



## **APPENDIX 9-2**

**REVISED WFD  
COMPLIANCE REPORT**

**WATER FRAMEWORK DIRECTIVE ASSESSMENT  
UMMA MORE RENEWABLE ENERGY DEVELOPMENT, CO. WESTMEATH**

**FINAL REPORT**

Prepared for:  
Umma More Ltd

Prepared by:  
**HYDRO-ENVIRONMENTAL SERVICES**

## DOCUMENT INFORMATION

<b>Document Title:</b>	WATER FRAMEWORK DIRECTIVE ASSESSMENT UMMA RENEWABLE ENERGY DEVELOPMENT, CO. WESTMEATH
<b>Issue Date:</b>	10 <sup>th</sup> June 2025
<b>Project Number:</b>	P1553-2
<b>Project Reporting History:</b>	P1553-2
<b>current revision no:</b>	P1553-2_WFD_FINAL_F0
<b>Author:</b>	MICHAEL GILL CONOR MCGETTIGAN NITESH DALAL
<b>Signed:</b>	 <hr/> Michael Gill B.A., B.A.I., M.Sc., MIEI Managing Director – Hydro-Environmental Services
<p><b>Disclaimer:</b>  This report has been prepared by HES with all reasonable skill, care and diligence within the terms of the contract with the client, incorporating our terms and conditions and taking account of the resources devoted to it by agreement with the client. We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above. This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies upon the report at their own risk.</p>	

## TABLE OF CONTENTS

<b>1. INTRODUCTION .....</b>	<b>5</b>
1.1 BACKGROUND .....	5
1.2 STATEMENT OF AUTHORITY .....	5
1.3 WATER FRAMEWORK DIRECTIVE .....	6
<b>2. WATERBODY IDENTIFICATION &amp; CLASSIFICATION .....</b>	<b>7</b>
2.1 INTRODUCTION .....	7
2.2 SURFACE WATERBODY IDENTIFICATION.....	7
2.3 SURFACE WATER BODY CLASSIFICATION .....	9
2.4 GROUNDWATER BODY IDENTIFICATION .....	12
2.5 GROUNDWATER BODY CLASSIFICATION.....	12
2.6 ZONE OF INFLUENCE.....	12
2.7 PROTECTED AREA IDENTIFICATION.....	13
2.7.1 Nature Conservation Designations .....	13
2.7.2 Bathing Waters .....	14
2.7.3 Nutrient Sensitive Areas .....	14
2.7.4 Shellfish Waters .....	14
2.7.5 Salmonid Waters .....	14
2.7.6 Drinking Water .....	15
<b>3. WFD SCREENING .....</b>	<b>16</b>
3.1 WIND FARM SITE .....	16
3.2 GRID CONNECTION.....	16
3.3 SURFACE WATER BODIES .....	16
3.4 GROUNDWATER BODIES .....	17
3.5 PROTECTED AREAS.....	17
3.6 WFD SCREENING SUMMARY .....	17
<b>4. WFD COMPLIANCE ASSESSMENT.....</b>	<b>24</b>
4.1 DEVELOPMENT PROPOSAL.....	24
4.2 POTENTIAL EFFECTS .....	24
4.2.1 Construction Phase (Unmitigated) .....	24
4.2.2 Operational Phase (Unmitigated).....	28
4.3 MITIGATION MEASURES .....	30
4.3.1 Construction Phase.....	30
4.3.2 Operational Phase .....	40
4.3.3 Decommissioning Phase Potential Impacts.....	41
4.3.4 Potential Effects with the Implementation of Mitigation.....	42
4.4 CUMULATIVE ASSESSMENT.....	43
4.4.1 Construction Phase.....	43
4.4.2 Operational Phase.....	44
<b>5. WFD ASSESSMENT CONCLUSION.....</b>	<b>45</b>
<b>6. REFERENCES.....</b>	<b>46</b>

## FIGURES (IN TEXT)

Figure A: Local Hydrology Map.....	9
Figure B: WFD Groundwater and Surface Waterbody Status (2016-2021).....	15

## TABLES IN TEXT

Table A: Downstream Catchment Size for River Waterbodies.....	8
Table B: Summary WFD Information for Surface Water Bodies .....	11
Table C: Summary WFD Information for Groundwater Bodies .....	12
Table D: Screening of WFD water bodies located within the study area.....	18
Table E: Potential Effects on Surface Water Quality Within Wind Farm Site During the Construction Phase (Unmitigated).....	26
Table F: Potential Effects on Surface Water Quality along Grid Connection During the Construction Phase (Unmitigated) .....	26
Table G: Potential Effects on Groundwater Quality/Quantity at Wind Farm Site During the Construction Phase (Unmitigated) .....	27
Table H: Potential Effects on Groundwater Quality/Quantity along the Grid Connection During the Construction Phase (Unmitigated) .....	28
Table I: Potential Effects on Surface Water Quantity During the Operational Phase (Unmitigated) .....	29
Table J: Potential Effects on Surface Water Quality During the Operational Phase (Unmitigated) .....	30
Table K: Potential Effects on Groundwater at the Wind Farm Site During the Operational Phase (Unmitigated) .....	30
Table L: Summary of WFD Status for Unmitigated and Mitigated Scenarios .....	43

# 1. INTRODUCTION

## 1.1 BACKGROUND

Hydro-Environmental Services (HES) were requested by MKO, acting on behalf of Umma More Ltd, to complete a Water Framework Directive (WFD) Compliance Assessment for a planning application for the proposed Umma More Renewable Energy Development, the Proposed Development (Wind Farm Site and Grid Connection). The Wind Farm Site is located approximately 3.5km southwest of Ballymore village and 14km northwest of Athlone (distance from proposed Wind Farm Site boundary). The townlands in which the proposed Wind Farm Site is located are listed in Table 1-1 in Chapter 1 of the EIAR.

The underground electrical cabling route includes for a substation and temporary construction compound located within the Wind Farm Site and associated underground electrical cabling route situated between the proposed onsite substation and the Thornsberry 110KV substation. The underground electrical cabling route is ~31km long located along local and regional roads and the N52 road.

The full description of the Proposed Development is provided in Chapter 4 of the EIAR. As detailed in Section 1.1.1 in Chapter 1, for the purposes of this EIAR, the various project components are described and assessed using the following references: 'Proposed Development', 'the Site', 'Wind Farm Site' and 'Grid Connection'.

The purpose of this WFD assessment is to determine if any specific components or activities associated with the Proposed Development will compromise WFD objectives or cause a deterioration in the status of any surface water or groundwater body and/or jeopardise the attainment of good surface water or groundwater status. This assessment will determine the water bodies with the potential to be impacted, describe the proposed mitigation measures and determine if the Proposed Development is in compliance with the objectives of the WFD.

This Revised WFD Compliance Assessment is intended to supplement the EIAR submitted and EIAR Addendum Report as part of the Wind Farm Site planning application. This Revised WFD Compliance Assessment presents relevant updates to the baseline environment and assessment. The updated information is presented in green color text to facilitate ease of reference.

This report has been compiled using the following data sources:

- Environmental Protection Agency database (www.epa.ie);
- Observation recorded during various site visits as described in Section 9.2.2 of the EIAR;
- Drainage mapping as described in Section 9.3.4 of the EIAR; and,
- Surface Water Quality sampling as described in Section 9.3.6 of the EIAR.

## 1.2 STATEMENT OF AUTHORITY

Hydro-Environmental Services (HES) are a specialist hydrological, hydrogeological and environmental practice that delivers a range of water and environmental management consultancy services to the private and public sectors across Ireland and Northern Ireland. HES was established in 2005, and our office is located in Dungarvan, County Waterford. We routinely complete impact assessments for hydrology and hydrogeology for a large variety of project types including wind farms.

This WFD assessment was prepared by Michael Gill, Conor McGettigan and Nitesh Dalal.

Michael Gill (P. Geo., B.A.I., MSc, Dip. Geol., MIEI) is an Environmental Engineer with over 18 years' environmental consultancy experience in Ireland. Michael has completed numerous hydrological and hydrogeological impact assessments of wind farms in Ireland. He has also

managed EIAR assessments for infrastructure projects and private residential and commercial developments. In addition, he has substantial experience in wastewater engineering and site suitability assessments, contaminated land investigation and assessment, wetland hydrology/hydrogeology, water resource assessments, surface water drainage design and SUDs design, and surface water/groundwater interactions. For example, Michael has worked on the EIS/EIARs for Slievecallan WF, Cahermurphy (Phase I & II) WF, Carrownagowan WF, and Croagh WF and over 100 other wind farm related projects across the country.

Conor McGettigan (BSc, MSc) is an Environmental Scientist with over 4 years' experience in environmental consultancy in Ireland. Conor holds an M.Sc. in Applied Environmental Science (2020) and a B.Sc. in Geology (2016) from University College Dublin. Conor has prepared the Land, Soils and Geology and Hydrology and Hydrogeology Chapters for numerous wind farm EIAR projects. Conor routinely completes WFD Compliance Assessments for a wide variety of projects including wind farms, quarries and proposed residential developments.

Nitesh Dalal (B.Tech, PG Dip., MSc) is an Environmental Scientist with over 7 years' experience in environmental consultancy and environmental management in India. Nitesh holds an M.Sc. in Environmental Science (2024) and holds a PG Diploma in Health, Safety and Environment from Annamalai University, India (2021) and B.Tech. in Environmental Engineering (2016) from Guru Gobind Singh Indraprastha University, India (2016).

### 1.3 WATER FRAMEWORK DIRECTIVE

The EU Water Framework Directive (2000/60/EC), as amended by Directives 2008/105/EC, 2013/39/EU and 2014/101/EU ("**WFD**"), was established to ensure the protection of the water environment. The Directive was transposed in Ireland by the European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003), as amended.

The WFD requires that all member states protect and improve water quality in all waters, with the aim of achieving good status by 2027 at the latest. Any new development must ensure that this fundamental requirement of the WFD is not compromised.

The WFD is implemented through the River Basin Management Plans (RBMP) which comprises a six-yearly cycle of planning, action and review. RBMPs include identifying river basin districts, water bodies, protected areas and any pressures or risks, monitoring and setting environmental objectives. In Ireland the first RBMP covered the period from 2009 to 2015 with the second cycle plan covering the period from 2016 to 2021, and the third cycle covers the period from 2022 to 2027<sup>1</sup>. The RBMPs are forward looking.

The Water Action Plan 2024 is Ireland's 3<sup>rd</sup> River Basin Management Plan (2022 - 2027). The objectives of the Water Action Plan 2024 have been integrated into the design of the Proposed Development and include:

- Ensure full compliance with relevant EU legislation;
- Prevent deterioration and maintain a 'high' status where it already exists;
- Protect, enhance and restore all waters with aim to achieve at least good status by 2027;
- Ensure waters in protected areas meet requirements; and,
- Implement targeted actions and pilot schemes in focused sub-catchments aimed at (1) targeting water bodies close to meeting their objectives and (2) addressing more complex issues that will build knowledge during the third cycle.

<sup>1</sup> The WFD RBMP cycles are forward looking plans, so 2009-2015 (1<sup>st</sup> Cycle), 2016-2021 (2<sup>nd</sup> Cycle), and 2022-2027 (3<sup>rd</sup> Cycle) are the plans and they use status from the previous 6 years.

The EPA updates status every three years, but they also complete an additional assessment mid-RBMP cycle. The mid-cycle status does not get reported to the Commission.

The linkage between the two is that the 2<sup>nd</sup> Cycle plan uses the 2009-2015 status, the 3<sup>rd</sup> Cycle plan uses the 2016-2021 status. The 2013-2018 status was not used in the RBMP and the 2019-2024 status will not be used in the next RBMP.

## 2. WATERBODY IDENTIFICATION & CLASSIFICATION

### 2.1 INTRODUCTION

This section identifies those surface waterbodies (SWBs) and groundwater bodies (GWBs) with potential to be affected by the Proposed Development and reviews any available WFD information.

### 2.2 SURFACE WATERBODY IDENTIFICATION

On a regional scale, the Wind Farm Site is located in the Upper Shannon surface water catchment within Hydrometric Area 26F of the Shannon International River Basin District.

On a more local scale the Wind Farm Site is located in the Inny [Shannon]\_SC\_090 sub-catchment and 3 no. WFD river sub-basins. A small area in the northwest of the Wind Farm Site is located within the Inny\_110 river sub-basin while a small section in the southwest of the Wind Farm Site is mapped within the Dungolman\_020 river sub-basin. The vast majority of the Wind Farm Site is situated in the Dungolman\_030 river sub-basin.

Within the Dungolman\_020 river sub-basin, the southwestern corner of the Wind Farm Site drains into the Dungolman\_020 SWB. Within the Dungolman\_030 river sub-basin, the Dungolman River (Dungolman\_030 SWB) flows to the northeast between T4 and T5. This watercourse then flows along the site boundary to the east of T2 and T3 before veering to the northeast to the east of T1. Drainage in this river sub-basin is directed towards the Dungolman River via several smaller streams and drains. The Dungolman River continues to flow to the north before discharging into the Tang River approximately 5.15km north of the Wind Farm Site. Here the Tang River forms part of the Inny\_110 SWB. The Tang River then continues to flow to the northwest and eventually discharges into the Inny River approximately 8.3km northwest of the Wind Farm Site. The Inny River drains into the eastern side of Lough Ree.

As stated above, a small section in the northwest of the Wind Farm Site is located within the Inny\_110 river sub-basin. This are of the Wind Farm Site drains to the northwest via the Ardnacransy south stream which discharges into the Dungolman River approximately 4.3km north of the Wind Farm Site.

**Table A** presents the total catchment area of the river waterbodies in the vicinity and downstream of the Wind Farm Site. The Dungolman\_030 SWB has a total upstream catchment of approximately 73km<sup>2</sup>. The catchment area of the rivers increase progressively further downstream as more streams and rivers discharge into these watercourses. Downstream of the Dungolman\_030 SWB, the Inny\_110 SWB has an upstream catchment area of approximately 1,231km<sup>2</sup>.

The Grid Connection (temporary construction compound, onsite substation and underground electrical cabling route) is located within the Upper Shannon (26) and the Lower Shannon (25A) surface water catchments.

On a more local scale, the underground electrical cabling route is located within the Inny (Shannon) SC\_090, the Brosna\_SC\_030, Brosna\_SC\_020, Silver[Tullamore]\_SC\_010 and Tullamore\_SC\_010 sub-catchments and a total of 11 no. WFD river sub-basins.

