

## **Response to Further Information**

Laurclavagh Renewable  
Energy Development



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# 1. INTRODUCTION

1.1.1 MKO have been instructed by our client, Laurclavagh Limited, (the Applicant) to prepare this report in response to a Further Information Request (FIR) issued by An Coimisiún Pleanála (ACP Pl. 319307-24) on 5<sup>th</sup> March 2025. The Response to Further Information (RFI) is being made regarding a proposed renewable energy development which will comprise 8 no. wind turbines and associated infrastructure in the townland of Laurclavagh and adjacent townlands near Tuam, Co. Galway. The Applicant is seeking a 10-year planning permission and a 30-year operational life. This application was submitted on 15<sup>th</sup> March 2024 (ACP Pl. 319307). The application meets the threshold for wind energy set out in the Seventh Schedule of the Planning and Development Act 2000, as amended, on foot of a notice issued by An Coimisiún Pleanála and was therefore submitted directly to An Coimisiún Pleanála as a Strategic Infrastructure Development (SID) in accordance with Section 37E of the Planning and Development Act as amended.

The Proposed Development description as set out in the public notices is as follows:

*“The proposed development will consist of the provision of the following:*

- i. 8 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations, hard-standing and assembly areas;*
- ii. A thirty-year operational life of the wind farm from the date of full commissioning of the wind farm and subsequent decommissioning;*
- iii. Underground electrical cabling (33kV) and communications cabling;*
- iv. A temporary construction compound;*
- v. A temporary security cabin;*
- vi. A meteorological mast with a height of 30 metres and associated foundation and hard-standing area;*
- vii. A new gated site entrance on the L61461;*
- viii. Junction accommodation works and a new temporary access road off the N83 to the L61461, to facilitate turbine delivery and construction access to the site;*
- ix. Upgrade of existing site tracks/ roads and provision of new site access roads, junctions and hardstand areas.*
- x. Upgrade of the existing L61461;*
- xi. Spoil Management;*
- xii. Site Drainage;*
- xiii. Tree and hedgerow removal;*
- xiv. Biodiversity Enhancement measures (including the planting of natural woodland, hedgerows and species rich grassland for new habitat);*
- xv. Operational stage site signage; and*
- xvi. All ancillary works and apparatus.*

*A ten-year planning permission is sought.”*

The current planning application for the Proposed Development was lodged with An Coimisiún Pleanála on 15<sup>th</sup> March 2024, where it was assigned ACP Planning Reference: 319307-24. On the 28<sup>th</sup> of May 2024, ACP issued a request to respond to Third Party and Statutory Bodies Observations and the local authority report (Galway County Council) respectively in relation to the planning application. The Response to Submission following the Commission’s request was submitted on the 9<sup>th</sup> of August 2024. On the 5<sup>th</sup> March 2025, ACP issued a request in accordance with Article 33 of the Planning and Development Regulations 2001, as amended, which sought Further Information on 14 items. Section 2 of this RFI presents a full response to the individual Further Information items. Section 3 of this RFI presents an Errata Section, which outlines change to the Environmental Impact Assessment Report (EIAR).

## 1.2 Terminology

The terminology of project elements used within this report, remains consistent with the terminology used throughout the original planning application documents including the EIAR and is outlined below.

- The ‘Proposed Wind Farm’ relates to the 8 no. turbines and supporting infrastructure (detailed description provided in Chapter 4 of this EIAR), and it is the subject of this planning application under Section 37E of the Planning and Development Act 2000, as amended.
- The ‘Proposed Grid Connection’ relates to the on-site 110kV substation and temporary construction compound and underground cabling connection to the existing Cloon 110kV Substation. The Proposed Grid Connection will facilitate the connection of the Proposed Wind Farm to the national electricity grid and will be subject of a separate planning application under Section 182A of the Planning and Development Act 2000, as amended.
- The ‘Proposed Project’ for the purposes of this EIAR comprises the Proposed Wind Farm and the Proposed Grid Connection, all of which are located within the EIAR Study Boundary (the ‘Site’) measuring approximately 944 hectares.

2.

