

Appendix -1
An Coimisún Pleanála
Further Information
Request

Laurclavagh Renewable
Energy Development



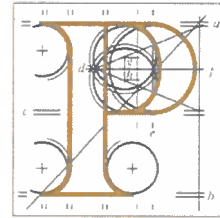


APPENDIX 1

***AN COIMISIÚN PLEANÁLA
FURTHER INFORMATION
REQUEST***

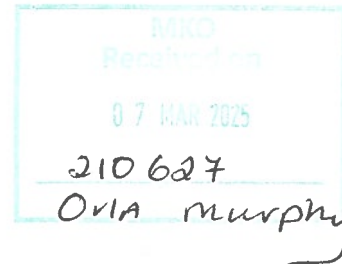
Our Case Number: ABP-319307-24

Your Reference: Laurclavagh Limited



An
Bord
Pleanála

MKO
Planning & Environmental Consultants
Tuam Road
Galway
Co. Galway
H91 VW84



Date: 05 March 2025

Re: Proposed no 8 wind turbines and associated works.
Laurclavagh and adjacent townlands, Co. Galway. (www.laurclavaghplanning.com)

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer further to the above mentioned proposed development which is before the Board for consideration.

Please be advised that the Board, in accordance with section 37F(1)(a) of the Planning and Development Act 2000, as amended, hereby requires you to furnish the following further information in relation to the proposed development:

Item 1. Roads and Traffic (EIAR)

- 1.1 The N83-L61461 junction layout as outlined in submitted plans, the traffic management plan and in your response to submissions do not appear to be consistent with the existing onsite arrangement. The existing junction layout appears to display restricted sightlines in both northerly and southerly directions onto the N83. Given the application details submitted to date and the existing junction layout, consultation should take place with the planning authority in order to clarify the status of the existing junction layout.
- 1.2 You are requested to submit a revised site layout plan at an appropriate scale indicating clear sightline triangles at the required standard including at the N83 & L61461 junction. This shall

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64 Sráid Maoilbhríde	64 Marlborough Street
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clearly dimension the extent of proposed boundary walls to be set back adjoining the L61461 and adjoining the N83. Sightlines at all entrances and junctions should meet required standards.

- 1.3 If required, submit any letter(s) of consent from any adjoining landowner consenting to set back their property in order to achieve sight distances where current sight distance y-splay traverses through adjoining third-party boundary.
- 1.4 Site layout plans should be revised to clearly detail the width of L-61461 and its proposed widened areas, at an increased scale, taking into account the width of 2 number passing HGVs.
- 1.5 The site layout plans should be revised to detail existing junction layouts at the N83-local roads.
- 1.6 The proposed wind farm development would appear to adjoin/encroach onto third party lands adjoining the L61461, with existing dwellings not delineated on the site layout plans at this location. You are requested to provide clarification on same, and submit relevant consents if/where applicable, with plans revised to detail existing dwellings.
- 1.7 The details outlined on material assets in your response to submissions including the management of HGV trips on the L-61461, swept path analysis, new temporary access roads access and egress restrictions, and items raised in items 1.1, 1.2, 1.4 & 1.5 above should be included in an updated Road Safety Audit for the construction stage. This should be outlined by way of an addendum to the EIAR.
- 1.8 A Traffic and Transport Impact Assessment for the N83-L61461 junction encompassing the N83, L61461 and L6146 should be submitted as a standalone document.
- 1.9 Details of the junction capacity test referenced as included as Appendix 15-3 of the EIAR should be submitted.
- 1.10 TII outline the proposals to lay the grid cable in the N83 national road reservation has a potential to impact on road authorities and TII in undertaking future maintenance and improvement requirements, and there also may be additional cost implications to improvements and maintenance resulting from the presence of high voltage cabling. Please outline if joint bays can be accommodated within the N83 carriageway, and their locations should be clearly outlined.