The underground electrical cabling route starts from the on-site substation which is located in the south of the Wind Farm Site in WFD Dungolman\_030 river sub-basin. The underground electrical cabling route then enters the Ballynagrenia Stream\_010 and \_020 river sub-basins located within the Lower Shannon surface water catchment (25A). A section of the underground electrical cabling route is located in the Gageborough\_030 and \_020 river sub-basins. The underground electrical cabling route then enters the Brosna\_070 river sub-basin to

the west of Kilbeggan and from here travels south along the N52 national road into the following WFD river sub-basins; Tonaphort\_010, Durrow Abbey Stream\_010, Silver (Tullamore)\_020 and ending in the Tullamore\_030 river sub-basin. These SWBs are all located in the WFD catchment 25A (Lower Shannon).

Within the Lower Shannon (25A) catchment all SWBs draining the proposed underground electrical cabling route drain into the Brosna River. The Ballynageira stream discharges into the Gageborough River which in turn discharges into the Brosna\_080 SWB. Further to the south the Silver River and the Tullamore River discharge into the Brosna\_100 SWB.

**Table A** presents the total catchment area of the river waterbodies in the vicinity and downstream of the proposed underground electrical cabling route. The Durrow Abbey Stream\_010 river waterbody has the smallest total upstream catchment of approximately 9km<sup>2</sup>. Meanwhile downstream of its confluence with the Silver River, the Brosna has the largest total upstream catchment and will be less susceptible to potential impacts arising from works along the proposed underground electrical cabling route.

**Table A: Downstream Catchment Size for River Waterbodies**

WFD River Sub-Basin	Total Catchment Area (km <sup>2</sup> )
Wind Farm Site	
Dungolman_030	~73
Inny_110	~1231
Grid Connection	
Ballynagrenia Stream_010	~11
Ballynagrenia Stream_020	~24
Gageborough_020	~61
Gageborough_030	~126
Brosna_070	~293
Brosna_080	~448
Brosna_090	~488
Tonaphort_010	~10
Durrow Abbey Stream_010	~9
Silver (Tullamore)_020	~55
Silver (Tullamore)_030	~70
Silver (Tullamore)_040	~81
Tullamore_030	~109
Tullamore_040	~131
Clodiagh Tullamore_050	~253
Brosna_100	~885

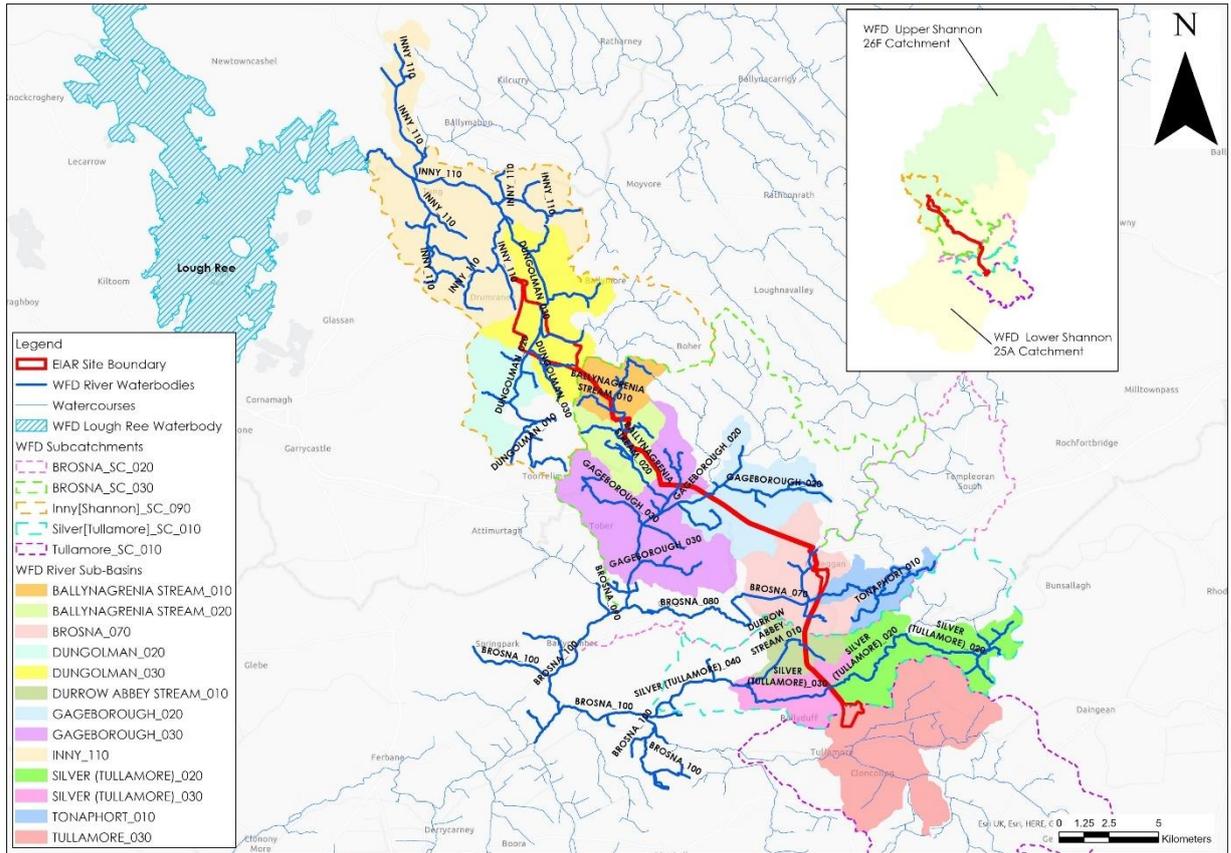


Figure A: Local Hydrology Map

### 2.3 SURFACE WATER BODY CLASSIFICATION

A summary of the WFD status and risk result for SWBs downstream of the Wind Farm Site and the Grid Connection are shown in **Table B**. The overall status of SWBs is based on the ecological, chemical and quantitative status of each SWB. Surface water Body (SWB) status information is available from ([www.catchments.ie](http://www.catchments.ie)).

As stated above the majority of the Wind Farm Site is located in the Dungolman\_030 WFD river sub-basin. The Dungolman\_030 SWB achieved 'Poor Status' in all 3 no. WFD cycles (2010-2015, 2013-2018 and 2016-2021) and has been deemed to be 'at risk' of failing to meet its WFD objectives. Meanwhile, the Dungolman\_020 SWB previously achieved 'Good' status in both the 2010-2015 and the 2013-2018 WFD Cycles but more recently achieved 'Poor' status in the latest 2016-2021 WFD Cycle. The Dungolman\_020 is 'at risk' of failing to meet its WFD objectives. The Inny\_011 SWB achieved 'Moderate' status in the latest WFD cycle (2016-2021). The risk status of this SWB is currently 'under review'.

The 3<sup>rd</sup> Cycle Upper Shannon Catchment Report (*May 2024*) states that the issues driven by the pressures in this catchment are mainly nutrient pollution, organic pollution and altered morphological condition (habitat) impacts for surface water. Urban wastewater is listed as a significant pressure on the Dungolman\_030 SWB which is impacted by the Ballymore agglomeration while agriculture is listed as significant pressure on Dunagolman\_020 SWB. No significant pressures have been identified on the Inny\_110 SWB. No significant pressures have been identified to be impacting on the Lough Ree lake waterbody.

The proposed underground electrical cabling route is approximately 31km in length, orientated in a south-westerly direction that ends approximately 1km northwest of Tullamore town. There are 11 no. watercourse crossings across 9 no. river waterbodies along the proposed underground electrical cabling route which are located over mapped EPA watercourses. In the vicinity of the Wind Farm Site, the Dungolman\_030 SWB is of 'Poor' status and is under

significant pressure from urban wastewater. Meanwhile, within the Lower Shannon surface water catchment (26F), the Ballynagrenia Stream\_010, the Durrow Abbey Stream and the Tullamore\_030 SWBs in the vicinity of the underground electrical cabling route achieved 'Poor' status in the latest WFD cycle whilst the Tonaphort\_010 SWB achieved 'Moderate' status. Other waterbodies in the vicinity and downstream of the underground electrical cabling route, including the Brosna\_070 and the Brosna\_090 SWB's, the Ballynagrenia Stream\_020 SWB, the Gageborough River (\_020 and \_030) and the Silver (Tullamore)\_020 and Silver (Tullamore)\_030 SWB's achieved 'Good' status. The Clodiagh Tullamore\_050, Silver (Tullamore)\_040, Tullamore\_040, Brosna\_080 and Brosna\_100 SWB's downstream of the underground electrical cabling route all achieved 'Moderate' status in the latest WFD cycle (2016-2021).

The 3<sup>rd</sup> Cycle Lower Shannon Catchment Report (May 2024) states that the issues driven by the pressures are mainly nutrient pollution, altered morphological condition (habitat) and organic pollution impacts for surface water. Agriculture is identified as a significant pressure on Ballynagrenia Stream\_010, Durrow Abbey Stream\_010, Silver (Tullamore)\_040, Tullamore\_030 and Brosna\_100 SWBs. Meanwhile hydromorphology is listed as a significant pressure on the Ballynagrenia Stream\_010 and the Clodiagh Tullamore\_050 SWBs in the vicinity of the underground electrical cabling route. Urban Runoff is identified as a significant pressure on the Tullamore\_030 and Tullamore\_040 SWBs, forestry is identified significant pressure on Durrow Abbey Stream\_010 SWB, abstraction is identified significant pressure on Clodiagh Tullamore\_050 SWB while there is unknown significant pressure on Brosna\_080 SWB.

The SWB status for these waterbodies are shown on **Figure B**.

Table B: Summary WFD Information for Surface Water Bodies

SWB	Overall Status (2010-2015)	Overall Status (2013-2018)	Overall Status (2016-2021)	Risk Status (3 <sup>rd</sup> Cycle)	Pressures
<b>Wind Farm Site</b>					
Dungolman_020	Good	Good	Poor	At risk	Agriculture
Dungolman_030	Poor	Poor	Poor	At risk	Urban Wastewater
Inny_110	Unassigned	Moderate	Moderate	Under Review	None
Lough Ree	Moderate	Good	Good	Not at risk	None
<b>Grid Connection Route</b>					
Ballynagrenia Stream_010	Moderate	Moderate	Poor	At Risk	Hydromorphology & Agriculture
Ballynagrenia Stream_020	Good	Good	Good	Not at Risk	None
Gageborough_030	Good	Good	Good	Not at Risk	None
Gageborough_020	Moderate	Good	Good	Under Review	None
Brosna_070	Good	Good	Good	Not at Risk	None
Brosna_080	Moderate	Good	Moderate	At Risk	Unknown
Brosna_090	Good	Good	Good	Not at Risk	None
Tonaphort_010	Unassigned	Unassigned	Moderate	Under Review	None
Durrow Abbey Stream_010	Moderate	Moderate	Poor	At Risk	Forestry & Agriculture
Silver (Tullamore)_020	Good	Good	Good	Not at Risk	None
Silver (Tullamore)_030	Good	Good	Good	Not at Risk	None
Silver (Tullamore)_040	Good	Moderate	Moderate	At risk	Agriculture
Tullamore_030	Unassigned	Moderate	Poor	At risk	Agriculture & Urban Runoff
Tullamore_040	Poor	Moderate	Moderate	At risk	Urban Runoff
Clodiagh Tullamore_050	Poor	Poor	Moderate	At risk	Hydromorphology & Abstraction
Brosna_100	Moderate	Moderate	Moderate	At risk	Agriculture

## 2.4 GROUNDWATER BODY IDENTIFICATION

According to data from the GSI database and bedrock geology series ([www.gsi.ie](http://www.gsi.ie)), the Wind Farm Site is underlain by a Locally Important Aquifer (LI – Bedrock which is generally moderately productive only in local zones), which consists of Dinantian Upper Impure Limestones (DUIL).

The Inny GWB (IE\_SH\_G\_110) underlies the Wind Farm Site.

The Grid Connection is located within several GWBs, which include, from north to south, the Inny GWB, the Clara GWB (IE\_SH\_G\_240), the Gageborough-Brosna Gravels Group 1 GWB (IE\_SH\_G\_253), the Kilbeggan gravels GWB (IE\_SH\_G\_242) and the Tullamore GWB (IE\_SH\_G\_232).

## 2.5 GROUNDWATER BODY CLASSIFICATION

All GWBs in the vicinity of the Wind Farm Site and along the underground electrical cabling route achieved 'Good' status in all 3 no. WFD cycles (2010-2015, 2013-2018 and 2016-2021). This status applies to both the quantitative status and the chemical status of the GWB. These GWBs have been deemed to be 'Not at risk' of failing to meet their respective WFD objectives. No significant pressures have been identified to be impacting these GWBs.

**Table C: Summary WFD Information for Groundwater Bodies**

GWB	Overall Status (2010-2015)	Overall Status (2013-2018)	Overall Status (2016-2021)	Risk Status (3 <sup>rd</sup> Cycle)	Pressures
<b>Wind Farm Site</b>					
Inny	Good	Good	Good	Not At risk	None
<b>Grid Connection</b>					
Clara	Good	Good	Good	Not At Risk	None
Gageborough-Brosna Gravels Group 1	Good	Good	Good	Not At risk	None
Kilbeggan gravels	Good	Good	Good	Not At risk	None
Tullamore	Good	Good	Good	Not At Risk	None

## 2.6 ZONE OF INFLUENCE

The Zone of Influence (ZOI) of the Wind Farm Site and Grid Connection extend to the following SWBs and GWBs:

- River waterbodies – Dungolman (020 and 030), Inny\_110, Ballynagrenia Stream (010 and 020), Gageborough (020 and 030), Brosna (070 to 100), Tonaphort\_010, Durrow Abbey Stream\_010, Silver (Tullamore) \_020 (020 to 040), Tullamore (030 and 040) and Clodiagh Tullamore\_050 rivers.
- GWBs – Inny, Clara, Gageborough-Brosna Gravels Group 1, Kilbeggan Gravels and Tullamore GWBs.
- Lake waterbodies – Lough Ree.

## 2.7 PROTECTED AREA IDENTIFICATION

The WFD requires that activities are also in compliance with other relevant legislation, as considered below. Nature conservation designations, bathing waters, Nutrient Sensitive Areas (NSA's), shellfish protected areas, salmonid waters and Drinking Water Protected Area's (DWPA) within the vicinity of the Wind Farm Site and Grid Connection are looked at as part of the assessment.

