

1. INTRODUCTION

1.1 Introduction

This Remedial Environmental Impact Assessment Report (rEIAR) has been prepared by MKO on behalf of Planree Ltd, as part of an application for substitute consent for 25 deviations from the planning permission of the windfarm permitted by An Bord Pleanála (the Board) under ABP-300460-17 (amended by APB-303729-19).

This rEIAR is being prepared following an Order of the Board dated 16th October 2023 granting leave to apply for substitute consent for the said 25 deviations comprising the Subject Development (APB-314062-22)

The Subject Development is located at Meenbog and Croaghnoagh townlands, near the twin towns of Ballybofey and Stranolar, in Co. Donegal. MKO are the environmental and planning consultants for the Subject Development and have been commissioned to prepare this rEIAR to support the substitute consent application to the Board under Section 177E of the Planning and Development Act, 2000, as amended (“the Act”).

This rEIAR assesses the Subject Development, a full and detailed description of which is contained in Chapter 3 of this rEIAR.

Table 1-1 shows the townlands within which the Subject Development site is located. The Subject Development borders County Tyrone in Northern Ireland, specifically the townland of Termonamongan, in the administrative division of Omagh West.

Table 1-1 Townlands involved in the Subject Development

Townland
Meenbog
Croaghnoagh

1.2 The Applicant

The applicant for substitute consent for the Subject Development is Planree Ltd. Planree Ltd is an associated company of Enerco Energy Ltd., which is an Irish-owned, Cork-based company with extensive experience in the design, construction and operation of wind energy developments throughout Ireland, with projects currently operating or in construction in Counties Cork, Kerry, Limerick, Clare, Galway, Mayo and Donegal.

By Q1 2024 Enerco associated companies had over 875 Megawatts (MW) of wind generating capacity in commercial operation or in construction, with a further c.400MW of projects at various stages in its portfolio to assist in meeting Ireland’s renewable energy targets.

1.3 Brief Planning History

The Applicant, through MKO, sought leave to apply for substitute consent to the Board on 8th July 2022 for the Subject Development as per the provisions set out under Section 177C(2)(b) of the Act. (“the Leave Application”)

On 16th October 2023, the Board granted leave to apply for substitute consent to the Applicant under S177E of the Act) (“the Leave Order”). There is a requirement to prepare an rEIAR and a Remedial Natura Impact Statement (rNIS) to accompany the application for substitute consent. The Board requested that the application for substitute consent be lodged with the Board within a period of 12 weeks from the date of the Leave Order, in accordance with S177D of the Act. On 12th January 2024, the Board granted an extension of time for lodging the substitute consent application. The final date for making an application for substitute consent was extended to the 2nd of April, 2024. A detailed planning history of the Subject Development and the Meenbog Windfarm is provided in Chapter 2 of this rEIAR.

1.4 Brief Description of the Subject Development

The Subject Development comprises of 25 deviations from the windfarm permitted under ABP-300460-17 (amended by APB-303729-19).

The Subject Development relates to wind farm roads and hardstand areas, peat storage and containment measures, borrow pits, environmental and water quality mitigation measures, and ancillary works.

All elements of the Subject Development have been assessed as part of this rEIAR. A full and detailed description of the Subject Development is provided in Chapter 3 of this rEIAR.

1.4.1 References to Permitted Development, Subject Development, Meenbog Windfarm, and Site

The list below provides terminology used in this rEIAR.

- › **‘Site’**: refers to the primary rEIAR study area as shown in green in Figure 1-1.
- › **‘Permitted Development’**: means the permitted wind farm development including, wind turbine infrastructure, internal site roads and all supporting infrastructure, including the grid connection, which was granted permission by the Board under Planning Ref: ABP-300460-17 as amended by ABP-303729-19.
- › **‘Subject Development’**: means the 25 deviations from the Permitted Development as shown in Figure 1-2, for which substitute consent is being sought.
- › **‘Meenbog Windfarm’** means both the Permitted Development and the Subject Development combined.
- › **‘November 2020 Peatslide’**: means the peatslide or peat movement that occurred on 12th November 2020, during the construction of a permitted access road to turbine T7.

The primary study area of this rEIAR is approximately 903 hectares in extent and is located approximately 8km southwest of the twin towns of Ballybofey and Stranorlar and approximately 12km northeast of Donegal Town. Two of the 25 deviations are partly outside of the study area for the Permitted Development. The study areas of each individual topic being assessed, are identified in the relevant chapters of this rEIAR.

1.5 Need for the Subject Development

The Permitted Development is a large-scale civil engineering project that has been granted consent by the Board having been considered and permitted as a Strategic Infrastructure Development (SID) due to its nature, scale and characteristics. The 25 deviations that comprise the Subject Development are contiguous with the footprint of the Permitted Development. The Meenbog Windfarm as constructed to-date, including the subject 25 deviations, is consistent in terms of the nature, scale, and extent of impacts

to the environment as assessed in the EIAR and the NIS for the Permitted Development, and as assessed in the EIA and AA undertaken by the Board.

The deviations which comprise the Subject Development occur in similar habitats and locations to the previously assessed and permitted plans, do not change the nature or scale of the Permitted Development, and do not materially alter the environmental impacts associated with the Permitted Development.

The primary reason for the Subject Development relates to the need to often make deviations to the infrastructure as presented in the planning application drawings for a permitted development in response to actual conditions encountered on the ground, during the construction of such SID wind farm developments. In large-scale strategic infrastructure and civil engineering projects, some deviations from planning-stage designs are commonplace due to the greater level of detail required for the preparation of detailed engineering and construction designs prior to construction, or to adapt to ground conditions encountered on-site. A project design team may recommend and implement minor modifications in order to improve the safety and constructability of the development as and when circumstances, unforeseen at planning level, dictate. These circumstances often do not become apparent until construction has commenced.

The 25 deviations that comprise the Subject Development were identified during a review of the as-built development undertaken by Planree and Donegal County Council (DCC) post the occurrence of a peat slide event in November 2020 at the site of the Meenbog Windfarm. The application for Substitute Consent is being made in response to a request from DCC to regularise the planning status of the Subject Development.

A number of additional deviations were identified but for the reasons set out in section 5.3 of the Leave Application Planning report (Appendix 1-1), these additional deviations are deemed not to require substitute consent, for one or more of the following reasons.