Item 2. Ornithology (EIAR & NIS)

- 2.1 In relation to **the methodology for potential bird mortality and the acceptability of same, the Department of Housing, Local Government and Heritage** consider that both the Ornithology chapter of the EIAR and the NIS do not accurately use the methodology outlined to determine the significance of the potential bird mortality caused by collisions with the proposed turbines. It is

outlined that the EIAR and NIS make reference to the methodology outlined by Percival (2003) for determining the magnitude and significance of an effect on a given population (e.g. High = < 20% population remains, Negligible = < 1% population lost), and according to Percival (2003), the magnitude of impact on a species population as a result of collisions, would be negligible if the estimated mortality does not increase the natural mortality rate of the population by 1%. It is outlined however, Percival (2003) states that *'one issue in this process concerns the precise area or bird population against which the degree of impact should be judged, and for protected SPAs this is usually quite straightforward, comprising simply the populations for which that site has been designated'*. The Department outline the EIAR and NIS only make reference to national and county populations even when connectivity with Lough Corrib SPA has been identified in the reports. It is outlined for example, the reports establish potential connectivity between the proposed development and the Lough Corrib SPA in relation to potential collision mortality impacts on breeding Black-headed Gulls, which are a qualifying interest of the SPA, however, these impacts are then contextualised in terms of county population and not the SPA population as would be the case if the Percival (2003) methodology was used correctly. So instead of an increase of 0.26% mortality in relation to quoted county population there would be a 0.8% increase in mortality in relation to the SPA population. This change, while still resulting in an increase of mortality below 1%, may be important in relation to the assessment of in-combination effects with other wind farms with potential connectivity to the Lough Corrib SPA.

While the details set out in your response to the submissions are noted, having regard to the observations of the **Department Of Housing, Local Government and Heritage**, to enable a determination of the significance of the potential bird mortality caused by collisions with the proposed turbines on all relevant bird species, from both an individual project and cumulative perspective, collision risk impacts should be clearly contextualised in terms of the county and the SPA population, utilising the Percival (2003) methodology, as per the Departments observation.

- 2.2 In relation to **methodology and cumulative impacts**, the **Department of Housing, Local Government and Heritage** outlines the EIAR and NIS both use arbitrary reference areas for assessing the potential in-combination/cumulative effects of collision mortality impacts. It is outlined for example, when considering the potential for the in-combination effects of collision mortality on SCI's of the SPA, such as the Black-headed Gull, arbitrary buffers of 5km and 25km around the proposed development are referenced, and it is recommended that any wind farm with potential connectivity to the Lough Corrib SPA that has similar such impacts should be considered, should they occur, and these may occur at distances much greater than 5km/25km from the proposed development given the size of Lough Corrib SPA. It is outlined if such developments do

not occur or occur but do not result in the mortality of the same qualifying interest species, this should be made clear. The Department also recommends that when considering in-combination effects of other wind farms with connectivity to the same SPA the EIAR and NIS should make reference to any relevant figures in the relevant reports for any such developments and not just their conclusions. It is stated for example if it is established that another wind farm has connectivity with the SPA and it was predicted that this wind farm would have collision mortality impacts on, for example Black-headed Gulls, the predicted number of this collision mortality should be referenced and not just the conclusion. The combined figure should then be interpreted in relation to the population of the relevant SPA.

While the details set out in your response to the submissions are noted, having regard to the observations of the **Department Of Housing, Local Government and Heritage**, to enable for a comprehensive cumulative and in combination assessment of collision risk impacts, details should be outlined for collision risk impacts for all relevant bird species in the county and SPA population, taking into account appropriate buffer distances and other wind farms, with reference also to be made to relevant figures from other wind farm reports, as per the Departments observation.

EIAR

- 2.3 Please outline the cumulative impact on red list species including Hen Harrier, Kestrels and other species using the site of the anthropocentric change of use of the lands over the decades, and this should be quantified.
- 2.4 Please clarify if the existing kestrels and their nesting within an observers lands (E, A, D, and M. Jennings), have been included in the surveys and assessments carried out. These should be revised, if/where applicable.
- 2.5. Please clarify the location of information in Appendices 6-5 and 7-5.

NIS

- 2.6 The NIS outlines that for collision risk estimates for Common Gull (Wintering), that due to the increased population sizes of the species during winter, the collision risk analysis will be **inflated** relative to potential impacts on the **breeding population** which is a designated SCI of the SPA. A collision risk analysis has not been identified for the Common Gull breeding population in tables, this statement should be clarified with details to be outlined in tables, where relevant.