### 2.7.1 Nature Conservation Designations

Within the Republic of Ireland designated sites include Natural Heritage Areas (NHAs), Proposed Natural Heritage Areas (pNHAs), Special Areas of Conservation (SACs), candidate Special Areas of Conservation (cSAC) and Special Protection Areas (SPAs).

Ramsar sites are wetlands of international importance designated under the Ramsar Convention (adopted in 1971 and came into force in 1975), providing a framework for the conservation and wise use of wetlands and their resources.

The Wind Farm Site or the Grid Connection are not located within any of the designated sites.

There are no designated sites immediately downstream of the Wind Farm Site. The closest downstream designated sites, within the ZOI, are the Lough Ree SAC and pNHA (Site Code: 000440), and SPA (Site Code: 004062), located approximately 10.5km to the northwest. These designated sites are associated with the Lough Ree lake waterbody. The length of the hydrological flowpath between the Wind Farm Site and these designated sites is >12km. Note that there are no designated sites downstream of the Wind Farm Site associated with the Dungolman (020 and 030) and Inny\_110 SWBs.

Other designated sites within 15km of the Wind Farm Site include:

- Ballynagrenia and Ballinderry Bog NHA (Site Code: 000674), approximately 2km to the south;
- Lough Sewdy pNHA (Site Code: 000689), approximately 3.2km to the northeast;
- Ballymore Fen SAC (Site Code: 002313), approximately 4.8km to the northeast;
- Ballynagarbry pNHA (Site Code: 001717), approximately 5.2 km to the south;
- Carn Park Bog SAC and pNHA (Site Code: 000676), approximately 6.3km to the southwest;
- Waterstown Lake pNHA (Site Code: 001732), approximately 7.2km to the west;
- Royal Canal pNHA (Site Code: 002103), approximately 9.1km to the North; and,
- Crosswood Bog SAC and pNHA (Site Code: 002337), approximately 9.7km to the southwest.

In terms of the SWBs within the ZOI of the Grid Connection, there are no designated sites located along the Ballynagrenia Stream (010 and 020), Gageborough (020 and 030), Brosna (070 to 100), Tonaphort\_010, Durrow Abbey Stream\_010, Silver (Tullamore) \_020 (020 to 040), Tullamore (030 and 040) and Clodiagh Tullamore\_050 SWBs. The closest downstream designated site is the River Shannon Callows SAC and Middle Shannon Callows SPA which are situated ~20km downstream of the Grid Connection.

Other designated sites within the 10km of the Grid Connection are:

- Woodfield Bog (Site Code: 000586), approximately 2km to the south;
- Split Hills and Long Hill Esker SAC and pNHA (Site Code: 001831), approximately 2.6km to the north;
- Nure Bog NHA (Site Code: 001725), approximately 8.6km to the northeast;
- Lough Ennell SAC and pNHA (Site Code: 000685), approximately 8.6km to the northeast;
- Cloncrow Bog (New Forest) NHA (Site Code: 000677), approximately 6.2km to the east;
- Grand Canal pNHA (Site Code: 002104), approximately 900m to the east and south;
- Ardan Wood pNHA (Site Code: 001711) approximately 3.8km to the east;
- Murphy's Bridge Esker pNHA (Site Code: 001775) approximately 2.9km to the east;

- Derrygolan Esker pNHA (Site Code: 000896), approximately 1km to the east;
- Raheenmore Bog SAC and pNHA (Site Code: 000582), approximately 10.5km to the east;
- Clara Bog SAC and pNHA (Site Code: 000572), approximately 4.6km to the west;
- Ballyduff Wood pNHA (Site Code: 001777), approximately 1.9km to the west;
- Ballyduff Esker pNHA (Site Code: 000885), approximately 4.2km to the west;
- Charleville Wood SAC and pNHA (Site Code: 000571), approximately 2.7km to the southwest;
- Hawkswood Bog NHA (Site Code: 002355), approximately 7.2km to the south;
- Clonad Wood pNHA (Site Code: 000574), approximately 7km to southwest;
- Screggan Bog NHA (Site Code: 000921), approximately 7.5km to the southwest;
- Pallas Lough pNHA (Site Code: 000916), approximately 9.5km to the southwest, and;
- Kilcormac Esker pNHA (Site Code: 000906), approximately 8.7km to the southwest.

### 2.7.2 Bathing Waters

Bathing waters are those designated under the Bathing Water Directive (76/160/EEC) or the later revised Bathing Water Directive (2006/7/EC).

There are no bathing water sites located in the vicinity of the Wind Farm Site or the Grid Connection. The Site is ~16.5km west of Lilliput, Lough Ennell (IESHBWL25\_188\_0100), the nearest bathing water site (as the crow flies). There is no hydrological connection between the Site and Lough Ennell.

### 2.7.3 Nutrient Sensitive Areas

Nutrient Sensitive Areas (NSA) comprise Nitrate Vulnerable Zones and polluted waters designated under the Nitrates Directive (91/676/EEC) and areas designated as sensitive areas under the Urban Wastewater Treatment Directive (UWWTD)(91/271/EEC). Sensitive areas under the UWWTD are water bodies affected by eutrophication associated with elevated nitrate concentrations and act as an indication that action is required to prevent further pollution caused by nutrients.

Lough Ree downstream of the Wind Farm Site, and the Brosna River (070 to \_100 SWBs) and Tullamore\_040 SWB downstream of the Grid Connection are identified as NSAs.

### 2.7.4 Shellfish Waters

The Shellfish Waters Directive (2006/113/EC) aims to protect or improve shellfish waters in order to support shellfish life and growth.

There are no shellfish protected area sites within the vicinity or downstream of the Wind Farm Site or the Grid Connection.

### 2.7.5 Salmonid Waters

The Salmonid Regulations (S.I. 293 / 1988) identifies the protected river that are designated as Designated Salmonid Waters under S.I. No. 293/1988 - European Communities (Quality of Salmonid Waters) Regulations 1988, 14<sup>th</sup> August 1988. The Council Directive 78/659/EEC of 18<sup>th</sup> July 1978 on the quality of fresh waters needing protection or improvement in order to support fish life and the Council Directive 92/42/EEC of 21<sup>st</sup> May 1992 on the conservation of natural habitats and of wild fauna and flora was transposed into Irish law under the Fish Directive S.I. 293/1988 and Habitats Directive S.I. 477/2011.

There are no designated Salmonid Waters within the vicinity or downstream of the Wind Farm Site or the Grid Connection.

### 2.7.6 Drinking Water

The closest surface water DWPA downstream of the Wind Farm Site is located on the Shannon (Upper)\_120 SWB. This DWPA is associated with Uisce Éireann's abstraction for the Athlone Water Supply. This abstraction is located downstream of Lough Ree.

The Brosna\_080 DWPA downstream of the Grid Connection is listed as Drinking Water Protected Areas (DWPA's). The length of the hydrological flowpath between the Grid Connection and this DWPA is ~3.8km.

The Shannon (Lower)\_010 DWPA is located downstream of the Grid Connection via the Brosna River. This DWPA is associated with the Banagher PWS which has a daily abstraction volume of 2,688m<sup>3</sup>/day. The length of the hydrological flowpath between the Grid Connection and this DWPA is in excess of 35km.

All GWB's in Ireland are considered as DWPAs. The Grid Connection is mapped within the Tullamore Ardan PWS.

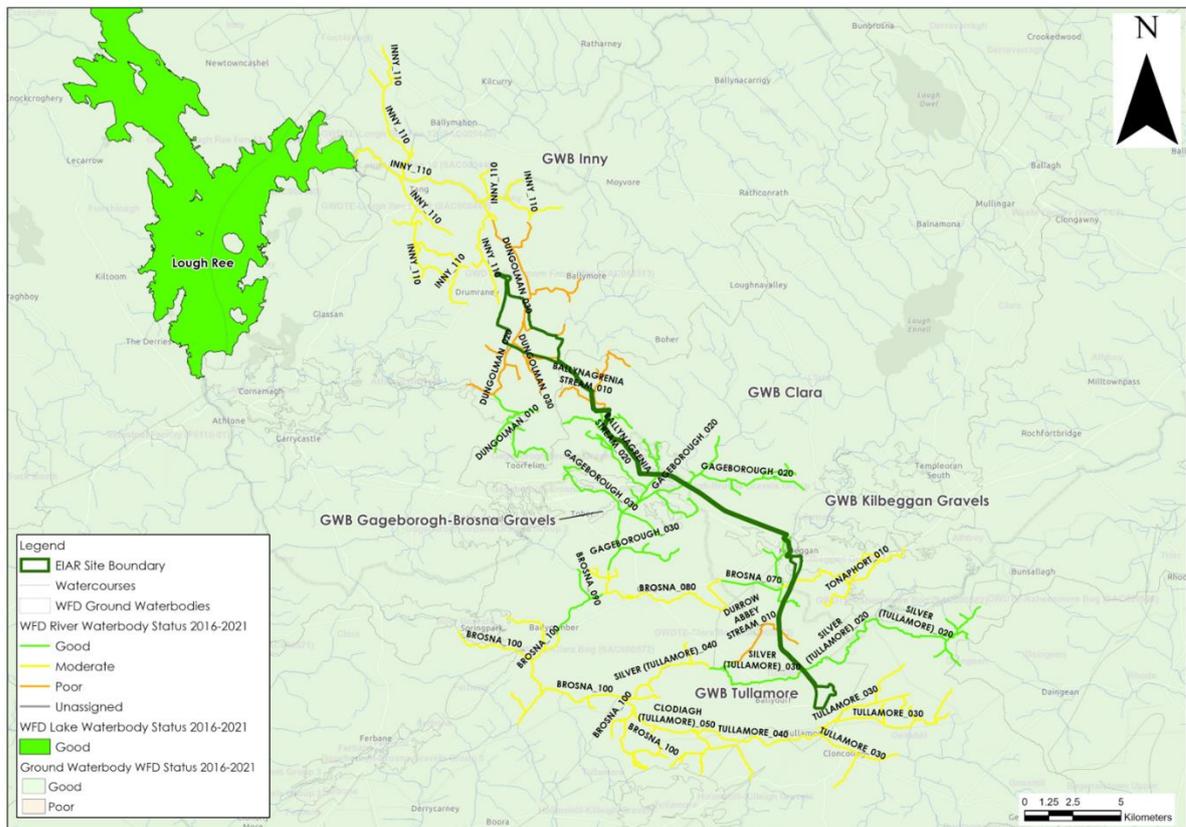


Figure B: WFD Groundwater and Surface Waterbody Status (2016-2021)

## 3. WFD SCREENING

### 3.1 WIND FARM SITE

As discussed in **Section 2**, there are a total of 3 no. river water bodies that are located in the vicinity or downstream of the Wind Farm Site. In addition, there is 1 no. lake waterbody located downstream of the Wind Farm Site. Furthermore, the Wind Farm Site is underlain by 1 no. GWB.

### 3.2 GRID CONNECTION

The Grid Connection underground electrical cabling route is located in 11 no. WFD river sub-basins with a total of 11 no. proposed watercourse crossings. In addition, the underground electrical cabling route is underlain by 4 no. GWBs.

### 3.3 SURFACE WATER BODIES

With consideration for the construction, operational and decommissioning phases of the Proposed Development at the Wind Farm Site, it is considered that the Dungolman\_030 and Inny\_110 rivers that are located in the vicinity and downstream of the Wind Farm Site are carried through into the WFD Compliance Assessment. The Proposed Development works within the Wind Farm site must not in any way result in a deterioration in the status of these SWBs and/or prevent them from meeting the biological and chemical characteristics for good status in the future.

The Dungolman\_020 SWB has been screened out of further assessment as all works associated with the Proposed Development are located downstream of this SWB. Consequently the proposed works have no potential to cause a deterioration in the status of this SWB and/or jeopardise the attainment of good surface water status.

Further downstream, the Lough Ree (IE\_SH\_26\_750a) SWB has been screened out due to the large volumes of water within this lake waterbody and the large catchment area to Lough Ree. The Proposed Development works have no potential to cause a deterioration in the status of this SWB and/or jeopardise the attainment of good surface water status. *Note that the Proposed Development does not in any way rely upon the dilution or assimilative capacity of any downstream waterbody. The mitigation measures prescribed in Section 4.3 will ensure the protection of all waterbodies, including those proximal to the works.*

All waterbodies along the underground electrical cabling route (Ballynagrenia Stream\_010, Ballynagrenia Stream\_020, Gageborough\_020, Gageborough\_030, Brosna\_070, Tonaphort\_010, Durrow Abbey Stream\_010, Silver (Tullamore) \_020, Silver (Tullamore) \_030 and Tullamore\_030) are carried through to the WFD Compliance Assessment. The Proposed Development works along the Grid Connection underground electrical cabling route must not in any way result in a deterioration in the status of these SWB's and/or prevent them from meeting the biological and chemical characteristics for good status in the future.

Further downstream the Brosna\_080, Brosna\_090, Brosna\_100, Silver(Tullamore)\_040, Tullamore\_040 and Clodiagh Tullamore\_050) SWBs have all been screened out of further assessment due to the increasing volumes of water within these SWBs, the absence of any works within their respective sub-basins and the nature (*minor and transient nature*) of the proposed works along the underground electrical cabling route. The Proposed Development works have no potential to cause a deterioration in the status of this SWB and/or jeopardise the attainment of good surface water status.

### 3.4 GROUNDWATER BODIES

With respect to GWBs, the Inny GWB has been screened in due to its location directly underlying the Wind Farm Site. The Proposed Development works at the Wind Farm Site must not in any way result in a deterioration in the status of this GWB and/or prevent it from meeting the biological and chemical characteristics for good status in the future.

With respect to GWBs along the underground electrical cabling route, the Inny GWB, Clara GWB, Gageborough-Brosna Gravels Group 1 GWB, Kilbeggan Gravels GWB and Tullamore GWB have been screened in as they directly underlie the Proposed Development. The Proposed Development works along the Grid Connection underground electrical cabling route must not in any way result in a deterioration in the status of these GWB and/or prevent them from meeting the biological and chemical characteristics for good status in the future.

### 3.5 PROTECTED AREAS

All the designated sites in the vicinity of the Wind Farm Site or the Grid Connection have been screened out due to their location upstream of the Proposed Development or lack of hydrological connection between the Proposed Development and the designated sites. Lough Ree SAC, SPA and pNHA is located downstream of the Wind Farm Site but has been screened out due to its distant location and large volume of water within the Lough Ree.

