



APPENDIX 2-1

**COOLE GRID CONNECTION
FURTHER INFORMATION
REQUEST**



REGISTERED POST

Coole Wind Farm Ltd
c/o J Green
MKO
Tuam Road
Galway H91 VW84

20/6121
17 July, 2020

Planning and Development Regulations 2001 as amended

DEVELOPMENT: A 10 year permission to upgrade, reorientation and expansion of previously permitted electricity substation granted as part of Coole Wind Farm (Pl. Ref 17/6292; ABP Ref PL25M/300686) in the townland of Camagh (Fore by). The laying of underground cabling predominantly along the public road corridor to facilitate the connection to the national grid of the permitted wind farm along a route measuring approximately 26.4 kilometres, through the townlands listed below, between the proposed substation in the townland of Camagh (Fore by) and the existing Mullingar 110kV substation in the townland of Irishtown (Moyashel and Magheradernon by). Works to complete the cable connection to the existing Mullingar 110kV electricity substation including the construction of a dedicated bay within the existing substation compound in the townland of Irishtown (Moyashel and Magheradernon by). All associated site works and ancillary development. An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development.

LOCATION: Camagh (Fore by), Monkstown, Coole, Fearnmore (Fore by), Newtown (Fore by), Mayne, Simonstown (Fore by), Ballinealoe, Shrubbywood, Clonava, Lackan (Corkaree by), Soho, Ballynaclonagh, Abbeyland, Rathganny, Ballindurrow, Cullendarragh, Culleenabohoge, Ballynafid, Knightswood, Portnashanagan, Culleen More, Farranistick, Irishtown (Moyashel and Magheradernon by) Co Westmeath

A Chara,

With reference to the above application I am to inform you that the information submitted is not adequate to enable a decision to be made.

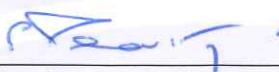
In accordance with Article 33, Planning and Development Regulations 2001, as amended, you are hereby requested to submit the further information as set out on the attached page. The information requested is essential in order to fully assess the proposal.

It is very important to note that if the information requested in this notice, or any subsequent request for clarification, is not received by the planning authority within a period of six months from the date of this request, then this planning application will be deemed to be withdrawn in the absence thereof.

Note:

When responding to this further information request, you are requested to submit at least **two** copies of **all** documentation.

Mise, le meas,



Planning.

Request for Further Information

20/6121

The applicant is requested to submit the following further information in order to assist the Planning Authority in further assessing the merits of this application.

1. The Department of Culture, Heritage and the Gaeltacht have, in their submission of the 25th June 2020, raised several concerns in respect of the EIAR submitted in respect of the proposed development. Accordingly, the applicant is requested to submit a response to the issues set out in this submission and address the following:

(i) It is noted that the EIAR data refers to surveys carried out over 2 days within the winter months and to additional survey work which is considered to be out of date for the purposes of assessing this application. Applicant is requested to provide updated surveys for same and address current limitations in respect of identifying signs of presence, absence or frequency and time of year which is integral to the outputs of these field surveys.

(ii) Applicant to ensure that all surveys are undertaken within the appropriate time, most notably in relation to strictly protected Annex IV species such as Otter and Bat species.

(iii) Applicant is requested to provide further clarity in respect of peat depth surveys undertaken and the impacts of hydrology arising from the development proposed and address the following:

- a) The EIAR indicates that the installation will be within the road or verge of the road. Peat depths are recorded from 0.82 to 5.62metres. It is noted that the cable route is immediately adjacent to Lough Derravaragh NHA (000684) along two sections of the route and adjacent to Ballinafid lake and fen proposed NHA. The most northerly section at Lough Derravaragh is adjacent to raised bog habitat within the NHA, which includes part of Garriskil Bog SAC. Having regard to this, the applicant is required to address whether there will be an impact from the construction works on the hydrology of the NHA & pNHA from the excavation of peat and permanent installation of materials. The applicant is further requested to clarify whether the development works proposed will create a barrier to the hydrology post construction.
- b) Applicant is requested to provide clarity in relation to the excavation material, in terms of transport and storage, including location of the storage compounds and an assessment of the potential for impacts resulting from storage of peat or mineral soils.
- c) Lands associated with the substation site consists of a conifer plantation on peat substrate which may not be suitable for storage of cable route excavations material and rehabilitation of the substation site. Applicant is requested to address this matter for the consideration of the Planning Authority.

(iv) The survey of invasive species which has identified three locations along the cable route where invasive species occur and mitigation measures presented are noted. The applicant is requested to clarify the manner in which all imported material will be checked by a suitably qualified ecologist, having regard to a reference made within the EIA that an ecologist is only present once per month at the substation site and along the cable laying route.

(v) A portion of the road verge habitat includes GS2 Dry Meadows and Grassy Verges. The EIA to assess if any the GS2 habitats, at the appropriate time of year, conform to the EU Annex 1 habitat 'lowland hay meadows' which is given a BAD status in the NPWS (2019) 'The status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS Report.'

(vi) The EIA to assess disturbance to nesting bird species along the hedgerows which align the development proposed.