- 2.7 The revised NIS should clarify the potential for the proposed development to give rise to displacement or barrier effects on Common Gull (Breeding). Mitigation should be set out, if/where applicable.
- 2.8 The revised NIS should include an assessment of SCI "Wetlands and Waterbirds" A999 including in section 5.1.2.3.14.
- 2.9 Table 8-1 Wind farm projects within 25km of the Proposed Project should be revised to detail turbine dimensions.
- 2.10 The NIS should be revised to assess the potential impact of turbine obstacle lighting on the relevant European Sites Special Conservation Interests (SCI's).

Mitigation

- 2.11 A number of mitigation measures for key ornithological receptors set out in the EIAR relating to construction timing, the requirement for further surveys for breeding birds, and the fencing off of habitat areas utilised by certain bird species, do not correspond to the mitigation for the same species identified as Special Conservation Interests (SCI's) in the NIS. The revised NIS should include these mitigation measures.
- 2.12 You are requested to clarify if the correct methodology and matrices needed to inform mitigation, have been carried out in the cumulative impact assessment for the EIAR and NIS. Consideration should be given to this issue, with regard given to C-392/96.

Item 3. Bats (EIAR & NIS)

- 3.1 In relation to the biodiversity sections of the EIAR including the survey work undertaken to inform the collision risk assessment for bats, the Bat Report (Appendix 6-2) outlines the calculated activity thresholds were adapted. Please clarify if the bat collision risk analysis was undertaken based on Table 3-6 or 3-7 of the Bat Report. Collision risk analysis should be based on worst case scenarios and the collision risk calculations should be revised, if/where applicable.
- 3.2 Consideration should be given to the potential for bat collision risk from insects being attracted to turbines.
- 3.3 Clarity should be outlined on if the Lesser Horseshoe Bat roosts c.2.3km from Turbine 5 at Caltragh, Belcare. The EIAR outlines the project is outside of the 2.5km foraging range for the species. Clarification should be provided in relation to the presence of any roost site for the species within the foraging range, including within caves, and environmental assessments should be updated, if/where applicable.

- 3.4 An assessment of the potential for the proposal to give rise to effects on **the Lesser horseshoe bat, a QI for the Lough Corrib SAC (000297)** has not been identified in the NIS and this should be addressed.

Item 4. Protected Species, Protected Habitats and Plant Species, Local Species (EIAR)

- 4.1 Clarification should be provided as to whether the site and area includes for any species protected under the flora protection order, and in the event of these species existing, protection measures should be outlined.
- 4.2 The habitat mapping Figure 6-5 (at a scale of 1:23,000) is not clearly legible. Mapping should be outlined at a scale of 1/1250 to enable an assessment of the proposed developments impact on habitats.
- 4.3 Please clarify if there will be any turbine over sailing protected habitats areas. In the event of this occurring an assessment of this impact on protected habitats should be carried out. Mitigation measures should be outlined, if/where applicable.
- 4.4 Please clarify if wake effects will arise from the proposed development on habitats, badgers, species and insects. Consideration should be given to these issues.
- 4.5 The site and its vicinity may include for a range of species, including pine martin, shrews, dormouse, hedgehogs, cuckoo, bull finches, butterfly and larvae, bees, wasps, snails, worms. While the EIAR details the potential for impacts on fauna, e.g. Irish hare, Fox, Irish Stoat, consideration of the effect of the project on the above listed species should be outlined. This should also consider the proposed and revised Biodiversity Management and Enhancement Plan, in Item 5.
- 4.6 You are requested to outline the cumulative impact of the proposed development with the anthropogenic effects of noise on biodiversity.

Item 5. Biodiversity Management and Enhancement Plan (BEMP) – (EIAR)

- 5.1 The referenced Figure 1-1 of the Biodiversity Management and Enhancement Plan (BEMP) which includes habitats clearance areas has not been identified and this should be outlined. The clearance areas should be clearly outlined in the context of existing hedgerow, treelines and woodland, and proposed hedgerow and woodland replanting, on mapping scale of 1:2500.
- 5.2 You are requested to detail the removal of vegetation proposed, including woodland and hedgerow species, which may include hazel groves, oak, ash, hawthorn. Please clarify the specific species to be removed, and the specific replanting to occur in relation to any species removal. This should be clearly outlined on site layout plans and in BEMP mapping.