The Lilliput, Lough Ennell bathing water has been screened out due to lack of hydrological connection between the Proposed Development and the Bathing water.

The Lough Ree NSA has been screened out due to the large volumes of water within the NSA. The Brosna River (080 to 100) and Tullamore\_040 NSAs has been screened out due to absence of any works within these river sub-basin, the nature of the upstream grid connection route works and the increasing volumes of water within these NSAs. The Brosna\_070 NSA has been screened in as the Grid Connection is located within the Brosna\_070 river sub-basin. An assessment is required to consider the potential impacts of the Proposed Development on this NSA.

The Brosna\_080 DWPA has been included in the WFD Compliance Assessment due to the location of works along the Grid Connection upstream of this DWPA. The Shannon (Lower)\_010 DWPA and the Shannon (Upper)\_120 DWPA have been screened out due to their distant location from the Proposed Wind Farm and the large volumes of water within the River Shannon.

All GWB DWPAs are included in the WFD Compliance Assessment due to their location directly underlying the Proposed Development. The assessment on these DWPAs will be completed alongside the assessment of the potential effects on the underlying GWBs.

### 3.6 WFD SCREENING SUMMARY

A summary of WFD Screening discussed above is shown in **Table D**.

Table D: Screening of WFD water bodies located within the study area

Type	WFD Classification	Waterbody Name/ID	Inclusion in Assessment	Justification
Surface Water Body	River	Dungolman_020	No	While a small section in the southwest of the Wind Farm Site is located in the Dungolman_020 river sub-basin, no development works are proposed in this area. The Dungolman_020 SWB is therefore located upstream of all Proposed Development works and the Proposed Development has no potential to impact the status of this SWB.
	River	Dungolman_030	Yes	The majority of the Wind Farm Site, including all 9 no. turbines are mapped within the catchment area of the Dungolman_030 SWB. An assessment is required to consider the potential impacts of the Proposed Development on this SWB.
	River	Inny_110	Yes	The Inny_110 SWB is located directly downstream of the Dungolman_030 SWB and in close proximity to the Wind Farm Site (<1km). An assessment is required to consider the potential impacts of the Proposed Development on this SWB.
	Lake	Lough Ree	No	The Lough Ree SWB has been screened out due to the large volumes of water within the SWB. The Proposed Development has no potential to impact the status of this SWB
	River	Ballynagrenia Stream_010	Yes	The proposed underground electrical cabling route is located within the Ballynagrenia Stream_010 river sub-basin. An assessment is required to consider the potential impacts of the Proposed Development on this SWB.
	River	Ballynagrenia Stream_020	Yes	The proposed underground electrical cabling route is located within the Ballynagrenia Stream_020 river sub-basin. An assessment is required to consider the potential impacts of the Proposed Development on this SWB.
	River	Gageborough_020	Yes	The proposed underground electrical cabling route is located within the Gageborough_020 river sub-basin. An assessment is required to consider the potential impacts of the Proposed Development on this SWB.
	River	Gageborough_030	Yes	The proposed underground electrical cabling route is located within the Gageborough_030 river sub-basin. An assessment is required to consider the potential impacts of the Proposed Development on this SWB.
	River	Brosna_070	Yes	The proposed underground electrical cabling route is located within the Brosna_070 river sub-basin. An assessment is required to consider the potential impacts of the Proposed Development on this SWB.
	River	Brosna_080	No	The Brosna_080 SWB has been screened out due to absence of any works within its river sub-basin, the nature of the upstream underground electrical cabling route works and the increasing volumes of water within this SWB, The Proposed Development has no potential to impact the status of this SWB.

	River	Brosna_090	No	The Brosna_090 SWB has been screened out due to absence of any works within its river sub-basin, the nature of the upstream underground electrical cabling route works and the increasing volumes of water within this SWB, The Proposed Development has no potential to impact the status of this SWB
	River	Tonaphort_010	<b>Yes</b>	The proposed underground electrical cabling route is located within the Tonaphort_010 river sub-basin. An assessment is required to consider the potential impacts of the Proposed Development on this SWB.
	River	Durrow Abbey Sream_010	<b>Yes</b>	The proposed underground electrical cabling route is located within the Durrow Abbey Sream_010 river sub-basin. An assessment is required to consider the potential impacts of the Proposed Development on this SWB.
	River	Silver (Tullamore) _020	<b>Yes</b>	The proposed underground electrical cabling route is located within the Silver (Tullamore) _020 river sub-basin. An assessment is required to consider the potential impacts of the Proposed Development on this SWB.
	River	Silver (Tullamore) _030	<b>Yes</b>	The proposed underground electrical cabling route is located within the Silver (Tullamore) _030 river sub-basin. An assessment is required to consider the potential impacts of the Proposed Development on this SWB.
	River	Silver (Tullamore)_040	No	The Silver (Tullamore)_040 SWB has been screened out due to the absence of any works within its river sub-basin, the nature of the upstream underground electrical cabling route works and the increasing volumes of water within this SWB, The Proposed Development has no potential to impact the status of this SWB
	River	Tullamore_030	<b>Yes</b>	The proposed underground electrical cabling route is located within the Silver (Tullamore) _030 river sub-basin. An assessment is required to consider the potential impacts of the Proposed Development on this SWB.
	River	Tullamore_040	No	The Tullamore_040 SWB has been screened out due to the absence of any works within its river sub-basin, the nature of the upstream underground electrical cabling route works and the increasing volumes of water within this SWB, The Proposed Development has no potential to impact the status of this SWB
	River	Clodiagh Tullamore_050	No	The Clodiagh Tullamore_050 SWB has been screened out due to the absence of any works within its river sub-basin, the nature of the upstream underground electrical cabling route works and the increasing volumes of water within this SWB, The Proposed Development has no potential to impact the status of this SWB
	River	Brosna_100	No	The Brosna_100 SWB has been screened out due to absence of any works within its river sub-basin, the nature of the upstream underground electrical cabling route works and the increasing volumes of water within this SWB, The Proposed Development has no potential to impact the status of this SWB
Groundwater Body	Groundwater	Inny	<b>Yes</b>	The majority of the Wind Farm site including 9 no. turbines overlies the Suck South GWB. An assessment is required to consider potential impacts of the Proposed Development to this GWB.

	Groundwater	Clara	<b>Yes</b>	The proposed underground electrical cabling route overlies the Clara GWB. An assessment is required to consider potential impacts of the Proposed Development to this GWB
	Groundwater	Gageborough-Brosna Gravels Group 1	<b>Yes</b>	The proposed underground electrical cabling route overlies the Gageborough-Brosna Gravels Group 1 GWB. An assessment is required to consider potential impacts of the Proposed Development to this GWB
	Groundwater	Kilbeggan Gravels	<b>Yes</b>	The proposed underground electrical cabling route overlies the Kilbeggan Gravels GWB. An assessment is required to consider potential impacts of the Proposed Development to this GWB
	Groundwater	Tullamore	<b>Yes</b>	The proposed underground electrical cabling route overlies the Tullamore GWB. An assessment is required to consider potential impacts of the Proposed Development to this GWB
<b>Protected Areas</b>	Designated Sites	Ballynagrenia and Ballinderry Bog NHA	No	The Ballynagrenia and Ballinderry Bog NHA has been screened out due to its location upstream of the Proposed Development. The Proposed Development has no potential to impact the status of this NHA.
		Lough Sewdy pNHA	No	The Lough Sewdy pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this pNHA. The Proposed Development has no potential to impact the status of this pNHA.
		Ballynagarbry pNHA	No	The Ballynagarbry pNHA has been screened out due to its location upstream of the Proposed Development. The Proposed Development has no potential to impact the status of this pNHA.
		Carn Park Bog SAC and pNHA	No	The Carn Park Bog SAC and pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this SAC and pNHA. The Proposed Development has no potential to impact the status of this SAC and pNHA.
		Waterstown Lake pNHA	No	The Waterstown Lake pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this pNHA. The Proposed Development has no potential to impact the status of this pNHA.
		Royal Canal pNHA	No	The Royal Canal pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this pNHA. The Proposed Development has no potential to impact the status of this pNHA.
		Crosswood Bog SAC and pNHA	No	The Crosswood Bog SAC and pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this SAC and

				pNHA. The Proposed Development has no potential to impact the status of this SAC and pNHA.
		Lough Ree SAC, SPA and pNHA	No	The Lough Ree SAC, SPA and pNHA has been screened out due to distant location and the large volumes of water within the Lough Ree. The Proposed Development has no potential to impact the status of this SAC, SPA and pNHA.
		Woodfield Bog pNHA	No	The Woodfield Bog pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this pNHA. The Proposed Development has no potential to impact the status of this pNHA.
		Split Hills and Long Hill Esker SAC and pNHA	No	The Split Hills and Long Hill Esker SAC and pNHA has been screened out due to its location upstream of the Proposed Development. The Proposed Development has no potential to impact the status of this SAC and pNHA.
		Nure Bog NHA	No	The Nure Bog NHA has been screened out due to its lack of hydrological connection between the Proposed Development and this NHA. The Proposed Development has no potential to impact the status of this NHA.
		Lough Ennell SAC and pNHA	No	The Lough Ennell SAC and pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this SAC and pNHA. The Proposed Development has no potential to impact the status of this SAC and pNHA.
		Cloncrow Bog (New Forest) NHA	No	The Cloncrow Bog (New Forest) NHA has been screened out due to its location upstream of the Proposed Development. The Proposed Development has no potential to impact the status of this NHA.
		Grand Canal pNHA	No	The Grand Canal pNHA has been screened out due to its location upstream of the Proposed Development. The Proposed Development has no potential to impact the status of this pNHA.
		Ardan Wood pNHA	No	The Ardan Wood pNHA has been screened out due to its location upstream of the Proposed Development. The Proposed Development has no potential to impact the status of this pNHA.
		Murphy's Bridge Esker pNHA	No	The Murphy's Bridge Esker pNHA has been screened out due to its location upstream of the Proposed Development. The Proposed Development has no potential to impact the status of this pNHA.
		Derrygolan Esker pNHA	No	The Derrygolan Esker pNHA has been screened out due to its location upstream of the Proposed Development. The Proposed Development has no potential to impact the status of this pNHA.
		Raheenmore Bog SAC and pNHA	No	The Raheenmore Bog SAC and pNHA has been screened out due to its location upstream of the Proposed Development. The Proposed Development has no potential to impact the status of this SAC and pNHA.

		Clara Bog SAC and pNHA	No	The Clara Bog SAC and pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this SAC and pNHA. The Proposed Development has no potential to impact the status of this SAC and pNHA.
		Ballyduff Wood pNHA	No	The Ballyduff Wood pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this pNHA. The Proposed Development has no potential to impact the status of this pNHA.
		Ballyduff Esker pNHA	No	The Ballyduff Esker pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this pNHA. The Proposed Development has no potential to impact the status of this pNHA.
		Charleville Wood SAC and pNHA	No	The Charleville Wood SAC and pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this SAC and pNHA. The Proposed Development has no potential to impact the status of this SAC and pNHA.
		Hawkswood Bog NHA	No	The Hawkswood Bog NHA has been screened out due to its lack of hydrological connection between the Proposed Development and this NHA. The Proposed Development has no potential to impact the status of this NHA.
		Clonad Wood pNHA	No	The Clonad Wood pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this pNHA. The Proposed Development has no potential to impact the status of this pNHA.
		Screggan Bog NHA	No	The Screggan Bog NHA has been screened out due to its lack of hydrological connection between the Proposed Development and this pNHA. The Proposed Development has no potential to impact the status of this pNHA.
		Pallas Lough pNHA	No	The Pallas Lough pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this pNHA. The Proposed Development has no potential to impact the status of this pNHA.
		Kilcormac Esker pNHA	No	The Kilcormac Esker pNHA has been screened out due to its lack of hydrological connection between the Proposed Development and this pNHA. The Proposed Development has no potential to impact the status of this pNHA.
	Bathing Water	Lilliput, Lough Ennell	No	The Lilliput, Lough Ennell has been screened out due to lack of hydrological connection between the Proposed Development and the Bathing water. The Proposed Development has no potential to impact the status of this Bathing water.
Nutrient Sensitive Areas	Lough Ree	No	The Lough Ree NSA has been screened out due to the large volumes of water within the NSA. The Proposed Development has no potential to impact the status of this NSA.	

		Brosna_070 River	<b>Yes</b>	The Grid Connection is located within the Brosna_070 river sub-basin. An assessment is required to consider the potential impacts of the Proposed Development on this NSA.
		Brosna River (080 to 100)	No	The Brosna River (080 to 100) NSAs has been screened out due to absence of any works within these river sub-basin, the nature of the upstream grid connection route works and the increasing volumes of water within these NSAs. The Proposed Development has no potential to impact the status of these NSAs.
		Tullamore_040	No	The Tullamore_040 NSA has been screened out due to absence of any works within its river sub-basin, the nature of the upstream grid connection route works and the increasing volumes of water within this NSA, The Proposed Development has no potential to impact the status of this NSA.
	Drinking Water Protected Areas	Brosna_080	<b>Yes</b>	For the purposes of a conservative assessment, the Brosna_080 DWPA has been screened in as it is located directly downstream of the Brosna_070 SWB.

## 4. WFD COMPLIANCE ASSESSMENT

### 4.1 DEVELOPMENT PROPOSAL

The Proposed Development works within the Wind Farm Site includes 9 no. turbines, 2 no. temporary construction compounds, a 110kV substation, 1 no. meteorological met mast, spoil management areas, and associated access roads (new and upgrade of existing) within the Wind Farm Site.

The Proposed Development works for the Grid Connection include the substation and construction compound within the Wind Farm Site and the underground 110kV electricity cabling connecting the proposed onsite substation to the existing 110kV Thornsbury substation near Tullamore, Co. Offaly. This will involve the excavation of a trench primarily along the public road, placement of ducting and backfilling of the trench.

The Proposed Development also includes works along the Turbine Delivery Route (TDR) and all associated site development works including tree felling, drainage infrastructure and landscaping.

Due to the nature of wind farm developments (and associated grid connections and TDR works), being near surface construction activities, impacts on groundwater are generally negligible and surface water is generally the main sensitive receptor assessed during impact assessments. The primary risks to groundwater at the site will be from cementitious materials, hydrocarbon spillage and leakages, and potential piling works.