- 1. What has been built on-site is different to what was permitted and shown on the original planning application drawings, only because what has been permitted, has not yet been constructed or completed.*
- 2. What has been built on-site is different to what was permitted and shown on the original planning application drawings, only because what has been built now occupies a smaller footprint than what was originally permitted.*
- 3. Elements of the permitted development have not been constructed/developed, and will not be constructed/developed, giving rise to a difference between what is on-site and what was permitted and shown on the original planning application drawings.*
- 4. Elements of the permitted development were identified as potential deviations, before being confirmed as having formed part of the original planning permission application and having the benefit of planning permission.*
- 5. Elements of the development were identified as potential deviations, even though they were temporary construction-related installations, such as storage containers or temporary site offices.*
- 6. An identified potential deviation was a pre-existing forestry road, and was not developed as part of the works to the permitted wind farm.*
- 7. Some identified potential deviations were emergency works undertaken in the period immediately after the peat failure, which have now been removed or reverted back to the permitted design/layout.*
- 8. "Tree movement" was identified as a potential deviation, but would not constitute works or development within the meaning of the Planning and Development Act for which substitute consent may be required.*

9. *Some potential deviations were enhanced water protection measures (as provided for in the EIAR's drainage design) in the form of additional silt ponds, check dams and roadside berms, and therefore integral to the protection of water quality during the construction of the permitted wind farm.*

The individual 22 potential deviations, which were part of the Planree and DCC/SLR consideration, but which do not form part of this application for leave to apply for substitute consent, are detailed in Appendix 1-1 of this report, together with whichever of the above reason(s) is/are the basis for the conclusion that substitute consent is not required.

1.6 Legislative Context

1.6.1 Environmental Impact Assessment

The consolidated European Union Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (the 'EIA Directive'), has been transposed into Irish planning legislation by the Planning and Development Act 2000 as amended and the Planning and Development Regulations 2001 as amended. Directive 2011/92/EU was amended by Directive 2014/52/EU which has been transposed into Irish law with the recent European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Most of the provisions of the new regulations came into operation on the 1st of September 2018 with a number of other provisions coming into operation on the 1st of January 2019.

This rEIAR complies with the EIA Directive as amended by Directive 2014/52/EU.

The remedial Environmental Impact Assessment (rEIA) of the Subject Development will be undertaken by the Board, as the competent authority.

Article 5 of the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU provides where an EIA is required, the developer shall prepare and submit an environmental impact assessment report (EIAR). The information to be provided by the developer shall include at least:

- a) a description of the project comprising information on the site, design, size and other relevant features of the project;
- b) a description of the likely significant effects of the project on the environment;
- c) a description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- d) 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;
- e) a non-technical summary of the information referred to in points (a) to (d); and
- f) any additional information specified in Annex IV relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected.

In addition, Article 94 of the Planning and Development Regulations 2001 (as amended) sets out the information to be contained in an EIAR, with which this rEIAR complies. The EIA Directive and associated guidance documents state that as well as considering any direct, indirect, secondary, transboundary, short-, medium-, and long-term, permanent and temporary, positive and negative effects of a development or project (all of which are considered in the various chapters of this rEIAR), the description of likely significant effects should include an assessment of cumulative impacts that may arise. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to a development or project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity (including birds), land, soil & geology, water, air, climate, material assets (including traffic and transportation), landscape and visual, cultural heritage and vulnerability to natural disasters, as well as the interactions between these factors.

1.6.2 EIAR Guidance

The Environmental Protection Agency (EPA) published its '*Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*' (EPA, 2022), which is intended to guide practitioners preparing an EIAR or rEIAR in line with the requirements set out in the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018).

In preparing this rEIAR regard has also been taken of the provisions of the '*Guidelines for Planning Authorities and An Bord Pleanála on Carrying out Environmental Impact Assessment*', published by the

Department of Housing, Planning and Local Government (DHPLG) in August 2018 to the extent these guidelines are relevant having regard to the enactment of the revised EIA Directive.

The Office of the Planning Regulator (OPR) Practice Note 01 - EIA Screening (June 2021) and the accompanying Template Screening form were considered as part of the preparation of this rEIA. The OPR Practice Note 02 - AA Screening for Development Management and the associated Template Screening form were considered during preparation of the rNIS.

The European Commission also published a number of guidance documents in December 2017 in relation to Environmental Impact Assessment of Projects (Directive 2011/92/EU as amended by 2014/52/EU) including ‘Guidance on Screening’, ‘Guidance on Scoping’ and ‘Guidance on the preparation of the Environmental Impact Assessment Report’. MKO has prepared this rEIA in accordance with these guidelines.

1.6.3 Substitute Consent

The provisions for Substitute Consent are contained primarily within the Planning and Development Act 2000 (as amended), (hereafter referenced as ‘the Act’). Pertinent amendments relating to substitute consent include those set out by Section 57 of the Planning and Development (Amendment) Act 2010, the Environmental (Miscellaneous Provisions) Act 2011, the European Union (EIA and Habitats) Regulations 2011, the European Union (EIA and Habitats) (No. 2) Regulations 2011, the European Union (Substitute Consent) Regulations 2011, the European Union (Environmental Impact Assessment and Habitats) Regulations 2015 (numbers 1 and 2), and the Planning and Development, Maritime and Valuation (Amendment) Act 2022, including those provisions which have come into effect since December 2023 through the Commencement of Certain Provisions (No. 2) Order (SI No. 645/2023).

Part XA of the Act refers to the legislative process for Substitute Consent, with Section 177C to 177G being of most relevance to this application for Substitute Consent for certain deviations at the Meenbog Wind Farm.

Section 177B of the Act relates to applications for Substitute Consent where notice is served by the Planning Authority directing the applicant to apply for substitute consent. While Planree received a letter from DCC suggesting that there were a number of deviations from the original planning permission that required regularisation, the letter was not a direction to apply for substitute consent within the meaning of Section 177B of the Act.

Section 177C of the Act relates to applications for Leave to Apply for Substitute Consent where notice is not served by the Planning Authority. This section includes:

“(1) A person who has carried out a development referred to in subsection (2), or the owner or occupier of the land as appropriate, to whom no notice has been given under section 177B, may apply to the Board for leave to apply for substitute consent in respect of the development.

(2) A development in relation to which an applicant may make an application referred to in subsection (1) is a development which has been carried out where an environmental impact assessment, a determination as to whether an environmental impact assessment is required, or an appropriate assessment, was or is required, and in respect of which— ...

a. the applicant is of the opinion that exceptional circumstances exist such that it may be appropriate to permit the regularisation of the development by permitting an application for substitute consent.

(3) An applicant for leave to apply for substitute consent under subsection (1) shall furnish the following to the Board:

a. any documents that he or she considers are relevant to support his or her application;
 ...

b. any additional information or documentation that may be requested by the Board, within the period specified in such a request.” (Our emphasis added)

Section 177D, which relates to decisions of the Board on whether to grant Leave to Apply for Substitute Consent provides that:

“(1) ...The Board shall only grant leave to apply for substitute consent in respect of an application under section 177C where it is satisfied that an environmental impact assessment, a determination as to whether an environmental impact assessment is required, or an appropriate assessment, was or is required in respect of the development concerned and where it is further satisfied— ...