- 5.3 The EIAR makes reference to the BMEP entailing native woodland planting and these areas should be outlined in the BEMP.
- 5.4 You are requested to clarify if there are ancient woodlands within the site and these and treatments of same should be outlined in the BEMP. This should be outlined on plans and in the BEMP mapping.
- 5.5 Clarity should be outlined on the removal of vegetation and its carbon storage provision. Calculations should be outlined in relation to the carbon storage lost from the proposed removal of vegetation, and from carbon storage anticipated to be attained at the post consent stage following proposed replanting. *Mitigation measures should be outlined for the above Biodiversity items, if/where applicable.*

Item 6. Grid Connection (EIAR & NIS)

- 6.1 The design methodology for the grid connection crossings in the EIAR is not consistent with that set out in the NIS. The EIAR outlines the River Clare crossing at the site of the Lough Corrib SAC will be via Horizontal Directional Drilling (HDD), with the NIS outlining the River Clare crossing is via an existing bridge crossing. Clarification is sought on the river crossings proposed, and this should be addressed in environmental assessments, where appropriate, and in relevant drawings, sections.
- 6.2 Site layout plans should be revised to detail the location of all HDD locations, and these should be outlined relative to local drainage and water courses.
- 6.3 Potential noise and vibration effects of the HDD on all relevant species should be outlined for any HDD crossing.
- 6.4 A schematic of Water Crossing WC1 Type A using standard trefoil formation for the Claretuam Bridge on the N83 should be outlined, if /where applicable.
- 6.5 Cross profiles of all water crossing locations indicating watercourses, riverbanks should be outlined.
- 6.6 Clarify if any instream works are proposed.
- 6.7 Please be advised that TII have made an observation on the design methodology on water crossings for the proposed grid connection. TII recommends for water crossing WC1 (Claretuam Bridge) the existing freeboard should be preserved to allow for increasing the size of drainage culverts to provide additional capacity and accommodate additional water flows as required, and consider a HDD crossing (Option D) of WC1 should be deployed as opposed to Option A. While your response to submissions outlines the proposed watercourse crossing methodologies are deemed appropriate, given the design methodology concerns of TII a detailed response for the proposed water crossing at WC1 should be outlined.

Item 7. Shadow Flicker (EIAR)

- 7.1 You are requested to provide clarification on the shadow flicker calculations for dwellings presented in the EIAR given the details outlined for dwelling H075 in Table 5-10 Maximum Potential Daily & Annual Shadow Flicker. Calculations should include all dwellings within the study area including H213.
- 7.2 Please confirm if the shadow flicker software utilised in the EIAR has been validated.

Item 8. Water (EIAR & NIS)

- 8.1 You are requested to outline the design capacity of the attenuation and infiltration devices for the management of construction waters and storm water management. Calculations addressing storm water runoff should be clearly outlined.
- 8.2 The NIS outlines the same mitigation to prevent significant impacts on water quality during construction is likely to be applicable to the decommissioning phase. The NIS should be revised to outline the mitigation measures that shall apply at decommissioning stage.

Item 9. Noise and Vibration (EIAR)

- 9.1 You are requested to clarify if the wind farm noise calculations are based on collective / standalone turbines.
- 9.2 Consideration should be given to seismic effects, seismic effects and infrasound from the karstic limestone spindles vibration, impacts of vibration on property.

Item 10. Wake effects (EIAR)

- 10.1 Please clarify if turbine wake effects would arise at dwellings, lands downwind of site due to prevailing winds, and also give consideration to wake effects on yields, livestock, and local temperature effects arising.

Item 11. Cultural Heritage (EIAR)

- 11.1 The Department of Housing, Local Government and Heritage outline underwater cultural heritage represented within the proposed development area may encompass riverine heritage structures and features that lie within rivers/streams and on their banks. In light of potential for the

development to have adverse effects on underwater cultural heritage, a programme of pre-construction underwater archaeological assessment should be undertaken as follows:

Submit an Underwater Archaeological Impact Assessment (UAIA) to include:

- 11.2 A desktop assessment that addresses the underwater cultural heritage (including wrecks, archaeological objects, built heritage, riverine and industrial heritage) of the proposed development area.
- 11.3 The UAIA shall include a licensed dive/wade assessment accompanied by handheld metal detection survey centred on any area where works are proposed to the foreshore, to be undertaken by suitably licenced and experienced underwater archaeologist.