The primary risk to surface waters will be entrained suspended sediments (soil and subsoil particles) in site runoff during earthworks and tree felling along with cement-based compounds.

The Proposed Development includes works over and in close proximity to waterbodies. There are a number of potential adverse effects to both surface and groundwater.

The primary risks of degradation of surface water bodies include:

- Changes in surface runoff flow volumes and flow patterns;
- Entrainment of suspended solids in surface waters; and,
- Chemical pollution of surface waters by concrete, oil and or fuels.

The primary risks of degradation of groundwaters include:

- Chemical pollution of groundwaters by concrete, oils and fuels.

### 4.2 POTENTIAL EFFECTS

#### 4.2.1 Construction Phase (Unmitigated)

##### 4.2.1.1 Potential Surface Water Quality Effects from Works within Wind Farm Site

Construction phase activities including site levelling/construction and building turbine foundation excavation and the excavation of the underground electrical cabling route trench will require earthworks resulting in removal of vegetation cover and excavation of mineral soil/subsoil (where present). The main risk will be from surface water runoff from spoil management areas and excavation drainage/dewatering during construction works. These activities can result in the entrainment of suspended solids in surface waters. However, no direct pathways exist between the Wind Farm site and downstream surface waterbodies. Therefore,

construction phase activities within the Wind Farm site do not have the potential to increase the suspended sediment load or turbidity in downstream surface water receptors.

Hydrocarbons and cement-based compounds will also be used during the construction phase. Accidental spillage during refuelling of construction plant with petroleum hydrocarbons is a significant pollution risk to surface waters at all construction. The accumulation of small spills of fuels and lubricants during routine plant use can also be a pollution risk. Hydrocarbon has a high toxicity to humans, and all flora and fauna, including fish, and is persistent in the environment. It is also a nutrient supply for adapted micro-organisms, which can rapidly deplete dissolved oxygen in waters, resulting in the death of aquatic organisms. However, no direct surface water pathways exist between the Wind Farm Site and downstream surface waterbodies. Therefore, accidental spillage of hydrocarbons within the Wind Farm Site have limited potential to impact the water quality in downstream surface watercourses.

It is also estimated that 6.4ha (hectares) in of existing forestry will be felled in the area near T4 to allow for development of the Wind Farm Site. The area to be felled as part of the Proposed Development accounts for just 0.67% of the total Wind Farm Site area. Potential water quality impacts resulting from tree felling will arise from:

- Exposure of soil and subsoils due to vehicle tracking, and skidding or forwarding extraction methods resulting in a source of suspended sediment which can become entrained in surface water runoff and enter surface watercourses;
- Entrainment of suspended sediment in watercourses due to vehicle tracking through watercourses;
- Damage to roads resulting in a source of suspended sediment which can become entrained in surface water runoff and enter surface watercourses;
- Release of sediment attached to timber in stacking areas; and,
- Nutrient release.

In addition, groundwater seepages may occur in turbine base excavations, particularly those on lower elevations and this will create additional volumes of water to be treated by the drainage management system. Inflows will likely require management and treatment to reduce suspended sediments.

Surface water quality impacts may also arise during the diversion, culverting, road and site underground cabling crossing of surface watercourses during the construction phase. These activities can result in morphological changes, changes to drainage patterns and alteration of aquatic habitats. Construction of structures over watercourses has the potential to significantly interfere with water quality and flows during the construction phase. It is proposed that 1 no. watercourse crossings will be constructed across the Dungolman river and 11 no. minor field drain crossings will be required to facilitate the wind farm access roads within the Wind Farm Site.

The surface water receptors likely to be impacted by these activities include the Dungolman\_030 SWB and the Inny\_110 SWB. However, as shown in **Table A**, the Inny\_110 SWB is less susceptible to potential surface water quality effects due to the large volumes of water within this SWB associated with its large upstream catchment. *Note that the Proposed Development does not in any way rely upon dilution or the assimilative capacity of any waterbody. The mitigation measures prescribed in Section 4.3 ensure the protection of all watercourses in the vicinity and downstream of the Proposed Development.*

A summary of potential status change to SWBs arising from potential water pollution (suspended solids entrainment, hydrocarbon spillage, release of cement-based products and/or wastewater) during the unmitigated construction phase are outlined in **Table E**.

**Table E: Potential Effects on Surface Water Quality Within Wind Farm Site During the Construction Phase (Unmitigated)**

SWB	WFD Code	Current Status	Assessed Status Change	Potential
Dungolman_030	IE_SH_26D060400	Poor	Bad	
Inny_110	IE_SH_26I011400	Moderate	Moderate	

#### 4.2.1.2 Potential Surface Water Quality Effects along the Grid Connection

Based on the WFD mapping, there will be a requirement for 11 no. watercourse crossings along the proposed underground electrical cabling route ((located at existing bridges and culverts). In total there are 34 no. watercourse crossings along the underground electrical cabling route (EPA mapped and non-EPA mapped) as shown in Figure 4-26 of Chapter 4 of the EIAR.

No in-stream works are required at any of these watercourse crossings, however due to the close proximity of local waterbodies to the Grid Construction work at the crossing locations, there is a potential for surface water quality impacts during trench excavation work due to runoff from the road surface. This runoff may contain elevated concentrations of suspended sediment, cementitious runoff and/or hydrocarbons.

Some minor groundwater/surface water seepages will likely occur in trench excavations and substation foundation excavations and this will create additional volumes of water to be treated by the runoff management system. Inflows will likely require management and treatment to reduce suspended sediments.

Construction activities along the underground electrical cabling route have the potential to negatively impact the status of the Dungolman\_030, Ballynagrenia Stream\_010 and \_020, Gageborough\_020 and \_030, Brosna\_070, Tonaphort\_010, Durrow Abbey Stream\_010, Silver (Tullamore)\_020 and \_030 and Tullamore\_030 SWBs. However, there is only the potential for short-term effects due to the minor and transient nature of the works. This restricts the potential for the works associated with the underground electrical cabling route to alter the overall status of a SWB.

A summary of potential status change to SWBs arising from works along the proposed underground electrical cabling route during the unmitigated construction phase are outlined in **Table F**.

**Table F: Potential Effects on Surface Water Quality along Grid Connection During the Construction Phase (Unmitigated)**

SWB	WFD Code	Current Status	Assessed Status Change	Potential
Dungolman_030	IE_SH_26D060400	Poor	Poor	
Ballynagrenia Stream_010	IE_SH_25B160400	Poor	Poor	
Ballynagrenia Stream_020	IE_SH_25B160600	Good	Good	
Gageborough_020	IE_SH_25G010300	Good	Good	
Gageborough_030	IE_SH_25G010500	Good	Good	
Brosna_070	IE_SH_25B090450	Good	Good	

Tonaphort_010	IE_SH_25T450930	Moderate	Moderate
Durrow Abbey Stream_010	IE_SH_25D120200	Poor	Poor
Silver (Tullamore) _020	IE_SH_25S030100	Good	Good
Silver (Tullamore) _030	IE_SH_25S030300	Good	Good
Tullamore_030	IE_SH_25T030300	Poor	Poor

#### 4.2.1.3 Potential Effects on Groundwater Quality/Quantity at the Wind Farm Site

The accidental spillage of hydrocarbons, the release of effluent from wastewater treatment systems and the release of cement-based products have the potential to negatively impact on groundwater water quality at the Wind Farm Site.

In addition, groundwater seepages may occur in turbine base excavations, particularly those on lower elevations and this will create additional volumes of water to be treated by the drainage management system.

However, due to the low permeability of the bedrock aquifer and the shallow nature of the Proposed Development works, there is limited potential for the works at the Wind Farm Site to alter the overall status of the underlying Inny GWB. The potential for the Proposed Development to impact the status of the overall GWB is limited further by the scale of the Proposed Development in comparison to the overall size of the Inny GWB which covers an area of 1,384km<sup>2</sup>.

A summary of potential status change to GWBs arising from works at the Wind Farm Site during the unmitigated construction phase are outlined in **Table G**.

**Table G: Potential Effects on Groundwater Quality/Quantity at Wind Farm Site During the Construction Phase (Unmitigated)**

GWB	WFD Code	Current Status	Assessed Potential Status Change
Inny	IE_SH_G_110	Good	Good

#### 4.2.1.4 Potential Effects on Groundwater Quality/Quantity along the Grid Connection Route

The accidental spillage of hydrocarbons, the release of effluent from wastewater treatment systems and the release of cement-based products have the potential to negatively impact on groundwater water quality along the proposed underground electrical cabling route.

Some minor groundwater/surface water seepages will likely occur in trench excavations which will impact local groundwater quantity.

However, due to the shallow, short-term and transient nature of the Proposed Development works along the underground electrical cabling route, there is no potential for any effects during earthworks and excavation works on the qualitative status of the overall GWBs (due to the scale of the Proposed Project in comparison with the overall area of the GWBs).

A summary of potential status change to GWBs arising from works along the underground electrical cabling route during the unmitigated construction phase are outlined in **Table H**.

**Table H: Potential Effects on Groundwater Quality/Quantity along the Grid Connection During the Construction Phase (Unmitigated)**

GWB	WFD Code	Current Status	Assessed Status Change	Potential
Inny	IE_SH_G_110	Good	Good	
Clara	IE_SH_G_240	Good	Good	
Gageborough-Brosna Gravels Group 1	IE_SH_G_253	Good	Good	
Kilbeggan gravels	IE_SH_G_242	Good	Good	
Tullamore	IE_SH_G_232	Good	Good	

#### 4.2.1.5 Groundwater and Surface Water Impacts due to Temporary Junction Works

Minor haul route works are required at 7 no. locations listed below, however all proposed road works are small-scale and localised, and no significant water quality impacts are anticipated.

- Location 1 – M6 Junction 10 left slip/N55 junction in Athlone
- Location 2 – N55/R916 Cornamaddy Roundabout
- Location 3 – N55/R390 Junction in Athlone
- Location 4 – Bend on R390 at Coolteen
- Location 5 – Bends on R390 at Beechlawn
- Location 6 – R390/L5363 Junction
- Location 7 – Access Junction on L5363

Due to the shallow nature of the temporary junction works, impacts on groundwater flows and levels are not anticipated.

#### 4.2.1.6 Potential Protected Area Impacts

The hydrological and hydrogeological water connections from the Wind Farm Site and the Grid Connection could transfer poor quality surface water that may affect the conservation objectives of these designated sites. The designated sites and protected areas included in this assessment and deemed to be hydrologically or hydrogeologically connected to the Wind Farm Site or the Grid Connection include:

Brosna\_070 NSA: The Grid Connection is located within the Brosna\_070 river sub-basin. Any potential deterioration in surface water quality has the potential to affect this NSA.

Brosna\_080 DWPA: The Grid Connection is located upstream of the Brosna\_080 DWPA. However, the potential for effects are limited given the short-term and transient nature of the works along the Grid Connection and the length of the hydrological flowpath between the works and the DWPA.

Other designated sites and protected areas are either not connected hydrologically with the Wind Farm Site or the Grid Connection, or are located at a significant distance downstream and have been screened out of the WFD Compliance Assessment. The Proposed Development has no potential to impact these screened out designated sites and protected areas.

#### 4.2.2 Operational Phase (Unmitigated)

Potential effects associated with the operational phase of the Proposed Development will be much reduced in comparison to the construction phase. Any effects will occur at the Wind

Farm site and will be associated with minor maintenance works or changes in runoff volumes associated with the footprint of the Proposed Development.

No maintenance works will be required along the Grid Connection and therefore there is no potential to impact on the status of downstream SWBs or underlying GWBs.

#### 4.2.2.1 Potential Surface Water Quantity Effects

Progressive replacement of the vegetated surfaces with impermeable surfaces could potentially result in an increase in the proportion of surface water runoff reaching the surface water drainage network. The footprint comprises of 9 no. turbine hardstandings, new and upgraded access roads, and the onsite substation.

During storm rainfall events, additional runoff coupled with increased velocity of flow could increase hydraulic loading, resulting in erosion of watercourses and impact on aquatic ecosystems.

The greatest potential for effects on surface water quantity and flow volumes is associated with the Proposed Development works within the Dungolman\_030 WFD river sub-basin. The replacement of natural surfaces with impermeable surfaces, associated with hardstands and access tracks has the potential to increase runoff rates to local watercourses and increase downstream flow volumes. However, the additional runoff volume will be low due to the fact that runoff from the Site is naturally high and that all hardstand areas will be constructed of permeable stone aggregate.

A summary of potential status change to SWBs arising from increased runoff during the operation phase of the Proposed Development in the unmitigated scenario are outlined in **Table I**.

**Table I: Potential Effects on Surface Water Quantity During the Operational Phase (Unmitigated)**

SWB	WFD Code	Current Status	Assessed Potential Status Change
Dungolman_030	IE_SH_26D060400	Poor	Poor
Inny_110	IE_SH_26I011400	Moderate	Moderate

#### 4.2.2.2 Potential Surface Water Quality Effects

During the operational phase, the potential for silt-laden runoff is much reduced compared to the construction phase. In addition, all permanent drainage controls will be in place and the disturbance of ground and excavation works will be complete. Some minor maintenance works may be completed, such as maintenance of site entrances, internal roads and hardstand areas. These works would be of a very minor scale and would be very infrequent. Potential sources of sediment laden water would only arise from surface water runoff from small areas where new material is added during maintenance works.

Any leakage of oils at the Wind Farm Site, associated with the transformers in the turbines and the substation, would have the potential to impact on local surface water quality.

A summary of potential status change to SWBs arising from surface water quality impacts during the operation phase of the Proposed Development in the unmitigated scenario are outlined in **Table J**.

**Table J: Potential Effects on Surface Water Quality During the Operational Phase (Unmitigated)**

SWB	WFD Code	Current Status	Assessed Potential Status Change
Dungolman_030	IE_SH_26D060400	Poor	Poor
Inny_110	IE_SH_26I011400	Moderate	Moderate

#### 4.2.2.3 Potential Groundwater Quality/Quantity Effects

The potential for effects on groundwater quality is reduced in comparison with the construction phase. Any leakage of oils or wastewater at the Site would have the potential to result in a deterioration in the qualitative status of local groundwater. However, due to the nature of the operational phase and the overall scale of the underlying GWBs, there is no potential for a deterioration in the overall qualitative status of the underlying GWBs to be impacted.