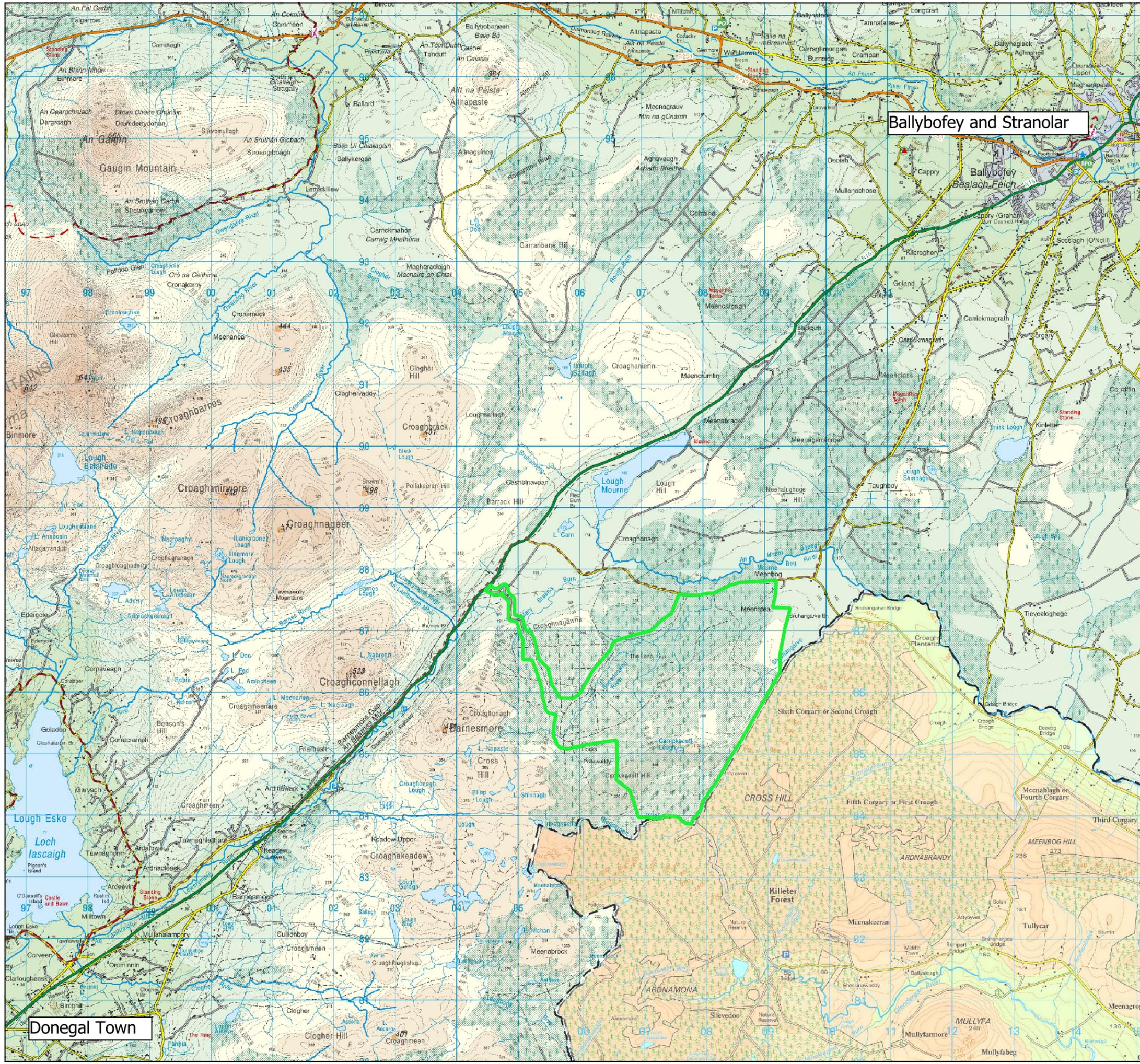
(b) that exceptional circumstances exist such that the Board considers it appropriate to permit the opportunity for regularisation of the development by permitting an application for substitute consent.”. (Our emphasis added)

Subsection 2 of this section 177D sets out the exceptional circumstances which the applicant for substitute consent must demonstrate have been satisfied. These are:

“(2) In considering whether exceptional circumstances exist the Board shall have regard to the following matters:

- a. whether regularisation of the development concerned would circumvent the purpose and objectives of the Environmental Impact Assessment Directive or the Habitats Directive;*
- b. whether the applicant had or could reasonably have had a belief that the development was not unauthorised;*
- c. whether the ability to carry out an assessment of the environmental impacts of the development for the purpose of an environmental impact assessment or an appropriate assessment and to provide for public participation in such an assessment has been substantially impaired;*
- d. the actual or likely significant effects on the environment or adverse effects on the integrity of a European site resulting from the carrying out or continuation of the development;*
- e. the extent to which significant effects on the environment or adverse effects on the integrity of a European site can be remediated;*
- f. whether the applicant has complied with previous planning permissions granted or has previously carried out an unauthorised development;*
- g. such other matters as the Board considers relevant”.*

An application for Leave to Apply for Substitute Consent was made to An Bord Pleanála in accordance with Section 177C(2)(b) of the Act on 8th July 2022, which demonstrated that the works carried out satisfied ‘exceptional circumstances’ and sought permission to prepare and lodge the subject application. The decision to grant Leave to Apply for Substitute Consent was made by An Bord Pleanála on 16th October 2023, and the subsequent grant of an extension of time period to lodge this application in accordance with Section 177E(4) was granted on 12th January 2024. Once exceptional circumstances are demonstrated, an application for Substitute Consent can be made in accordance with Section 177E of the Act.