## Further Information Request

This section of the RFI addresses each of the individual Further Information (FI) items in detail. It should be read in conjunction with the relevant supporting information enclosed with and/or appended to this report. A copy of the request for Further Information issued by An Coimisiún Pleanála (Formerly, An Bord Pleanála) (ABP Ref. No. 319307-24) has also been enclosed with this RFI as Appendix 1 in the interest of clarity.

The Commission has requested, as part of the Response Format and Timeframe of the FIR that all relevant points of further information be addressed by way of an addendum to the previously submitted Environmental Impact Assessment Report (hereafter referred to as “the EIAR”). As a result of this request, an EIAR Addendum Report (hereafter referred to as “the Report”) is included as Appendix 3 of the RFI and associated appendices have been updated where relevant and are titled EIAR Addendum Appendices.

Similarly, the Commission have requested a revised NIS (here after referred to as “the revised NIS”). The revised NIS is included as Appendix 4 of the RFI, and it includes the AA Screening Report, and associated appendices have been updated where relevant and are titled Revised NIS Appendices.

The Commission has also requested a standalone Traffic and Transport Impact Assessment document. This is included as Appendix 5 of the RFI.

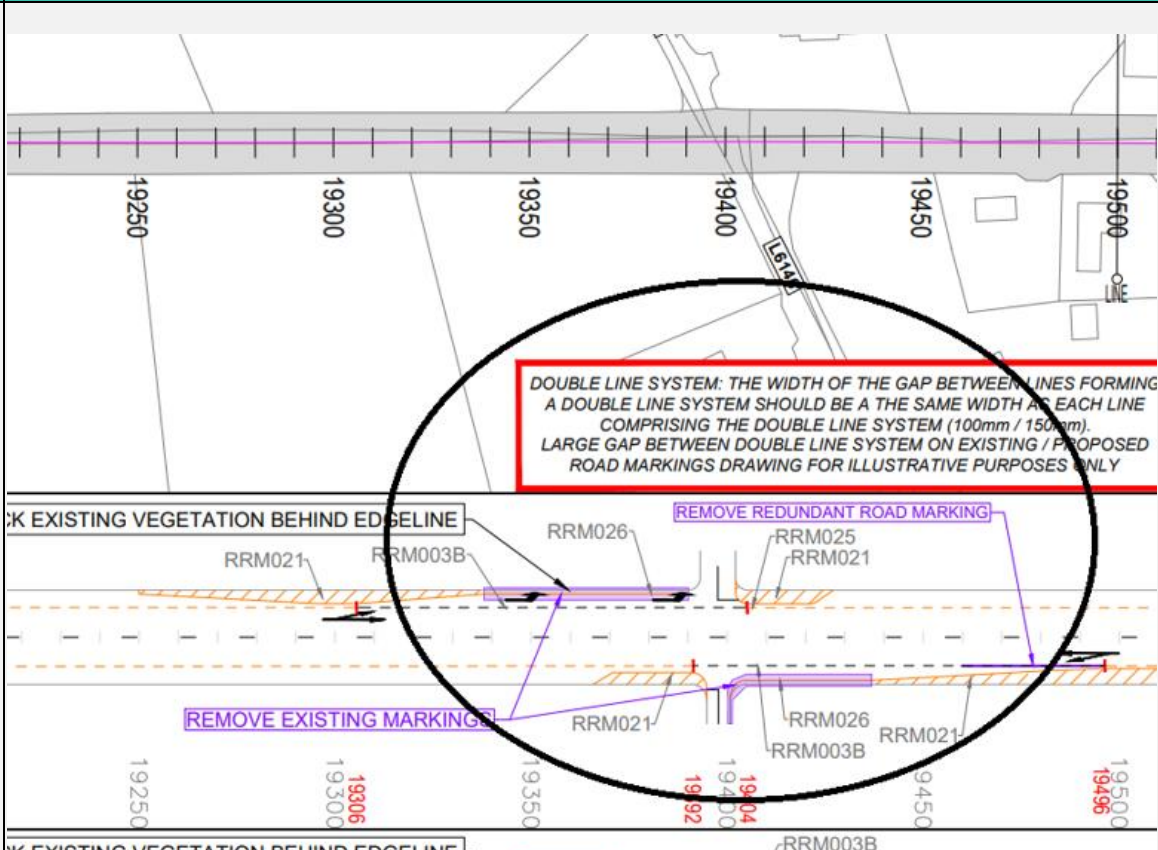
All references to these documents in the table below clearly state where a reference is to a document as submitted, or an updated document which has been provided to The Commission as part of this RFI.

