial Natura Impact Statement be submitted with the application for substitute consent for Meenbog wind farm development.

These observations are intended to assist you in meeting the obligations that may arise in relation to European sites, other nature conservation sites, and biodiversity and environmental protection in general in the context of the current application. The observations are not exhaustive, and are made without prejudice to any recommendation that may be made by this Department in the future. Data collected and surveys carried out in connection with this proposed development may raise other issues that have not been considered here.

The National Parks and Wildlife Service website has recently been updated and should be consulted with regard to the impact of planning and development on nature conservation. The following link gives extensive details on the standards and content that NPWS expects from applications. <u>https://www.npws.ie/development%20consultations</u>



In the preparation of the Remedial Environmental Impact Assessment Report and a Remedial Natura Impact Statement for application for substitute consent, the Department recommends inclusion of:

- 1. A clear summary of the Meenbog landslide, its causes, and its impacts on European sites and their Qualifying Interests and on Annex 1 habitats outside of European sites.
- 2. A detailed outline of each of the 25 deviations from the original planning consent, and an analysis of the ecological impact and what environmental damage that may have occurred from each one.
- 3. Detail what peatland restoration has been achieved in the damaged Annex 1 habitat and the plans for future peatland restoration.
- 4. Impacts on otter and other qualifying interests of the European sites of the substitute consent.
- 5. Actions and plans for peat and water management and siltation.
- 6. Outline the peat stability analysis that was carried out originally and any improvements on it. Was best practice used for peat stability analysis carried out for the original consent? Was ground-penetrating radar used and at what density? Would the sampling effort have impacted the results of the analysis?
- 7. Outline all plans to ensure future mitigation measures to avoid downstream impacts.
- 8. Include summary and results of all on-going ecological monitoring, including bird and bat surveys and freshwater monitoring since construction commenced.
- 9. Include detailed diagrams, illustration, maps and photographs to illustrate and clarify the text.
- 10. An assessment of peat soils in the site as a whole should be carried out and a carbon budget should be included to assess the implications of the proposed turbines and the opportunities that may exist for restoration of peatland soils to capture carbon for climate action.

Note that NPWS does not give advice on geotechnical issues and recommends that the planning authority obtain independent geotechnical advice. The Department does not have expertise on geotechnical stability analysis but is nonetheless concerned about the ecological implications of the analysis, and the impacts on protected habitats and species.



Please refer to previous scoping recommendations from the Department prior to original planning permission. These can be supplied if required.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at <u>referrals@npws.gov.ie</u>, where used, or to the following address:

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

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David O'Connor Development Applications Unit Administration

Planning Office Derry City and Strabane District Council 98 Strand Road Derry BT48 7NN



1st March 2024

To whom it may concern,

Application Reference: LA11/2024/0100/DETEIA Proposal: Meenbog Wind Farm Location: Meenbog (and surrounding townlands), Co. Donegal

The RSPB is Europe's largest voluntary nature conservation organisation and is supported by over 1 million members in the UK, around 11,000 of which reside in Northern Ireland (NI). As such we thank you for sending the above named consultation through to us for comment.

Due to limited capacity and high workload, we would refer back to our responses submitted in relation to the original application. These responses are attached with the 2017 scoping response (LA11/2016/1055/TBA) in Appendix A and the 2018 response to the full application (LA11/2017/1134/TBA) in Appendix B. We would advise the applicant to pay particualr attention to our comments in Appendix A which relate to peat.

Please do not hesitate to contact the Conservation Officer with any related queries.

Yours faithfully

Conservation Officer

RSPB Northern Ireland

RSPB Northern Ireland Headquarters Belvoir Park Forest Belfast BT8 7QT Tel: 028 9049 1547 Facebook: RSPBNI Twitter: @rspbni Instagram: rspb_ni rspb.org.uk



The RSPB is part of Birdlife International, a Partnership of conservation organisations working to give nature a home around the world.

Chair of Council: Kevin Cox President: Dr Amir Khan Chair, Committee for Northern Ireland: Judith Annett Director, RSPB Northern Ireland: Joanne Sherwood The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654 Registered address: The Lodge, Potton Road, Sandy, Bedfordshire, SG19 2DL