Map Legend

 rEIAR Study Area

Ballybofey and Stranlar



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Drawing Title

Site Location

Project Title
Substitute Consent for Deviations at Meenbog Windfarm, Co. Donegal

Drawn By	Checked By
MT	TB

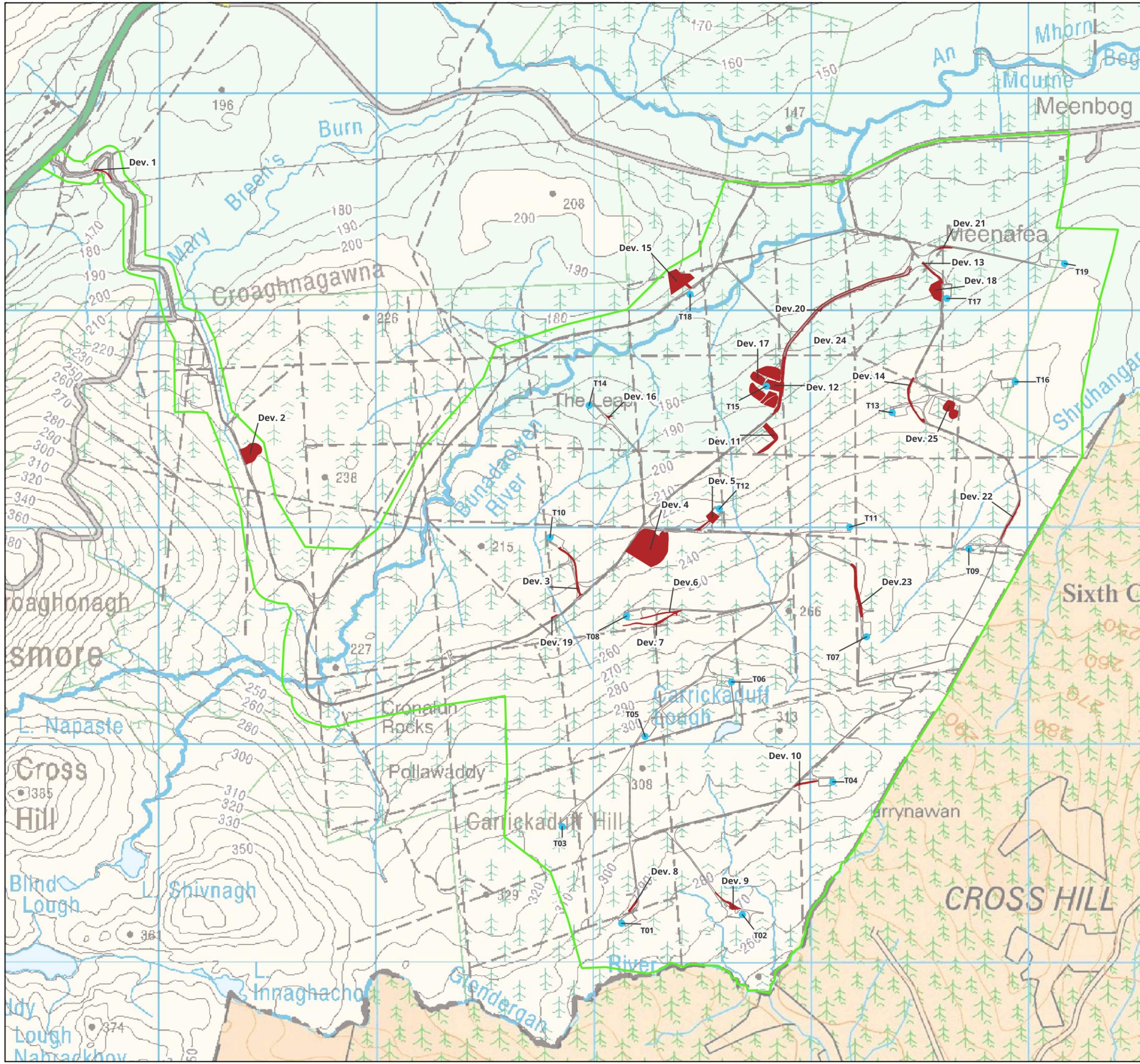
Project No.	Drawing No.
220623	Figure 1-1

Scale	Date
1:60,000	2024-03-04



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Donegal Town



Map Legend

- rEIA Study Area
- Subject Development Footprint
- Permitted Development Footprint
- Permitted Development Turbine Locations



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Drawing Title
Subject Development Layout

Project Title
Substitute Consent for Deviations at Meenbog Wind Farm, Co. Donegal

Drawn By MT	Checked By TB
Project No. 220623	Drawing No. Figure 1-2
Scale 1:17,000	Date 2024-03-29

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1.7

Purpose and Scope of the rEIAR

The purpose of this rEIAR prepared as part of the substitute consent application is to document the likely significant effects, if any, on the environment, which have occurred, or which are occurring, or which can reasonably be expected to occur because the Subject Development was carried out. To this end it includes an assessment of all phases of the Subject Development - construction, operational and decommissioning.

This rEIAR also contains information regarding the Subject Development, the likely significant effect of the Subject Development, the baseline scenario, the reasonable alternatives considered by the developer, the features and measures that were in place to mitigate potential adverse significant effects as well as a Non-Technical Summary and any additional information specified in Annex IV of the EIA Directive.

The Subject Development and the Permitted Development have been cumulatively assessed as part of this rEIAR. The Subject Development has also been cumulatively assessed with the works carried out to mitigate the effects of the Peat Slide and other relevant projects as described in Chapter 2. The Board has granted leave to apply for substitute consent for the Subject Development. Therefore, the purpose of this rEIAR is to assess the environmental effects of the Subject Development for the substitute consent process.

The rEIAR provides the relevant environmental information to enable the rEIA to be carried out by the Board. The information to be contained in the rEIAR is prescribed Article 5 of the revised EIA Directive described in Section 1.8 below.

1.8

Structure and Content of the rEIAR

1.8.1

General Structure

This rEIAR uses the grouped structure method to describe the existing environment, the potential impacts of the Subject Development thereon and the mitigation measures. Background information relating to the Subject Development, scoping and consultation undertaken and a description of the Subject Development are presented in separate sections. The grouped format sections describe the impacts of the Subject Development in terms of population and human health, biodiversity (including ornithology), soils and geology, hydrology and hydrogeology, air and climate, noise and vibration, landscape and visual, cultural heritage, material assets such as traffic and transportation and Vulnerability of the Project to Major Accidents and Natural Disasters, together with the interaction of the foregoing and a schedule of Mitigation and Monitoring Measures.

The chapters of this rEIAR are as follows:

- 1. Introduction*
- 2. Background to the Subject Development and Reasonable Alternatives Considered*
- 3. Description of the Subject Development*
- 4. Population and Human Health*
- 5. Biodiversity - Flora and Fauna, including Ornithology*
- 6. Land, Soils and Geology*
- 7. Hydrology and Hydrogeology*
- 8. Air and Climate*
- 9. Noise and Vibration*
- 10. Cultural Heritage*
- 11. Landscape and Visual*
- 12. Material Assets*
- 13. Vulnerability of the Project to Major Accidents and Natural Disasters*
- 14. Interaction of the Foregoing*
- 15. Schedule of Mitigation and Monitoring Measures*

The rEIAR also includes a Non-Technical Summary, which is a condensed and easily comprehensible version of the rEIAR document. The non-technical summary is laid out in a similar format to the main

rEIA document and comprises a description of the Subject Development followed by the existing environment, impacts and mitigation measures presented in the grouped format.

1.8.2 Description of Likely Significant Effects and Impacts

As stated in the ‘Guidelines on the Information to be Contained in Environmental Impact Assessment Reports’ (EPA, May 2022), an assessment of the likely impacts of a development is a statutory requirement of the EIA process. The statutory criteria for the presentation of the characteristics of potential impacts requires that potential significant impacts are described with reference to the extent, magnitude, complexity, probability, duration, frequency, reversibility and trans-boundary nature (if applicable) of the impact.

The classification of impacts in this rEIA follows the definitions provided in the Glossary of Impacts contained in the EPA 2022 Guidelines document.

The European Commission published a number of guidance documents in December 2017 in relation to Environmental Impact Assessment of Projects (Directive 2011/92/EU as amended by 2014/52/EU) including ‘Guidance on Screening’, ‘Guidance on Scoping’ and ‘Guidance on the preparation of the Environmental Impact Assessment Report’, which have also been consulted.