Table 1 Response to ACP Further Information Request

| Further Information Item No.            | Query                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| <b>Item 1. Roads and Traffic (EIAR)</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 1.1                                     | <p><i>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.</i></p> | <p>In agreement with the Commissions observations, it is noted that the road markings on the L61461 minor arm approach to the junction with the N83 have changed in the interim period from when the EIAR was prepared up to the point when the submissions were being responded to. It is considered that the 2 different layouts have little impact on the Proposed Project. As stated in the EIAR, temporary traffic management measures are proposed at this location as mitigation during the critical construction period. A description of the 2 junction configurations is as follows;</p> <p>Layout 1 - In place during the preparation of the EIAR - Stop line extended to carriageway edge to maximise visibility splays for traffic accessing the N83.</p> <p>This configuration is as described in the EIAR, and in the Response to Observations Received Report, with the relevant information now included in the EIAR Addendum.</p> <p>The layout is provided in Appendix 2 Addendum Planning Drawings of this RFI is shown in plan in Figure FI1 in Appendix 15-5 of the Report, with the key points to note for this layout as follows.</p> <ul style="list-style-type: none"> <li>➤ The hard shoulder is discontinued to the north of the junction by means of yellow hatching and to the south before the commencement of the left turn lane that provides access from the N83 onto the L61461.</li> <li>➤ This permits the STOP line to be located adjacent to the carriageway edge, as opposed to the nearside edge of the hard shoulder, and the x-distance for the visibility splays to be measured from the edge of carriageway, as is shown for this layout in Figure FI2 in Appendix 15-5 of the Report. As shown, for this arrangement the full 3m x 215m visibility splays, as are required for a 100 kph speed limit, are available (Reference Geometric Design of Junctions, DN-GEO-03060, TII, May 2023).</li> </ul> <p>It is noted that this junction layout with an extended stop line exists at various other junctions on the N83 in close proximity to the N83 / L61461 junction.</p> |

| Further Information Item No. | Query | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|                              |       | <p>This current configuration of the road markings on the L61461 approach to the N83, which is in place at present (August 2025), is illustrated in Figure FI3 in Appendix 15-5 of the Report. The recently implemented changes to the junction markings have been implemented without any alterations to the boundary walls running parallel to the N83, and as a result, there are significant restrictions to the visibility splays for drivers accessing the N83 from the L61461, as are shown in Figure FI4 in Appendix 15-5 of the Report. Measured from a minimum setback of 2.4m as permitted as a relaxation in TII Guidelines, as a result of the boundary walls now constraining visibility splays, a maximum of 35m is available to the north, and just 20m to the south.</p> <p><b>Consultation with Galway County Council</b></p> <p>As requested by An Coimisiún Pleanála, Galway County Council was consulted in order to establish the reason for the recent change to the junction design and to establish if there were any further long term alterations proposed for the N83 / L61461 junction. A record of the emailed consultations is as follows;</p> <p><u>Galway County Councils Road Section (Robert Lundon)</u> – An email was issued on 18/07/25 requesting clarification with regards the recent changes to the N83 / L61461 junction and clarification of future plans for the junction.</p> <p>A response was received from Robert Lundon on 22/07/25 stating that he was unaware of the issues relating to the junction and suggested that we contact the Area Engineers Office.</p> <p><u>Galway County Council Tuam Local Area Engineers Office (John Coyle / Tom Regan)</u> – The same email was issued to Galway County Councils Tuam Local Area Office (John Coyle) on 24/07/25. An email response was received (Tom Regan) on the same day indicating that the Local Area Office would not deal with issues associated with the N83 / L61461 junction as it is on a National Road. It was suggested that contact be made with the Galway County Council National Road Project Office.</p> <p><u>Galway County Council National Road Project Office (Maire McGrath)</u> – An email was issued to the National Road Project Office (NRPO) on 24/07/25 with a response received from Steven Lally of the NRPO on 07/08/25 stating that TII, through the Donegal NRDO (which looks after signing &amp; road marking) appointed consultants to review the N83 route. As part of that review the location of the STOP line on the</p> |