Item 12. Landscape (EIAR)

- 12.1 You are requested to consider the impact on historical landscape value and the proposals compatibility with the European Landscape Convention 2004, with attention paid to the Landscape Directive.

Item 13. Other Matters (EIAR & NIS)

- 13.1 In relation to blasting, the Noise and Vibration, and Land, Soil and Geology chapters of the EIAR, and the AA Screening Report and NIS should be updated to confirm no blasting is to occur at construction stage, as outlined in your response to the submissions.

EIAR

- 13.2 Relevant EIAR chapters including Noise and Vibration, Land, Soil and Geology, Water should be updated, by way of addendum to the EIAR, to clearly detail the proposed developments compliance with Gas Networks Irelands guidelines given the siting of the proposed development relative to the gas pipeline.
- 13.3 Clarity should be outlined on the weight of the transportation loads traversing the gas pipeline at construction stage. While details submitted outline the internal roads which will cross over the pipeline have been designed in accordance with the GNI Code of Practice and design specifications requested, these GNI design specifications requirements should be clearly outlined on plans, and the proposed vehicle weight loadings to be accommodated at these locations relative to GNI required specifications should be outlined.

- 13.4 Treatments /recycling of turbine blades at post decommissioning stage should be outlined.
- 13.5 Technical chapters of the EIAR should be updated by way of an addendum to detail the volumes of wastes arising, where applicable.
- 13.6 Clarify if SF6 gas is to be used as an insulant for electrical equipment. Relevant safeguards should be outlined, if/where applicable.
- 13.7 The grade of aggregate, steel and concrete utilised should be outlined for the proposed development.
- 13.8 All EIAR chapters should clearly outline the indirect/potential indirect effects arising, which should be addressed by way of an addendum.
- 13.9 The Interactions chapter, EIAR Non-Technical Summary, CEMP and relevant plans should be updated by way of an addendum to take the request for further information into account, where applicable.
- 13.10 Please clarify details in relation to the project site size (in hectares) and proposed turbine co-ordinates outlined.
- 13.11 Consideration should be given to potential impacts on equine facilities/businesses/breeding operations, arising from the construction stage impacts and siting of the wind farm. Please provide a map delineating existing equine facilities/businesses/breeding operations in the vicinity of the proposed wind farm site. You are requested to also provide an assessment as to whether significant impacts will arise from the proposed development on such facilities, which is to include horse and Connemara Pony breeding operations, and this should take into account guidance in British Horse Society 'Wind Turbines and Horses – Guidance for Planners and Developers' 2015.
- 13.12 Please clarify if the proposed development would impinge on access to lands under folio GY45478. Mapping and ownership details for this area of the site/lands under the control of the applicant should be outlined. In the event of any access being impinged, relevant consents should be outlined, if/where applicable.

NIS

- 13.13 The NIS has referred to Appendix 6-1 of the EIAR which relates to a botanical survey. This appendix should be included within the NIS appendices. EIAR documentation referenced within the NIS should be included in the NIS documentation.

Item 14. Response Format & Timeframe

14.1 The above points of further information should be addressed by way of an addendum to the EIAR, and a revised NIS including the AA Screening Report as relevant and should clearly indicate where changes to the original documents are made. The Traffic and Transport Impact Assessment should comprise a standalone document.

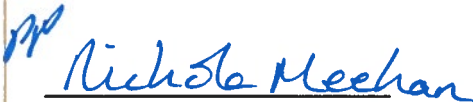
The further information referred to above should be received by the Board within 6 months from the date of this notice (**i.e. no later than 5.30pm on the 6th of September 2025**)

In this regard, please submit 2 hard copies and one electronic copy of the above information.

Please note that following its examination of any information lodged in response to this request for additional information, the Board will then decide whether or not to invoke its powers under section 37(F)(2) of the Planning and Development Act 2000, as amended, requiring you to publish notice of the furnishing of any additional information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Board.

If you have any queries in relation to the matter, please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Raymond Muwaniri
Executive Officer
Direct Line: 01-8737125
PA11

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