Table 1-2 presents the glossary of impacts as published in the EPA guidance documents (EPA, 2022). Standard definitions are provided in this glossary, which permit the evaluation and classification of the quality, significance, duration and type of impacts associated with the Subject Development on the receiving environment. The use of pre-existing standardised terms for the classification of impacts ensures that the rEIA employs a systematic approach, which can be replicated across all disciplines covered in this rEIA. The consistent application of terminology throughout this rEIA facilitates the assessment of the Subject Development on the receiving environment.

Table 1-2 Impact Classification Terminology (EPA, 2022)

Impact Characteristic	Term	Description
Quality	Positive	A change which improves the quality of the environment
	Neutral	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.
	Negative	A change which reduces the quality of the environment
Significance	Imperceptible	An effect capable of measurement but without significant consequences
	Not significant	An effect which causes noticeable changes in the character of the environment but without significant consequences.
	Slight	An effect which causes noticeable changes in the

Impact Characteristic	Term	Description
		character of the environment without affecting its sensitivities
	Moderate	An effect that alters the character of the environment in a manner consistent with existing and emerging baseline trends
	Significant	An effect, which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment
	Very significant	An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment
	Profound	An effect which obliterates sensitive characteristics
Extent & Context	Extent	Describe the size of the area, number of sites and the proportion of a population affected by an effect
	Context	Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions
Probability	Likely	Effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented
	Unlikely	Effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented.
Duration and Frequency	Momentary	Effects lasting from seconds to minutes

Impact Characteristic	Term	Description
	Brief	Effects lasting less than a day
	Temporary	Effects lasting less than a year
	Short-term	Effects lasting one to seven years
	Medium-term	Effects lasting seven to fifteen years
	Long-term	Effects lasting fifteen to sixty years
	Permanent	Effect lasting over sixty years
	Reversible	Effects that can be undone, for example through remediation or restoration
	Frequency	Describe how often the effect will occur. (once, rarely, occasionally, frequently, constantly - or hourly, daily, weekly, monthly, annually)
Type	Indirect	Impacts on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway
	Cumulative	The addition of many minor or significant effects, including effects of other projects, to create larger, more significant effects.
	'Do Nothing'	The environment as it would be in the future should the subject project not be carried out
	'Worst Case'	The effects arising from a project in the case where mitigation measures substantially fail
	Indeterminable	When the full consequences of a change in the environment cannot be described
	Irreversible	When the character, distinctiveness, diversity, or reproductive capacity of an environment is permanently lost

Impact Characteristic	Term	Description
	Residual	Degree of environmental change that will occur after the proposed mitigation measures have taken effect
	Synergistic	Where the resultant effect is of greater significance than the sum of its constituents

Each impact is described in terms of its quality, significance, duration and type, where possible. A ‘Do-Nothing’ impact is also predicted in respect of each environmental theme in the rEIAR. Residual impacts are also presented following any impact for which mitigation measures are prescribed. The remaining impact types are presented as required or applicable throughout the rEIAR. Any potential interactions between the various aspects of the environment assessed throughout this rEIAR are presented in Chapter 14: Interactions of the Foregoing.

1.9 Project Team

1.9.1 Project Team Responsibilities

The companies and staff listed in Table 1-3 were responsible for completion of this rEIAR for the Subject Development. Further details regarding project team members are provided below.

The rEIAR project team comprises a multidisciplinary team of experts with extensive experience in the assessment of wind energy developments and in their relevant area of expertise. The qualifications and experience of the principal staff from each company involved in the preparation of this rEIAR are summarised in Section 1.9.2 below. Each chapter of this rEIAR has been prepared by a competent expert in the subject matter.

Table 1-3 rEIAR Project Team

Consultants		EIAR Input
MKO	Environment: Brian Keville, Michael Watson; Eoin O’Sullivan, Thomas Blackwell, Malena Thren; Jack Workman, Saoirse Fitzsimmons; Ellen Costello, Catherine Johnson	Substitute Consent application preparation, rEIAR co-ordinators; Scoping and Consultation; Preparation of rEIAR Sections: <ul style="list-style-type: none"> > Chapter 1: Introduction > Chapter 2: Background to the Subject Development > Chapter 2a: Site Selection and Alternatives > Chapter 3: Description of the Subject Development > Chapter 4: Population and Human Health > Chapter 5: Biodiversity - Flora and Fauna, including ornithology > Chapter 8: Air and Climate > Chapter 11: Landscape and Visual > Chapter 12: Material Assets > Chapter 13: Vulnerability of the Project to Major Accidents and Natural Disasters
	Ecology: John Hynes, Pat Roberts, Colin Murphy; Rachel Minoque	

Consultants		EIAR Input
	Planning: Colm Ryan, Meabhann Crowe, Aine Bourke, Meabh Cleary	<ul style="list-style-type: none"> > Chapter 14: Interaction of the Foregoing > Chapter 15: Schedule of Mitigation and Monitoring Measures
Hydro-Environmental Services Ltd.	Michael Gill, Conor McGettigan, John Twomey	<ul style="list-style-type: none"> > Chapter 6: Land, Soils and Geology > Chapter 7: Hydrology and Hydrogeology
AWN Consulting	Dermot Blunnie Alistair Maclaurin	<ul style="list-style-type: none"> > Chapter 9: Noise and Vibration
Tobar Archaeological Services (TBC)	Miriam Carrol	<ul style="list-style-type: none"> > Chapter 10: Cultural Heritage
Alan Lipscombe Traffic and Transport Consultants	Alan Lipscombe	<ul style="list-style-type: none"> > Chapter 12 Material Assets (Traffic and Transport)

1.9.2 Project Team Members

1.9.2.1 MKO

Brian Keville

Brian has over 20 years’ professional experience as an environmental consultant having graduated from the National University of Ireland, Galway with a first class honours degree in Environmental Science. Brian’s professional experience has focused on project and environmental management, and environmental impact assessments. Brian has acted as project manager and lead-consultant on numerous environmental impact assessments, across various Irish counties and planning authority areas. These projects have included large infrastructural projects such as roads, ports and municipal services projects, through to commercial, mixed-use, industrial and renewable energy projects. The majority of this work has required liaison and co-ordination with government agencies and bodies, technical project teams, sub-consultants and clients.

Michael Watson BA. MA. CEnv. PGeo

Michael Watson is a Director of Environment in MKO. Michael has over 20 years’ experience in the environmental sector. Following the completion of his master’s degree in environmental resource management, Geography, from National University of Ireland, Maynooth he worked for the Geological Survey of Ireland and then a prominent private environmental & hydrogeological consultancy prior to joining MKO in 2014. Michael’s professional experience includes managing Environmental Impact Assessments, EPA License applications, hydrogeological assessments, environmental due diligence and general environmental assessment on behalf of clients in the wind farm, waste management, public sector, commercial and industrial sectors nationally. Michael’s key strengths include project strategy advice for a wide range and scale of projects, project management and liaising with the relevant local authorities, Environmental Protection Agency (EPA) and statutory consultees as well as coordinating the project teams and sub-contractors. Michael is a key member of the MKO senior management team and as head of the Environment Team has responsibilities to mentor various grades of team members, foster a positive and promote continuous professional development for employees. Michael also has a Bachelor

of Arts Degree in Geography and Economics from NUI Maynooth, is a Member of IEMA, a Chartered Environmentalist (CEnv) and Professional Geologist (PGeo).