Any potential piling works will not result in any significant changes to regional groundwater flowpaths or groundwater levels due to the small footprint of any potential piles and the large areas covered by the underlying GWBs. There is no potential for the Proposed Development to alter the quantitative status of the underlying GWBs.

A summary of potential status change to GWBs arising from potential groundwater quality impacts during the operational phase of the Proposed Development in the unmitigated scenario are outlined in **Table K**.

**Table K: Potential Effects on Groundwater at the Wind Farm Site During the Operational Phase (Unmitigated)**

GWB	WFD Code	Current Status	Assessed Potential Status Change
Inny	IE_SH_G_110	Good	Good

#### 4.2.2.4 Potential Effects on Protected Areas

During the operational phase, the potential for silt-laden runoff is much reduced compared to the construction phase. In addition, all permanent drainage controls will be in place and the disturbance of ground and excavation works will be complete.

Therefore, the risk of any operational phase activities that may affect the conservation objectives of the protected areas is reduced from that defined for the construction phase (i.e. the greatest potential for the deterioration in the status of downstream protected areas occurs during the construction phase).

### 4.3 MITIGATION MEASURES

In order to mitigate against the potential negative effects on surface and groundwater quality, quantity and flow patterns, mitigation measures will be implemented during the construction and operational phases of the Proposed Development. These are outlined below.

#### 4.3.1 Construction Phase

##### 4.3.1.1 Mitigation Measures to Prevent Suspended Solids Entrainment in Surface Waters

#### Wind Farm Site

The key mitigation measure during the construction phase is the avoidance of sensitive aquatic areas where possible, by application of suitable buffer zones (i.e. 50m to main watercourses, and 10m to main drains). All of the key development components within the Wind Farm Site are located significantly away from the delineated 50m watercourse buffer zones with the exception of the upgrading of the existing watercourse crossing, new drain crossing and upgrades to existing site tracks. Spoil management areas for removed soil/subsoil will be localised to spoil management areas outside of these buffer zones and will be designed and constructed with the minimal amount of surface area exposed. In these spoil management areas, the vegetative top-soil layer will be removed and re-instated or reseeded directly after construction, allowing for re-vegetation which will mitigate against erosion. Additional control measures, which are outlined further on in this section, will be undertaken at the proposed watercourse and drain crossing locations.

It should be noted that an extensive network of agricultural and forestry drains already exists, and these will be integrated and enhanced as required and used within the Wind Farm Site drainage system. The integration of the existing drainage network and the Wind Farm Site network is relatively simple. The key elements being the upgrading and improvements to water treatment elements, such as in line controls and treatment systems, including silt traps, settlement ponds and buffered outfalls.

The main elements of interaction with existing drains will be as follows:

- Apart from interceptor drains, which will convey clean runoff water to the downstream drainage system there will be no direct discharge (without treatment for sediment reduction, and attenuation for flow management) of runoff from the Wind Farm Site drainage into the existing site drainage network where possible. This will reduce the potential for any increased risk of downstream flooding or sediment transport/erosion;
- Silt traps will be placed in the existing drains upstream of any streams where construction works / tree felling is taking place, and these will be diverted into proposed interceptor drains, or culverted under/across the works area;
- Buffered outfalls which will be numerous over the Wind Farm Site which will promote percolation of drainage waters across vegetation and close to the point at which the additional runoff is generated, rather than direct discharge to the existing drains of the Wind Farm Site; and,
- Drains running parallel to the existing roads requiring widening will be upgraded. Velocity and silt control measures such as check dams, sand bags, oyster bags, straw bales, flow limiters, weirs, baffles, silt fences will be used during the upgrade construction works. Regular buffered outfalls will also be added to these drains to protect downstream surface waters.

### **Grid Connection Underground Electrical Cabling Route**

More than 95% of the underground electrical cabling connection route is >50m from any nearby watercourse, sections within 50m of the route are confined to existing watercourse crossings at bridges. It is proposed to limit any works in any areas located within 50m of any watercourse/waterbody including the stockpiling of excavated soils and subsoils.

There are a total of 34 no. watercourse crossings along the underground electrical cabling connection route, as shown in Figure 4-26 of Chapter 4. There are 11 no. river/stream crossings (watercourses mapped by EPA), with the remaining crossings being classified as culverts. All the crossings are existing bridges and culverts along the public road.

No in-stream works are required at any of these crossings, however due to the proximity of the streams to the construction work at the crossing locations, there is a potential for surface water quality impacts during trench excavation work. Mitigation measures are outlined below.

A constraint/buffer zone will be maintained for all crossing locations where possible. In addition, measures which are outlined below will be implemented to ensure that silt laden or

contaminated surface water runoff from the excavation work does not discharge directly to the watercourse.

The large setback distance from sensitive hydrological features means that adequate room is maintained for the proposed drainage mitigation measures (discussed below) to be properly installed and operate effectively. The proposed buffer zone will:

- Avoid physical damage to watercourses, and associated release of sediment;
- Avoid excavations within close proximity to surface watercourses;
- Avoid the entry of suspended sediment from earthworks into watercourses; and,
- Avoid the entry of suspended sediment from the construction phase drainage system into watercourses, achieved in part by ending drain discharge outside the buffer zone and allowing percolation across the vegetation of the buffer zone.

#### **Water Treatment Train:**

If the discharge water from construction areas fails to be of a high quality, then a filtration treatment system (such as a 'siltbuster' or similar equivalent treatment train (sequence of water treatment processes)) will be used to filter and treat all surface discharge water collected in the dirty water drainage system. This will apply for all of the construction phase.

#### **Silt Fences:**

Silt fences will be emplaced within drains down-gradient of all construction areas. Silt fences are effective at removing heavy settleable solids. This will act to prevent entry to watercourses of sand and gravel sized sediment, released from excavation of mineral sub-soils of glacial and glacio-fluvial origin, and entrained in surface water runoff. Inspection and maintenance of these structures during construction phase is critical to their functioning to stated purpose. They will remain in place throughout the entire construction phase. Double silt fences will be emplaced within drains down-gradient of all construction areas inside the hydrological buffer zones.

#### **Silt Bags:**

Silt bags will be used where small to medium volumes of water need to be pumped from excavations. As water is pumped through the bag, most of the sediment is retained by the geotextile fabric allowing filtered water to pass through. Silt bags will be used with natural vegetation filters.

#### **Pre-emptive Site Drainage Management:**

The works programme for the initial construction phase of the Proposed Development will also take account of weather forecasts, and predicted rainfall in particular. Large excavations and movements of soil/subsoil or vegetation stripping will be suspended or scaled back if heavy rain is forecast. The extent to which works will be scaled back or suspended will relate directly to the amount of rainfall forecast.

The following forecasting systems are available and will be used on a daily basis at the site to direct proposed construction activities:

- General Forecasts: Available on a national, regional, and county level from the Met Eireann website ([www.met.ie/forecasts](http://www.met.ie/forecasts)). These provide general information on weather patterns including rainfall, wind speed and direction but do not provide any quantitative rainfall estimates;
- MeteoAlarm: Alerts to the possible occurrence of severe weather for the next 2 days. Less useful than general forecasts as only available on a provincial scale;
- 3 hour Rainfall Maps: Forecast quantitative rainfall amounts for the next 3 hours but does not account for possible heavy localised events;
- Rainfall Radar Images: Images covering the entire country are freely available from the Met Eireann website ([www.met.ie/latest/rainfall\\_radar.asp](http://www.met.ie/latest/rainfall_radar.asp)). The images are a composite of radar data from Shannon and Dublin airports and give a picture of current rainfall extent and intensity. Images show a quantitative measure of recent rainfall. A 3

hour record is given and is updated every 15 minutes. Radar images are not predictive; and,

- Consultancy Service: Met Eireann provide a 24 hour telephone consultancy service. The forecaster will provide interpretation of weather data and give the best available forecast for the area of interest.

Using the safe threshold rainfall values will allow work to be safely controlled (from a water quality perspective) in the event of forecasting of an impending high rainfall intensity event.

Works will be suspended if forecasting suggests any of the following is likely to occur, or if on-site monitoring indicates any of the following has occurred:

- >10 mm/hr (i.e. high intensity local rainfall events);
- >25 mm in a 24 hour period (heavy frontal rainfall lasting most of the day); or,
- >half monthly average rainfall in any 7 days.
- Prior to, and after, works being suspended the following control measures will be undertaken:
  - All open excavations will be secured and sealed off;
  - Provide temporary or emergency drainage to prevent back-up of surface runoff; and,
  - Avoid working during heavy rainfall and for up to 24 hours after heavy events to ensure drainage systems are not overloaded.

#### **Management of Runoff from Spoil Management Areas:**

It is proposed that excavated soil will be used for landscaping where required.

During the initial construction of roads, silt fences, straw bales and biodegradable geogrids will be used to control surface water runoff from works areas.

Where applicable, the vegetative top-soil layer of the spoil management areas will be rolled back to facilitate placement of excavated spoil up to a maximum height of 1.0 metres, following which the vegetative-top soils layer will be reinstated. Where reinstatement is not possible, spoil management areas will be sealed with a digger bucket and seeded as soon possible to reduce sediment entrainment in runoff.

#### **Management of Runoff from underground electrical cabling connection route and existing and proposed access roads:**

Where construction is undertaken along sections of the underground electrical cabling connection route, proposed access road or existing roads requiring upgrade, the drainage management infrastructure (as outlined above) will be in place to manage and control runoff from the trench excavation area. Where the internal electrical cable trench is to be constructed off-road (within the Wind Farm Site) or for the Grid Connection underground electrical cabling route along public roads, surface water control measures such as silt fences will be employed when work is required within hydrological buffer zones.

#### **Timing of Site Construction Works:**

Construction of the Wind Farm Site drainage system will only be carried out during periods of low rainfall, and therefore minimum runoff rates. This will minimise the risk of entrainment of suspended sediment in surface water runoff, and transport via this pathway to surface watercourses. Construction of the drainage system during this period will also ensure that attenuation features associated with the drainage system will be in place and operational for all subsequent construction works.

#### **Monitoring:**

An inspection and maintenance plan for the on-site drainage system will be prepared in advance of commencement of any works. Regular inspections of all installed drainage systems will be undertaken, especially after heavy rainfall, to check for blockages, and ensure

there is no build-up of standing water in parts of the systems where it is not intended. Inspections will also be undertaken after tree felling.

Any excess build-up of silt levels at dams, the settlement pond, or any other drainage features that may decrease the effectiveness of the drainage feature, will be removed.

During the construction phase field testing and laboratory analysis of a range of parameters with relevant regulatory limits and EQSs should be undertaken for each primary watercourse, and specifically following heavy rainfall events (i.e. weekly, monthly and event based).

#### **4.3.1.2 Mitigation Measures to Protect Surface Water Quality during Felling Operations**

All felling of coniferous plantations will be done in accordance with the current best practice methods.

A suite of mitigation measures relating to clear felling of coniferous plantations are summarised below. These include avoidance controls and mitigation by design which includes source controls, in-line controls, water treatment controls, and outfall controls.

In addition to these mitigation measures, drains in the vicinity and downstream of the proposed felling areas will be subject to frequent inspection both pre and post-felling. Additionally, surface water quality monitoring shall be completed before, during (if the operation is conducted over a protracted time period) and after felling operations and until the water quality has returned to pre-activity status if an impact has occurred. Daily surface water monitoring forms will also be utilised at every works location in close proximity to a watercourse.

#### **Summary of Mitigation Measures Associated with Proposed Felling Operations**

Avoidance Controls:

- There is a requirement in the Forest Service Code of Practice and in the FSC Certification Standard for the installation of buffer zones adjacent to aquatic zones at planting phase. Minimum buffer zone widths recommended in the Forest Service (2000) guidance document "Forestry and Water Quality Guidelines"
- During the Wind Farm Site construction phase a buffer zone of 50m will be maintained for all streams and rivers where possible, and a 10m buffer will be applied to main drains.
- All proposed tree felling areas are located outside of imposed buffer zones. The large distance between proposed felling areas and sensitive aquatic zones means that potential poor quality runoff from felling areas can be adequately managed and attenuated prior to even reaching the aquatic buffer zone and primary drainage routes. Where tree felling is required in the vicinity of streams, the following additional mitigation measures will be employed.

Mitigation by Design:

- Machine combinations will be chosen which are most suitable for ground conditions at the time of felling, and which will minimise soils disturbance;
- Checking and maintenance of roads and culverts will be on-going through any felling operation. No tracking of vehicle through watercourses will occur, as vehicles will use road infrastructure and existing watercourse crossing points. Where possible, existing drains will not be disturbed during felling works;
- Ditches which drain from the proposed area to be felled towards existing surface watercourses will be blocked, and temporary silt traps will be constructed. No direct discharge of such ditches to watercourses will occur. Drains and sediment traps will be installed during ground preparation. Collector drains will be excavated at an acute angle to the contour (~0.3%-3% gradient), to minimise flow velocities;

- Sediment traps will be sited in drains downstream of felling areas. Machine access will be maintained to enable the accumulated sediment to be excavated. Sediment will be carefully disposed of in the spoil management areas. Where possible, all new silt traps will be constructed on even ground and not on sloping ground;
- In areas particularly sensitive to erosion, it may be necessary to install double or triple sediment traps. This measure will be reviewed on site during construction;
- All drainage channels will taper out before entering the aquatic buffer zone. This ensures that discharged water gently fans out over the buffer zone before entering the aquatic zone, with sediment filtered out from the flow by ground vegetation within the zone. On erodible soils, silt traps will be installed at the end of the drainage channels, to the outside of the buffer zone;
- Drains and silt traps will be maintained throughout all felling works, ensuring that they are clear of sediment build-up and are not severely eroded. Correct drain alignment, spacing and depth will ensure that erosion and sediment build-up are minimized and controlled;
- Brush mats will be used to support vehicles on soft ground, reducing mineral soils erosion and avoiding the formation of rutted areas, in which surface water ponding can occur. Brush mat renewal should take place when they become heavily used and worn. Provision should be made for brush mats along all off-road routes, to protect the soil from compaction and rutting. Where there is risk of severe erosion occurring, extraction should be suspended during periods of high rainfall;
- Timber will be stacked in dry areas, and outside a local 50m watercourse buffer. Straw bales and check dams to be emplaced on the down gradient side of timber storage/processing sites;
- Works will be carried out during periods of no, or low rainfall, in order to minimise entrainment of exposed sediment in surface water run-off;
- Checking and maintenance of roads and culverts will be on-going through the felling operation;
- Any diesel or fuel oils stored at the temporary site compounds will be bunded. The bund capacity will be sufficient to contain 110% of the storage tank's maximum capacity;
- Refuelling or maintenance of machinery will not occur within 100m of a watercourse. Mobile bowser, drip kits, qualified personnel will be used where refuelling is required; and,
- Branches, logs or debris will not be allowed to build up in aquatic zones. All such material will be removed when harvesting operations have been completed, but care will be taken to avoid removing natural debris deflectors.
- Silt traps will be strategically placed down-gradient within forestry drains near streams. The main purpose of the silt traps and drain blocking is to slow water flow, increase residence time, and allow settling of silt in a controlled manner.