(vii) The EIA to assess the potential impacts for nesting habitat of bird species in the bridge structures.

2. The Department of Culture, Heritage and the Gaeltacht (Development Applications Unit) have, in their submission of the 25th June 2020 raised concerns in relation to information submitted within the Natura Impact Statement (NIS) submitted. Applicant is requested to address the following:

- a) The NIS cites the Stage 1 screening for appropriate assessment report and concludes that likely significant impacts could not be excluded from following Natura 2000 sites:
- Lough Derravaragh SPA (004043)
 - Lough Iron SPA (004046)
 - Lough Owel SAC and SPA (000688 & 004047)
 - Lough Ennell SAC and SPA (000685 & 004044)

The description of the location of Garriskil Bog SAC (000679) as being sited 60m west of the proposed grid connection is incorrect (refer screening report). A section of Garriskil Bog SAC is within Lough Derravaragh NHA (000684) and the proposed cable route is adjacent to this NHA. The likely significant impacts in terms of hydrological impacts on the NHA require assessment as to whether the project will in turn impact on this section of Garriskil Bog SAC adjacent to the River Inny which is approximately 230 metres from the cable route. Furthermore, Scragh Bog SAC which is sited 300m east of the cable route has been excluded from further assessment on the basis of no source-pathway-receptor chain has been identified.

Applicant is requested to provide clarify on hydrological impacts from the proposed development, if any.

- b) The 'Desktop study Results' description is inaccurate in terms of the location of the cable route with respect to Lough Derravaragh and there is no map provided with the Natura Impact Statement referencing the cable route location to the proximity of the designated sites. Applicant is advised that it is useful to have a

map to illustrate this within the NIS itself rather than referencing the appendix documentation and in this context, the NIS should in essence be a standalone document.

Furthermore, applicant is requested to reference both the Article 12 Birds and Article 17 Habitats reports within the NIS.

The NIS concludes that there will be no direct adverse effects on any European site from the development, however it identifies that indirect adverse effects may be caused to the listed designated sites from deterioration of water quality and disturbance in the SACs and SPA's and presents mitigation measures for these indirect effects.

- c) Concerns are expressed that the mitigation measures presented in Section 5 of the NIS and as outlined in the CEMP, in the appendix, are considered general mitigation measures for the project as a whole. Mitigation measures must be directly linked to the likely impacts identified in the appropriate assessment and can only be defined once the impacts are fully described and assessed.

Full details of mitigation measures to be included in the project description and drawings, with method statements provided. It must be demonstrated that mitigation measures will be delivered in full, and at the appropriate time, at all post-consent stages, and that they will be effective in any specific locations or set of conditions, the necessary analysis should be presented to demonstrate how the mitigation measures will avoid or remove the risks of adverse effects on the integrity of European sites that have been identified in the NIS so that the appropriate assessment is undertaken in the context of the predicated residual effects.

Applicant is requested that the provision of specific mitigation measures to avoid adverse impacts on water quality to the European sites are outlined for each of those locations, for example the water crossings, in order that these may then be specifically included in the CEMP highlighting that these are designed to prevent adverse effects on the specific European site at each location.

Similarly with respect to the disturbance mitigation presented for bird species , the NIS states that, "*Bird species are anticipated to have already habituated to the heavily trafficked road corridor and ongoing peat an agricultural activities in the wider area.*" The mitigation measures specified in Section 5 and the CEMP are general noise related mitigation measures. Applicant is requested that the mitigation measures proposed should be clear, concise and address any cumulative disturbance impact from the development works, such as duration of the works along sections of the road adjacent to the SPAs.

Timing of the work has not been considered in the mitigation with respect to the listed wintering bird species using Lough Derravarragh and surrounding areas, which would avoid potential disturbance. Applicant is requested to address this matter.

3. The proposed cabling extends along approximately 3.5km of national road. The applicant is requested to liaise with TII and the Planning Authority in relation to TII's requirements associated with the laying and re-instating works for the undergrounding of cables along this national road.
4. (a) In the interest of transparency, the applicant is requested to provide the rationale for increasing the size of the substation at Carnagh, which was permitted by An Bord Pleanála under AMP-300686-18 and which is integrally linked to the subject application.
(b) Applicant is further requested to provide clarity by way of highlighting on revised plans all alterations proposed to the previously approved substation at Carnagh and any alterations proposed to Irishtown substation.

Advisory: It is noted that a number of submissions have been received in respect of the proposed development. In this regard, the applicant is invited to review and submit a response to the matters set out therein.

If any submission resulting from the above request alters your original proposal in relation to boundaries, site layout or development location or description, etc. or materially alters design, you must submit a revised newspaper notice and Site notice, the format of which accords with Section 35(1) (a) and (b) of the Planning and Development Regulations 2001 as amended. Please ensure that the format of your notice complies with Article 35 (1) Form 4 of the aforesaid Planning and Development Regulations.

Please note that a planning application shall be declared withdrawn if a request for further information and any subsequent request for clarification has not been complied with within six months of the FIRST request for further information.

Note: The above is not an indication of any commitment on the Planning Authority's behalf to favourably consider your application.

File Ref: 20-6121