Eoin O'Sullivan M.Sc B.Sc

Eoin O'Sullivan is a Project Director at MKO with over 15 years of experience in the assessment of a wide range of energy and infrastructure related projects and working in the fields of environmental and human health risk assessment, waste management, waste policy and permitting. Eoin has wide experience in the project management of large scale infrastructural projects and brownfield developments which includes all aspects of geo-environmental and geotechnical investigation. Eoin holds a BSc (Hons) in Environmental Science & Technology and a MSc in Environmental Engineering. Prior to taking up his position with MKO in July 2017, Eoin worked as a Chartered Senior Engineer with CGL in Surrey, UK. Prior to this Eoin worked as a Project Engineer with RPS Consulting Engineers in Belfast. Eoin has wide experience in the project management of large scale brownfield developments and has routinely undertaken detailed quantitative risk assessment for the protection of controlled waters and ground gas risk assessments. Eoin has also experience in completing Environmental Impact Assessment Reports for renewable energy projects, quarries and a number of non-hazardous landfill sites and anaerobic digesters for both public and private clients. Eoin's key strengths include project strategy advice for a wide range and scale of projects, project management and liaising with the relevant local authorities, Environmental Protection Agency (EPA) and statutory consultees as well as coordinating the project teams and sub-contractors. Eoin is a Chartered Member of the Chartered Institute of Water and Environmental Management and Chartered Environmentalist with the Society of Environment.

Thomas Blackwell BA MSc

Thomas is a Senior Environmental Consultant with over 18 years of progressive experience in environmental consulting. Thomas' professional experience includes managing Environmental Impact Assessments, environmental permitting, environmental due diligence and compliance, and general environmental assessment on behalf of clients in the renewable energy, mining, solid waste management, residential and commercial development, and public sectors. Thomas also has extensive experience in environmental and ecosystem restoration design, project management, and construction oversight. Thomas' multi-sector experience working on projects in multiple jurisdictions has allowed him to develop a wealth of knowledge and understanding of the challenges involved in guiding complex project through the regulatory and planning process.

Ellen Costello

Ellen is a Project Environmental Scientist and Climate Practitioner with over four years of consultancy experience with MKO and has been involved in a range of projects including climate and sustainability context reports for masterplans and commercial developments, renewable energy infrastructure projects, and the compilation of numerous chapters including the preparation of climate assessments for Environmental Impact Assessment Reports. Ellen holds a BSc. in Earth Science and a MSc. in Climate Change: Integrated Environmental and Social Science Aspects where she focused her studies on climate adaptation and mitigation, and its implications on environment and society.

Catherine Johnson

Catherine is an Environmental Scientist and Climate Practitioner at MKO with over one year of consultancy experience in climate and sustainability. Prior to joining MKO in 2022, Catherine worked as an Environmental Social Governance (ESG) analyst for Acasta in Edinburgh. Catherine has expertise in internal climate law and policy, earth science, and sustainability/ESG processes. Catherine has a BSc in Earth and Ocean Science and an LLM in Global Environment and Climate Change Law.

Malena Thren

Malena Thren is a Graduate Environmental Scientist with MKO. Malena holds a first-class Honours in BSc (Hons) Environmental Science from NUI Galway (2023). Prior to taking up her position with MKO

in September 2023, she worked with the university and local authorities on a variety of award-winning environmental campaigns as Students' Union Officer and Sustainability Leadership Intern. Her key strengths and expertise are in report writing, research and communication and she is experienced in data analysis and QGIS mapping. Since joining MKO, Malena has been involved in the preparation of Environmental Impact Assessment Screening and Scoping Reports, License Monitoring, Project Management, Construction Management Plans, Environmental Impact Assessment Reports, Research projects and Environmental Reports.

Jack Workman

Jack Workman is chartered as a Technician Member with the British Landscape Institute (TMLI) and he is the Landscape & Visual Project Director at MKO. Jack is an Environmental Scientist and Landscape and Visual Impact Assessment (LVIA) specialist. Since starting at MKO, Jack's primary role at MKO has been producing the Landscape and Visual chapter of EIA reports for large scale infrastructure developments. Jack holds an MSc. in Coastal and Marine Environments and a BSc. in Psychology, he is a member of the Landscape Research Group, as well as holding a membership with the Chartered Institute of Water and Environmental Management.

Saoirse Fitzsimons

Saoirse Fitzsimons is an Environmental Scientist and LVIA Specialist with MKO. She is an affiliate member of the British Landscape Institute. Her primary role at MKO is producing the LVIA chapter of EIAR reports. Saoirse holds an MSc. in Coastal and Marine Environments from the National University of Ireland, Galway where she was awarded The Prof Micheál O Cinnéide Award for Academic Excellence. Since joining MKO, Saoirse has worked widely on renewable energy infrastructure, commercial, recreational, and residential projects. Saoirse is an IAA qualified Unmanned Aerial Vehicle Operator and holds an A1/A3 and A2 drone licence.

Colm Ryan

Colm Ryan is a Director of Planning with McCarthy O'Sullivan Ltd. with over 12 years of experience in both private practice and local authorities. Colm holds BA (Hons) in Geography & Irish and Masters in Civic Design Town & Regional Planning. Prior to taking up his position with McCarthy Keville O'Sullivan in May 2017, Colm worked as a Senior Planner with Lightsource Renewable Energy Ltd. and held previous posts with Partnerships for Renewables, South Kesteven District Council, Planning Aid, Frank O Gallachoir & Associates in Bray and Laois County Council. Colm is a chartered town planner with specialist knowledge in renewable energy, mixed use development and residential. Colm's key strengths and areas of expertise are in large scale renewable energy development particularly in the ground mounted solar, delivery of local community engagement processes on contentious planning applications, management of community and developers interest through the planning process and post or pre-planning due diligence. Since joining MKO as a Senior Planner Colm has been overseeing and managing a wide range of development projects such as large scale solar applications, site feasibility work for potential wind energy projects, large scale housing and mixed use schemes. Within MKO Colm plays a large role in the management of staff members including several aspects of business development. Colm has proven negotiation skills and stakeholder relationship building across numerous development projects in Ireland and the UK and is a corporate member of the Irish Planning Institute.