**Drain Inspection and Maintenance:**

The following items shall be carried out during inspection pre-felling and after:

- Communication with tree felling operatives in advance to determine whether any areas have been reported where there is unusual water logging or bogging of machines;
- Inspection of all areas reported as having unusual ground conditions;
- Inspection of main drainage ditches and outfalls. During pre-felling inspection, the main drainage ditches shall be identified. Ideally the pre-felling inspection shall be carried out during rainfall;
- Following tree felling all main drains shall be inspected to ensure that they are functioning;
- Extraction tracks near drains need to be broken up and diversion channels created to ensure that water in the tracks spreads out over the adjoining ground;
- Culverts on drains exiting the site will be unblocked; and,
- All accumulated silt will be removed from drains and culverts, and silt traps, and this removed material will be deposited away from watercourses to ensure that it will not be carried back into the trap or stream during subsequent rainfall.

**Surface Water Quality Monitoring:**

Sampling will be completed before, during (if the operation is conducted over a protracted time) and after the felling activity. The 'before' sampling will be conducted within 4 weeks of the felling activity, preferably in medium to high water flow conditions. The "during" sampling will be undertaken once a week passes, or after rainfall events. The 'after' sampling will comprise as many samplings as necessary to demonstrate that water quality has returned to pre-activity status (i.e. where an impact has been shown).

**Criteria for the selection of water sampling points include the following:**

- Avoid man-made ditches and drains, or watercourses that do not have year round flows, i.e. avoid ephemeral ditches, drains or watercourses;
- Select sampling points upstream and downstream of the forestry activities;
- It is advantageous if the upstream location is outside/above the forest in order to evaluate the impact of land-uses other than forestry;
- Where possible, three downstream locations should be selected: one immediately below the forestry activity, the second at exit from the forest, and the third some distance from the second (this allows demonstration of no impact through dilution effect or contamination by other land-uses where impact increases at third downstream location relative to second downstream location); and,
- The above sampling strategy will be undertaken for all on-site sub-catchments streams where tree felling is proposed.

**4.3.1.3 Mitigation Measures to Protect Surface Water Quality during Excavation Dewatering**

Management of excavation seepage and subsequent treatment prior to discharge into the drainage network will be undertaken as follows:

- Appropriate interceptor drainage, to prevent upslope surface runoff from entering excavations will be put in place;
- If required, pumping of excavation inflows will prevent build-up of water in the excavation;
- The interceptor drainage will be discharged to the Site constructed drainage system or onto natural vegetated surfaces and not directly to surface waters;
- The pumped water volumes will be discharged via volume and sediment attenuation ponds adjacent to excavation areas, or via specialist treatment systems such as a Siltbuster unit;
- There will be no direct discharge to surface watercourses, and therefore no risk of hydraulic loading or contamination will occur; and,
- Daily monitoring of excavations by a suitably qualified person will occur during the construction phase. If high levels of seepage inflow occur, excavation work should immediately be stopped and a geotechnical assessment undertaken.

**4.3.1.4 Mitigation Measures to Protect Against the Release of Hydrocarbons during Construction and Storage**

Mitigation measures proposed to avoid the release of hydrocarbons at the Wind Farm Site and along the Grid Connection include:

- Onsite re-fuelling of machinery will be carried out using a mobile double skinned fuel bowser. The fuel bowser, a double-axel custom-built refuelling trailer will be re-filled off site (Wind Farm Site and Grid Connection Route), and will be towed around the site by a 4x4 jeep to where machinery is located. The 4x4 jeep will also carry fuel absorbent material and pads in the event of any accidental spillages. The fuel bowser will be parked on a level area in the construction compound when not in use and only

designated trained and competent operatives will be authorised to refuel plant on site. Mobile measures such as drip trays and fuel absorbent mats will be used during all refuelling operations;

- Refuelling or maintenance of machinery will not occur within 100m of a watercourse;
- Fuels stored on site will be minimised;
- Any diesel or fuel oils stored at the temporary site compound will be bunded. The bund capacity will be sufficient to contain 110% of the storage tank's maximum capacity;
- The electrical control building at the Wind Farm Site will be bunded appropriately to the volume of oils likely to be stored, and to prevent leakage of any associated chemicals and to groundwater or surface water. The bunded area will be fitted with a storm drainage system and an appropriate oil interceptor;
- The plant used will be regularly inspected for leaks and fitness for purpose; and,
- An emergency plan for the construction phase to deal with accidental spillages will be contained within Environmental Management Plan. Spill kits will be available to deal with accidental spillages.

#### **4.3.1.5 Mitigation Measures to Prevent Groundwater and Surface Water Contamination from Wastewater Disposal**

- The temporary construction compound adjacent to the onsite substation located within the Wind Farm Site will be used for the construction of the northern section of the underground electrical cabling route;
- Port-a-loos with an integrated waste holding tank will be used at the temporary construction compounds, maintained by the providing contractor, and removed from Wind Farm Site on completion of the construction works;
- Mobile welfare units will be used during the construction of the underground electrical cabling connection route, particularly towards the south of the route;
- Water supply for the Wind Farm Site office and other sanitation will be brought to the Wind Farm Site and removed after use from the Wind Farm Site to be discharged at a suitable off-site treatment location; and,
- No water will be sourced on the Wind Farm Site, or discharged to the Wind Farm Site.

#### **4.3.1.6 Mitigation Measures to Prevent the Release of Cement-Based Products**

Best practice methods for cement-based compounds will be implemented throughout the construction phase. Mitigation measures include:

- No batching of wet-cement products will occur on site/along the grid route works or near other ancillary construction activities. Ready-mixed supply of wet concrete products and where possible, emplacement of pre-cast elements, will take place;
- Where possible pre-cast elements for culverts and concrete works will be used;
- No washing out of any plant used in concrete transport or concreting operations will be allowed on-site;
- Where concrete is delivered on site, only the chute will need to be cleaned, using the smallest volume of water possible. No discharge of cement contaminated waters to the construction phase drainage system or directly to any artificial drain or watercourse will be allowed. Chute cleaning water is to be directed into a dedicated concrete wash out pit. Decommissioning of this pit will occur at the end of the construction phase and water and solids will be tanked and removed from the site to a suitable, non-polluting, discharge location;
- All concrete will be paced in shuttering and will not be in contact with soils or groundwater until after it has set;
- Use weather forecasting to plan dry days for pouring concrete; and,
- Ensure pour site is free of standing water and plastic covers will be ready in case of sudden rainfall event.

#### 4.3.1.7 Mitigation Measures to Prevent Morphological Changes to Surface Water Crossing and Drainage Patterns

Mitigation by-design at the Wind Farm Site includes:

- Where possible all proposed new stream crossings will be bottomless culverts and the existing banks will remain undisturbed. No in-stream excavation works are proposed and therefore there will be no impact on the stream at the proposed crossing location;
- Within the Wind Farm Site where the Grid Connection Route runs adjacent to a proposed access road or an existing access road proposed for upgrade, the Grid Connection Route cable will pass over the culvert (where one exists or is proposed) within the access road;
- Within the Wind Farm Site, where a proposed access road crosses an existing field drain, the crossing will include a suitably sized pip at the correct invert level to maintain the existing flow regime and prevent ponding;
- Where a Grid Connection Route cable stream crossing is required, the cable will pass over the watercourse via suspended ducting thereby avoiding any morphological impacts;
- Any guidance / mitigation measures proposed by the OPW or the Inland Fisheries Ireland will be incorporated into the design of the proposed crossings. A 10m buffer is applied to main drains to allow for future OPW maintenance;
- Works will be completed in accordance with the requirements of "*Inland Fisheries Ireland (2016): Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters*"; and,
- All access road river/stream crossings will require a Section 50 application (Arterial Drainage Act, 1945). The river/stream crossings will be designed in accordance with OPW guidelines/requirements on applying for a Section 50 consent.

With respect to the Grid Connection underground electrical cabling route watercourse crossings, 4 construction crossing methods are proposed that will avoid in-stream works and these include:

- Option A: Where adequate cover exists above a culvert, the standard aforementioned trench arrangement will be used where the cable ducts pass over a culvert without any contact with the existing culvert or water course. The cable trench will pass over the culvert in a standard trench. Where no crossing currently exists, the cable will pass over the watercourse in a bottomless box culvert or pre-cast concrete slab in a standard trefoil arrangement. Where required existing culvert crossings will be extended using appropriately sized corripipes.
- Option B: Where the culvert consists of a socketed concrete or sealed plastic pipe and sufficient depth is not available over the crossing, a trench will be excavated beneath the culvert and cable ducts will be installed in the standard formation 300mm below the existing pipe.
- Option C: Where cable ducts are to be installed over an existing culvert and sufficient cover cannot be achieved, the ducts will be laid in a much shallower trench, the depth of which will be determined by the cover available at the culvert crossing location. The ducts within the shallow formation trench will be encased in 6mm thick steel galvanized plates and backfilled with 35N concrete. Where sufficient deck cover is not available to fully accommodate the required ducts, it may be necessary to locally raise the pavement level. Any addition of a new pavement will be tied back into the existing road pavement at grade.
- Option D: Directional Drilling (DD) is a method of drilling under obstacles such as bridges, culverts, railways, water courses, etc. in order to install cable ducts under the obstacle. This method is employed where installing the ducts using standard installation methods is not possible. The DD method of duct installation will be carried out using Vermeer D36 x 50 Directional Drill (approximately 22 tonnes), or similar plant, for the directional drilling at watercourse/culvert crossings. During the drilling process, a mixture of a natural, inert and fully biodegradable drilling fluid such as Clear Bore™ and water is pumped through

the centre of the drill rods to the reamer head and is forced in to void and enables the annulus which has been created to support the surrounding subsoil and thus prevent collapse of the reamed length.

Mitigation Measures relating to the use of a mixture of a natural, inert and fully biodegradable drilling fluid such as Clear Bore™ and water for directional drilling include:

- The area around the Clear Bore™ batching, pumping and recycling plants will be bunded using terram and sandbags in order to contain any spillages;
- One or more lines of silt fences will be placed between the works area and adjacent rivers and streams on both banks;
- Accidental spillage of fluids will be cleaned up immediately and transported off site for disposal at a licensed facility; and,
- Adequately sized skips will be used for temporary storage of drilling arisings during directional drilling works. This will ensure containment of drilling arisings and drilling flush.

#### **4.3.1.8 Mitigation Measures to Protect Potential Groundwater and Surface Water Impacts due to Temporary Junction Works**

Proposed Mitigation Measures:

##### **Mitigation by Avoidance:**

A constraint/buffer zone will be maintained for all upgrade works locations where possible, whereby all watercourses will be fenced off. In addition, measures which are outlined below will be implemented to ensure that silt laden or contaminated surface water runoff from the excavation work does not discharge directly to the watercourse.

The purpose of the constraint zone is to:

- Avoid physical damage to surface water channels;
- Provide a buffer against hydraulic loading by additional surface water run-off;
- Avoid the entry of suspended sediment and associated nutrients into surface waters from excavation and earthworks;
- Provide a buffer against direct pollution of surface waters by pollutants such as hydrocarbons; and,
- Provide a buffer against construction plant and materials entering any watercourse.

General Best Practice Pollution Prevention Measures will also include

- Protection of the riparian zone watercourses by implementing a constraints zone around stream crossings, in which construction activity will be limited to the minimum, i.e. works solely in connection with duct laying at the stream crossing;
- No stock-piling of construction materials will take place within the constraints zone. No refuelling of machinery or overnight parking of machinery is permitted in this area;
- No concrete truck chute cleaning is permitted in this area;
- Works shall not take place at periods of high rainfall, and shall be scaled back or suspended if heavy rain is forecast;
- Plant will travel slowly across bare ground at a maximum of 5km/hr.
- Machinery deliveries shall be arranged using existing structures along the public road;
- All machinery operations shall take place away from the stream and ditch banks, although no instream works are proposed or will occur;
- Any excess construction material shall be immediately removed from the area and taken to a licensed waste facility;
- No stockpiling of materials will be permitted in the constraint zones;
- Silt fencing will be erected on ground sloping towards watercourses at the stream crossings if required.

Mitigation Measures relating to the use and storage of fuels and chemicals in terms of groundwater protection:

- Onsite re-fuelling of machinery will be carried out using a mobile double skinned fuel bowser. No maintenance of construction vehicles or plant will take place along the temporary junction works areas;
- The plant used will be regularly inspected for leaks and fitness for purpose; and,
- Spill kits will be available to deal with accidental spillage.

#### 4.3.1.9 Mitigation Measures for Piling

The proposed mitigation measures designed for the protection of downstream surface water quality and groundwater quality will be implemented at all construction work areas.

- Mitigation measures for sediment control are detailed in **Section 4.3.1.1** and **4.3.1.3**.
- Mitigation measures for the control of hydrocarbons during construction works are detailed in **Section 4.3.1.4**
- Mitigation measures for the control of cement-based products during construction works are detailed in **Section 4.3.1.6**.

Proposed mitigation measures relative to piling works will comprise:

- Where driven piles are used, they will have a cross section without re-entrant angles;
- Strict QA/QC procedures for piling works will be followed;
- Piles will be kept vertical during piling works;
- Good workmanship will be employed during all piling works; and,
- Where required use bentonite seal to prevent upward/downward movement of surface water/groundwater.

#### 4.3.1.10 Mitigation Measures for Protected Areas

The potential for material to enter the downstream protected areas is negligible as mitigation controls as described above will be implemented. These measures include the use of silt fences, silt traps and check dams. Emphasis will also be placed on prevention of hydrocarbon releases to local watercourses.

It can be concluded that with best practice methods adhered to during the construction of the Proposed Development, the potential to affect downstream protected areas is not significant.