Meabhann Crowe

Meabhann Crowe is a Senior Planner with McCarthy O'Sullivan Ltd with over 15 years private sector experience. She is a fully chartered member of the Royal Town Planning Institute (MRTPI). Meabhann holds a BA (Hons) in Geography, Sociological and Political Science and a Masters in Urban and Regional Planning. Prior to taking up her position with McCarthy Keville O'Sullivan in October 2018, Meabhann was employed as an Associate Director with Colliers International in their Edinburgh office, prior to which she was employed for several years with Halliday Fraser Munro. In her time in the industry Meabhann has been active on a number of instructions across a broad spectrum of mixed-use, residential, commercial, renewable energy and retail projects.

Meabhann brings particular expertise in initial development feasibility appraisals and development strategies. Her experience in managing large multi-disciplinary teams in the preparation of local and major planning applications across residential, mixed-use and retail developments means she has a wealth of knowledge to draw on in the early stages of development. She has particular experience in preparing and managing project strategies which include both responding to emerging planning policy whilst also preparing and progressing complex planning applications and appeals.

Aine Bourke

Áine Bourke is a Project Planner with MKO with 6 years of experience as a planner in private practice. Áine holds BA (Major) in Geography & English and master's in planning and Sustainable Development (MPlan). Prior to taking up her position with MKO in May 2020, Áine worked as a Planner in the UK with Vail Williams LLP, where she gained experience as a graduate through to planner level following the successful completion of her Assessment of Professional Competence (APC) and promotion to Chartered Member of the Royal Town Planning Institute. Áine held previous positions as a clerical officer at Cork City Council, assisting the Planning Department with field research, and as a student intern with Tipperary County Council. Áine is a chartered town planner with experience across a range of sectors including commercial, residential, healthcare, tourism and industrial, as well as having experience with providing development advice and appraisals to clients, conducting strategic land searches, submitting planning applications for residential, commercial, tourism and health sector clients, along with providing strategic planning advice, preparing planning appeals, attending client meetings and conducting site visits. Áine's key strengths and areas of expertise are in development management, provision of planning advice and project management of small and medium sized projects. Since joining MKO Áine has been working alongside with the wider planning team, working on various projects including Strategic Housing Developments, providing planning advice, lodgement and management of a range of Planning Applications, preparing Development Plan submissions and preparing Development Potential Reports. Áine holds chartered membership with the Royal Town Planning Institute and chartered membership with the Irish Planning Institute.

Meabh Cleary

Méabh is Planner with MKO, with almost 4 years of experience working within the private sector. Méabh holds a BSc in Planning, Environment and Development, as well as an MSc in City Planning and Design, both from Queen's University Belfast. Prior to taking up her position with MKO in May 2023, Méabh worked as an Assistant Project Manager with Arup, working on a variety of projects from technical due diligence assessments to large scale development projects. Méabh's key strengths and area of expertise are in project management, policy analysis, and technical reporting. Since joining MKO, Méabh has been involved as a Planner on a range of residential, commercial, educational, and regeneration projects. Méabh is a licentiate member of the Royal Town Planning Institute and holds the PRINCE2 Practitioner level qualification in Project Management.

John Hynes M.Sc. (Ecology), B.Sc.

John Hynes is an Ecology Director with MKO with over 10 years of experience in both private practice and local authorities. John holds a B.Sc in Environmental Science and a M.Sc. in Applied Ecology. Prior to taking up his position with MKO in March 2014, John worked as an Ecologist with Ryan Hanley Consulting Ltd. and Galway County Council. John has specialist knowledge in Flora and Fauna field surveys, Geographic Information Systems, data analysis, Appropriate Assessment, Ecological Impact Assessment and Environmental Impact Assessment. John's key strengths and areas of expertise are in project management, GIS and impact assessment. Since joining MKO John has been involved as a Senior Ecologist on a significant range of energy infrastructure, commercial, national roads and private/public development projects. Within MKO John plays a large role in the management and confidence building of junior members of staff and works as part of a large multi-disciplinary team to produce EIAR Reports. John has project managed a range of strategy and development projects across Ireland and holds CIEEM membership.

Pat Roberts B.Sc. (Env.)

Pat Roberts is Principal Ecologist with MKO with over 18 years post graduate experience of providing ecological services in relation to a wide range of developments at the planning, construction and monitoring stages. Pat holds B.Sc. (Hons) in Environmental Science. Pat has extensive experience of providing ecological consultancy on large scale industrial and civil engineering projects. He is highly experienced in the completion of ecological baseline surveys and impact assessment at the planning stage. He has worked closely with construction personnel at the set-up stage of numerous construction sites to implement and monitor any prescribed best practice measures. He has designed numerous Environmental Operating Plans and prepared many environmental method statements in close conjunction with project teams and contractors. He has worked extensively on the identification, control and management of invasive species on numerous construction sites. Prior to taking up his position with MKO in June 2005, Pat worked in Ireland, USA and UK as a Tree Surgeon and as a nature conservation warden with the National Trust (UK) and the US National Park Service. Pat's key strengths include his depth of knowledge and experience of a wide range of ecological and biodiversity topics and also in his ability to understand the requirements of the client in a wide range of situations. He is currently responsible for staff development, training and ensuring that the outputs from the ecology team are of a very high standard and meet the requirements of the clients and relevant legislation and guidelines. He is a full member of the Chartered Institute of Ecologists and Environmental Managers (CIEEM)

Colin Murphy

Colin Murphy is a Project Ecologist with over three years of experience in private consultancy. Colin holds a B.Sc (Hons) in Ecology and Environmental Biology from University College Cork and a M.Sc in Ecosystem Science and Policy from University College Dublin. He has experience in producing Habitats Directive Assessments, Ecological Impacts Assessment Reports (EcIA), Biodiversity Net Gain Assessments and preparing Biodiversity Chapters in Environmental Impact Assessment Reports (EIAR) for a variety of wind farm planning applications, as well as commercial, residential and infrastructure projects. Colin's key strengths and expertise are Ecological Constraints identification, Ecological Impact Assessment, Habitats Directive Assessment, Project Management and GIS Mapping. Colin has extensive experience in conducting a wide range of ecological surveys including habitat surveys, invasive species surveys, bat surveys, winter wildfowl and waders' surveys and protected species surveys (marsh fritillary, otter and badger). Colin is also experienced in providing Ecological Clerk of Work (EcOW) and site supervision on a wide variety of project, including residential and commercial construction projects and wastewater treatment plant upgrade works.

Colin is currently managing a team of three junior ecologists and main tasks include organizing team workload, reviewing outputs and liaising with clients.

Rachel Minogue

Rachel is a Practitioner Ecologist with MKO, since October 2022 with over one year of experience in professional ecological consultancy. Rachel holds a first-class BSc (Hons) in Environmental Science from National University of Ireland, Galway. Rachel's key strengths and areas of expertise are in the areas of reporting, including Appropriate Assessment Screening Reports (AASR), Ecological Impact Assessments (EcIA) and Natura Impact Statements (NIS), terrestrial flora and fauna ecology, including detailed vegetation surveys, habitat classification, Annex I habitat classification, GIS habitat mapping, mammal surveys, breeding and wintering bird surveys, marsh fritillary surveys, bat surveys and roost site potential assessment. Since joining MKO Rachel has worked widely on energy infrastructure (including windfarms), commercial, recreational, and residential projects and plays a role preparing Ecological Impact Assessment reports (EcIA), Natura Impact Statements (NIS) and Appropriate Assessment reports (AASR). Rachel is trained in carrying out bat surveys, wintering and breeding bird surveys, terrestrial invertebrate surveys, mammal surveys, and in taking vegetation relevés of vascular plants. She also has experience in habitat identification using Fossitt, and ERICA and habitat mapping using QGIS. Within MKO Rachel is responsible for independently carrying out and planning ecological field surveys in accordance with NRA Guidelines, and for carrying out bat surveys in accordance with Scottish Natural Heritage 2019 Guideline standards, habitat surveys, and Appropriate Assessment screenings as part of the

ecology team. Rachel is a member of CIEEM (QCIEEM membership) and holds a current Bat Roost Disturbance licence.

Joseph O'Brien

Joseph O'Brien holds the position of CAD Technician. Joseph holds a BA Honours Level 8 Modelmaking, Design and Digital Effect, Institute of Art Design and Technology (IADT), Dun Laoghaire & City & Guilds Level 3 2D & 3D AutoCAD certificates. Joseph's role entails various wind and solar farm projects which require various skills such as mapping, aerial registration and detailed design drawings for projects. Prior to joining us, Joseph worked as a free-lance Modelmaker and CAD Technician. His previous experience included designing various models and props through CAD and then making them for various conventions such as Dublin Comic Con and Arcade Con.

1.9.2.2 **AWN Consulting**

Dermot Blunnie

Dermot Blunnie (Senior Acoustic Consultant) holds a BEng in Sound Engineering, MSc in Applied Acoustics and has completed the Institute of Acoustics (IOA) Diploma in Acoustics and Noise Control. He has been working in the field of acoustics since 2008 and is a member of the Institute of Engineers Ireland (MIEI) and the Institute of Acoustics (MIOA). He has extensive knowledge of all aspects of environmental surveying, noise modelling and impact assessment for various sectors including, energy, industrial, commercial and residential. Dermot specialises in wind farm noise modelling, compliance and complaint investigations.

Alistair Maclaurin

Alistair Maclaurin (Senior Acoustic Consultant) holds a BSc in Creative Music and Sound Technology and a Diploma in Acoustics and Noise Control. He is a member of the Institute of Acoustics. Alistair has worked in the field of acoustics since 2012. He has been the lead noise consultant across various sites on major infrastructure projects such as Crossrail and Thames Tideway Tunnel, specialising in construction noise assessment and control. Additionally, he has undertaken various other environmental noise assessments for infrastructure developments and planning reports across the UK and Ireland.

1.9.2.3 **Hydro Environmental Services Ltd**

Michael Gill

Michael Gill (BA, BAI, Dip Geol., MSc, MIED) is an Environmental Engineer and Hydrogeologist with over 22 years' environmental consultancy experience in Ireland. Michael has completed numerous geological, hydrological and hydrogeological impact assessments of wind farms and renewable projects in Ireland. For example, Michael has worked on the EIARs for Oweninny WF, Cloncreen WF, and Yellow River WF, and over 120 other wind farm related projects across the country.

Conor McGettigan

Conor McGettigan (BSc, MSc) is an Environmental Scientist with over 3 years' experience in the environmental sector in Ireland. Conor holds an M.Sc. in Applied Environmental Science (2020) and a B.Sc. in Geology (2016) from University College Dublin. Conor routinely prepares the land, soils and geology chapters of environmental impact assessment reports for wind farm development on peatlands.

John Twomey

John Twomey (BSc) is a recent graduate of Earth and Ocean Science from UG. John has assisted with the completion of geological impact assessments for a range of developments including quarries, windfarms and industrial developments.

1.9.2.4 Tobar Archaeological Services

Miriam Carrol

Tobar Archaeological Services is a Cork-based company in its 17th year in business. They offer professional nationwide services ranging from pre-planning assessments to archaeological excavation, and cater for clients in state agencies, private and public sectors. Tobar's Director, Miriam Carroll, is licensed by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs to carry out excavations in Ireland and has carried out work directly for the National Monuments Services of the Department of the Environment, Heritage and Local Government. Tobar Archaeological Services has a proven track record and extensive experience in the wind farm industry from EIS/EIAR stage through to construction stage when archaeological monitoring is frequently required. Miriam holds a Degree in Archaeology (1993-1996) and a 2-year Masters in Methods and Techniques in Irish Archaeology (1996-1998) from UCC and has over 20 years' experience in private sector archaeology. Miriam has managed and co-ordinated numerous projects from commencement stage to completion on behalf of numerous small and large companies.

1.9.2.5 Alan Lipscombe Traffic and Transport Consultants

Alan Lipscombe

Alan is a competent expert in traffic and transport assessments. In 2007 Alan set up a traffic and transportation consultancy providing advice for a range of clients in the private and public sectors. Prior to this Alan was a founding member of Colin Buchanan's Galway office having moved there as the Senior Transportation Engineer for the Galway Land Use and Transportation Study. Since the completion of that study in 1999, Alan has worked throughout the West of Ireland on a range of projects including: major development schemes, the Galway City Outer Bypass, Limerick Planning Land-Use and Transportation Study, Limerick Southern Ring Road Phase II, cost benefit analyses (COBA) and various studies for the NUI Galway. Before moving to Galway in 1997, Alan was involved in a wide variety of traffic and transport studies for CBP throughout the UK, Malta and Indonesia. He has particular expertise in the assessment of development related traffic and transport modelling.

1.10 Difficulties Encountered

There were no technical difficulties encountered during the preparation of this rEIAR.

1.11 Viewing and Purchasing of the rEIAR

Copies of this rEIAR will be available online for the substitute consent application, including the Non-Technical Summary (NTS), on the Planning Section of the Board website, under the relevant Planning Reference Number (to be assigned on lodgement of the application).

An Bord Pleanála: <http://www.pleanala.ie/>

This rEIAR and all associated documentation will also be available for viewing at the offices of the Board, and Donegal County Council. The rEIAR may be inspected free of charge or purchased by any member of the public during normal office hours at the following address:

An Bord Pleanála,
64 Marlborough Street,
St. Rotunda,
Dublin 1

Donegal County Council,
County House,
The Diamond,
Lifford,
Co. Donegal



The rEIAR will also be available to view online via the Department of Planning, Housing and Local Government's EIA Portal, which will provide a link to the planning authority's website on which the application details are contained. This EIA Portal was recently set up by the Department as an electronic notification to the public of requests for development consent which are accompanied by an EIAR or rEIAR.

<https://www.housing.gov.ie/planning/environmental-assessment/environmental-impact-assessment-eia/eia-portal>