### 4.3.2 Operational Phase

#### 4.3.2.1 Increased Site Runoff and Hydromorphology Effects

Mitigation by Design:

The operational phase drainage system will be installed and constructed in conjunction with the road and hardstanding construction work as described below:

- Runoff from individual turbine hardstanding areas will not be discharged into the existing drain network, but discharged locally at each turbine location through settlement ponds and buffered outfalls onto vegetated surfaces;
- Interceptor drains will be installed up-gradient of all proposed infrastructure to collect clean surface runoff, in order to minimise the amount of runoff reaching areas where suspended sediment could become entrained. It will then be directed to areas where it can be re-distributed over the ground by means of a level spreader;
- Swales/road side drains will be used to collect runoff from access roads and turbine hardstanding areas of the site, likely to have entrained suspended sediment, and channel it to settlement ponds for sediment settling;

- On steep sections of access road transverse drains ('grips') will be constructed where appropriate in the surface layer of the road to divert any runoff off the road into swales/road side drains;
- Check dams will be used along sections of access road drains to intercept silts at source. Check dams will be constructed from a 4/40mm non-friable crushed rock;
- Settlement ponds, emplaced downstream of road swale sections and at turbine locations, will buffer volumes of runoff discharging from the drainage system during periods of high rainfall, by retaining water until the storm hydrograph has receded, thus reducing the hydraulic loading to watercourses; and,
- Settlement ponds will be designed in consideration of the greenfield runoff rate.

#### 4.3.2.2 Surface Water Quality from Site Maintenance

- Onsite re-fuelling of normal operational vehicles machinery will not be carried out during the operational phase of the development. These vehicles All plant/machinery will be refuelled offsite;
- Fuels stored on site will be minimised and any hydrocarbons stored on-site will be bunded. The bund capacity will be sufficient to contain 110% of the storage tank's maximum capacity;
- The substation will be bunded appropriately to the volume of oils likely to be stored, and to prevent leakage of any associated chemicals and to groundwater or surface water. The bunded area will be fitted with a storm drainage system and an appropriate oil interceptor;
- Oil in the turbine transformers will be fully bunded within the enclosed turbine and as such, there is no potential pathway to the water environment i.e. the pathway has been blocked;
- Any plant used during the operational phase will be regularly inspected for leaks and fitness for purpose; and,
- Spill kits will be available to deal with accidental spillages.

#### 4.3.2.3 Mitigation Measures for Protected Areas

The mitigation measures to protect against poor quality runoff during the operational phase of the Proposed Development are the same as those outlined in **Section 4.3.1.1** above.

Mitigation measures for oils and fuels during the operational phase of the Proposed Project the same as those outlined in **Section 4.3.1.4** above.

It can be concluded that with best practice methods adhered to during the operation phase of the Proposed Development, the potential for the project to impact downstream protected areas is not significant.

### 4.3.3 Decommissioning Phase Potential Impacts

#### Wind Farm Site

In the event of decommissioning of the Wind Farm Site, similar activities to the construction phase are carried out.

Potential impacts would be similar to the construction phase but to a lesser degree. There would be increased trafficking and an increased risk of disturbance to underlying soils at the Wind Farm Site, during the decommissioning phase, in this instance, leading to the potential for silt laden run-off entering receiving watercourses from the wheels of vehicles. Any such potential impacts would be likely to be less than during the construction phase as the drainage swales would be fully mature and would provide additional filtration of runoff. Any diesel or fuel oils stored on site would be bunded. In the event of decommissioning of the Umma More Wind Farm, the proposed access tracks may be used in the decommissioning process.

Following decommissioning of the Wind Farm Site, turbine foundations, hardstanding areas and site tracks will be rehabilitated, i.e. left in place, covered over with local soil/subsoil and allowed to re-vegetate naturally, if required. The internal site access tracks may be left in place, subject to agreement with Westmeath County Council and the landowner. It is considered that leaving these areas in-situ will cause less environmental damage than removing and recycling them.

Removal of this infrastructure would result in considerable disturbance to the local environment in terms of disturbance to underlying soils and an increased sedimentation (if turbine foundations, access tracks and hardstandings are being reinstated there is a risk of silt laden run-off entering the receiving watercourses), erosion, dust, noise, traffic and an increased possibility of contamination of the local water table. However, if removal is deemed to be required all infrastructure will be removed with mitigation measures similar to those during construction being employed.

It is proposed that underground cables will be cut back and left in place.

The onsite substation will remain in place as it will be under the ownership of the ESB. There are no impacts associated with this.

#### **Grid Connection Route**

The cabling along the Grid Connection will also remain in place and as such there will be no impacts associated with this.

#### **4.3.4 Potential Effects with the Implementation of Mitigation**

In all instances, the mitigation measures described in **Section 4.3** are sufficient to meet the WFD Objectives of each of the screened in Surface Water Bodies and Groundwater Bodies. The assessment of WFD elements for the WFD waterbodies is summarised in **Table L** below.

**Table L: Summary of WFD Status for Unmitigated and Mitigated Scenarios**

SWB	WFD Code	Current Status (2016-2021)	Assessed Potential Status Change - Unmitigated	Assessed Status with Mitigation Measures
Dungolman_030	IE_SH_26D060400	Poor	Bad	Poor
Inny_110	IE_SH_26I011400	Moderate	Moderate	Moderate
Ballynagrenia Stream_010	IE_SH_25B160400	Poor	Poor	Poor
Ballynagrenia Stream_020	IE_SH_25B160600	Good	Good	Good
Gageborough_020	IE_SH_25G010300	Good	Good	Good
Gageborough_030	IE_SH_25G010500	Good	Good	Good
Brosna_070	IE_SH_25B090450	Good	Good	Good
Tonaphort_010	IE_SH_25T450930	Moderate	Moderate	Moderate
Durrow Abbey Stream_010	IE_SH_25D120200	Poor	Poor	Poor
Silver (Tullamore)_020	IE_SH_25S030100	Good	Good	Good
Silver (Tullamore)_030	IE_SH_25S030300	Good	Good	Good
Tullamore_030	IE_SH_25T030300	Poor	Poor	Poor
Inny GWB	IE_SH_G_110	Good	Good	Good
Clara GWB	IE_SH_G_240	Good	Good	Good
Gageborough-Brosna Gravels Group 1 GWB	IE_SH_G_253	Good	Good	Good
Kilbeggan Gravels GWB	IE_SH_G_242	Good	Good	Good
Tullamore GWB	IE_SH_G_232	Good	Good	Good

## 4.4 CUMULATIVE ASSESSMENT

### 4.4.1 Construction Phase

A detailed cumulative assessment has been carried out for all planning applications (granted and awaiting decisions) within a combined river sub-basin zone within the vicinity of the Wind Farm Site. This combined sub basin area encompasses the area of the Inny[Shannon]\_SC\_090 sub catchment. There will be no potential for cumulative impacts beyond Inny[Shannon]\_SC\_090 due to increases in flow volume (as the catchment area increases) and increasing distance from the Proposed Development. A further assessment has been completed within a 2km buffer zone of the turbine locations and within a 200m buffer zone of the proposed underground electrical cabling connection route. Due to the narrow nature of the underground electrical cabling connection trench (~0.6m wide), a 200m buffer zone is an appropriate scale when considering potential cumulative effects on the water environment.

A total of 419 planning applications have been identified within the sub-basin zone. More than 95% of these applications are for new dwellings or renovations of existing dwellings, as well as for the erection of farm buildings. The other non-dwelling/farm related planning applications include 1 no. planning applications for a replacement of a 15m telecommunications pole with a 21m telecommunications pole (PL 21656) near Ballymore and an above ground water storage reservoir (3150m<sup>3</sup>) is also included in the assessment (PL 187011). The planning applications have been reviewed based on their type, scale and proximity to the Wind Farm Site. Based on the scale of the works, their proximity to the Proposed Development and the temporal period of likely works, no cumulative effects will occur as a result of the Proposed Development.

A desk study of planning applications within 200m of the underground electrical cabling connection route was undertaken. 81 no. planning applications were identified during this study. Again, the majority of applications relate to the construction or renovation/extension of domestic dwellings, which would be considered to be separate to and distinct from, the proposed underground electrical cabling connection in terms of their hydrological significance and potential effects.

3 no. solar farms were identified within Offaly/Westmeath situated within 200m of the proposed underground electrical cabling connection. These include a 10 year permission for a solar farm on lands adjacent to the N52 near the townland of Gormagh (PL 22387), a 10 year permission for a solar energy farm at Dawn Meats near Kilbeggan (PL 22350) and a 10 year planning permission for the construction of a solar farm in the townland of Derries, Co. Offaly, of which the approved underground electrical cable is situated within 200m of the underground electrical cabling route of the Proposed Development. As the construction of the underground electrical cabling connection will be a relatively short construction project, which will be broken up into sections of ~100m works length (meaning that only ~100m of open trench will exist at any one time during the construction), the potential for cumulative effects with these nearby energy developments are not significant from a hydrological/hydrogeological perspective. It is also likely that the construction phases of these projects will not overlap temporally with the construction phase of the Proposed Development, within the buffer zone.

In terms of hydrological cumulative impacts arising from the proposed Wind Farm Site infrastructure and the Grid Connection underground electrical cabling route, none are anticipated as the proposed underground electrical cabling connection route is along the carriageway of public roads and there are no proposed in-stream works at any of the watercourse crossing locations as all the proposed 34 no. crossing locations along the underground electrical cabling connection route are at existing bridges or culverts.

Minor haul route works are required at 7 no. locations however all proposed road widening works are small scale and localised, therefore cumulative effects will not occur.

#### **4.4.2 Operational Phase**

During the operational phase of the Proposed Development, the main sources of potential environmental effects will not exist. There will be no exposed excavations and spoil storage areas will not be in operation. There will be no sources of sediment to reach watercourses. There will be no use of cementitious materials. Fuels/oil will be kept to a minimum at the site. Any oils for turbine maintenance will be stored within bunded areas.

The underground electrical connection cabling route will be backfilled at the end of the construction phase and will remain in-situ during the operational phase. No maintenance of the electrical cabling is envisaged; however any minor maintenance will be completed from inspection points along the route.

During the operational phase of the Proposed Development, there will be no cumulative effects with other planned projects within the sub-basin catchment zone or along the underground electrical cabling route (200m buffer).

## 5. WFD ASSESSMENT CONCLUSION

WFD status for SWBs (Surface Water Bodies) and GWBs (Groundwater Bodies) hydraulically linked to the Proposed Development are defined in **Section 2** above.

The Proposed Development does not involve any abstraction of groundwater or significant alteration of drainage patterns. Therefore, the quantitative status (i.e., the available quantity (volume) of groundwater and surface water locally) to the receiving waters will remain unaltered during the construction and operational phase of the Proposed Development.

There is no direct discharge from the Proposed Development site to downstream receiving waters. Mitigation for the protection of surface water during the construction, operation and decommissioning phases of the Proposed Development will ensure the qualitative status of the receiving waters will not be altered by the Proposed Development.

There is also mitigation proposed to protect groundwater quality during the construction, operational and decommissioning phases of the Proposed Development. These mitigation measures will ensure the qualitative status of the underlying GWB will not be altered by the Proposed Development.

There will be no change in GWB or SWB status in the underlying GWB or downstream SWBs resulting from the Proposed Development. There will be no change in quantitative (volume) or qualitative (chemical) status, and the underlying GWB and downstream SWBs are protected from any potential deterioration.

In the event where the current status of the waterbody is Poor (i.e. Dungolman\_030, Ballynagrenia Stream\_010, Durrow Abbey Stream\_010 and Tullamore\_030) the Proposed Development will not prevent them from achieving Good Status in the future.

As such, the Proposed Development:

- will not cause a deterioration in the status of all surface and groundwater bodies assessed;
- will not jeopardise the objectives to achieve 'Good' surface water/groundwater status;
- does not jeopardise the attainment of 'Good' surface water/groundwater chemical status;
- does not jeopardise the attainment of 'Good' surface water/groundwater quantity status;
- does not permanently exclude or compromise the achievement of the objectives of the WFD in other waterbodies within the same river basin district;
- is compliant with the requirements of the Water Framework Directive (2000/60/EC); and,
- is consistent with other Community Environmental Legislation including the EIA Directive (2014/52/EU), the Habitats Directive (92/43/EEC) and the Birds Directive (2009/147/EC) (Note that a full list of legislation complied with in relation to hydrology and hydrogeology is included in Section 9.1.4 of EIAR Chapter 9).

\* \* \* \* \*

## 6. REFERENCES

Department of Housing, Local Government and Heritage (2024). Water Action Plan 2024. A River Basin Management Plan for Ireland.

Environmental Protection Agency (2024). Cycle 3: HA 26F Upper Shannon Catchment Report.

Environmental Protection Agency (2024). Cycle 3: HA 25A Lower Shannon Catchment Report.

Water Framework Directive "catchments.ie" Map Viewer ([www.catchments.ie](http://www.catchments.ie)).

### Directives and Legislation

Council Directive (76/160/EEC) Bathing Water and revised (2006/7/EC).

Council Directive 91/676/EEC concerning the protection of waters against pollution caused by nitrates from agricultural sources (Nitrates Directive).

Council Directive 91/271/EEC of 21 May 1991 concerning urban waste-water treatment.

Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption.

Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy.

Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014, amending Directive 2011/92/EU of the European Parliament and the Council of 13 December 2011 on the assessment of the impacts of certain public and private projects on the environment.

S.I. No. 293/1988: Quality of Salmon Water Regulations.

S.I. No. 722/2003 – European Communities (Water Policy) Regulations 2003.

S.I. No. 268/2006 - European Communities (Quality of Shellfish Waters) Regulations 2006.

S.I. No. 9/2010 - European Communities Environmental Objectives (Groundwater) Regulations 2010, as amended.

S.I. No. 272/2009 - European Communities Environmental Objectives (Surface Waters) Regulations 2009, as amended.

S.I. No. 350/2014 - European Union (Water Policy) Regulations 2014.

S.I. No. 351/2011 - Bathing Water Quality (Amendment) Regulations 2011.

S.I. No. 477/2011 - European Communities (Birds and Natural Habitats) Regulations 2011.

© **HYDRO-ENVIRONMENTAL SERVICES**

22 Lower Main Street, Dungarvan, Co. Waterford, X35 HK11  
T: +353-(0)58-441 22 F: +353-(0)58-442 44 E: info@hydroenvironmental.ie

[www.hydroenvironmental.ie](http://www.hydroenvironmental.ie)