| Further Information Item No. | Query | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                 |
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|                              |       | <p>L61461 approach to the junction with the N83 was relocated from that shown in Configuration 1, to Configuration 2, as discussed above. A snapshot of the N83 Route Delineation Design drawing provided by Galway County Councils NRPO is inserted as Figure FI5 below.</p> <p><i>Figure FI5 Extract of N83 / L61461 junction with STOP line re-located to nearside of hard-shoulder.</i></p> |

| Further Information Item No. | Query | Response to Further Information                                                                                                                                                                                                                                                                                                                                |
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|                              |       |  <p>It was confirmed by Galway County Councils NRPO that there are no additional long term plans for further alterations to the N83 / L61461 junction.</p> <p>Summary of consultation with Galway County Council in relation to the layout of the N83 / L61461 junction</p> |

| Further Information Item No. | Query                                                                                                                                                                                                                                                                                                                                                                                                          | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|                              |                                                                                                                                                                                                                                                                                                                                                                                                                | <p>It is confirmed that there have been minor alterations made to the layout of the N83 / L61461 junction between the time of the preparation of the EIAR for the Proposed Project, and the date of the preparation of the Response to Observations Received Report, and the preparation of the response to issues raised by the Commission, presented in this report.</p> <p>The changes were implemented by the Donegal NRDO on behalf of TII, and it is confirmed that there are no further changes proposed. It is noted that the recent change to the junction layout, which includes the relocation of the stop line back to the nearside edge of the hard shoulder, does not include a setback of the boundary walls along the N83, which results in visibility for drivers accessing the N83 from the L61461 now being severely constrained. It is also noted, however, that this recently implemented design has been designed and implemented by Donegal NRDO / TII and its consultants, and is therefore accepted by the Applicant.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 1.2                          | <p><i>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 &amp; L61461 junction. This shall 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.</i></p> | <p>It is not proposed to implement any permanent changes to the existing N83 / L61461 junction as part of the Proposed Project. The justification for this is set out below.</p> <p>The traffic generated by the Proposed Project that will pass through the N83 / L61461 junction, together with the proposed traffic management measures proposed as mitigation are set out in Sections 15.1.4 and 15.1.12.5.2 of the EIAR, with further information relating to traffic management measures provided in Section 15.1.12.5.2 of the Report, and summarised as follows;</p> <p><b>Construction period</b></p> <ul style="list-style-type: none"> <li>➤ During the 8 days when concrete foundations will be poured, all concrete mixers accessing the site will turn left off the N83 onto the temporary access link joining the N83 to the L61461 proposed as part of the development and will not travel through the existing N83 / L61461 junction. All cement mixers leaving the site will exit the L61461 onto the N83 at the existing junction, with the assistance of the comprehensive set of temporary traffic management measures set out in 15.1.12.5.2 of the EIAR (including traffic signs, proposed temporary reduction in speed limit, the presence of construction staff, temporary introduction of bollards on the centreline of the N83).</li> <li>➤ For 227 days when general construction materials will be delivered to the site, and for a further 8 days when smaller turbine components will be delivered to the site using standard HGVs, the same traffic</li> </ul> |

| Further Information Item No. | Query | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|                              |       | <p>management measures described previously will be in place, that is, all HGV movements will turn left off the N83 onto the L61461 onto the temporary access link, and when leaving the site will exit the L61461 onto the N83 with the assistance of the same set of traffic management measures.</p> <p>For these days the temporary traffic management measures set out in the EIAR will provide mitigation against the temporary increase in traffic volumes that will pass through the junction, and the existing constraints in visibility splays at the existing junction. These measures will also be in place to facilitate the arrivals and departures of all construction staff traffic (maximum 35 cars to and from the site per day) during the full 18 month construction delivery period.</p> <p>On the 22 nights when the large turbine components will be delivered to the site the 3 abnormally sized loads will access the proposed temporary link road between the N83 and the L61461 to access and exit the site. All deliveries made by abnormally sized vehicles will be accompanied by an escort provided by An Garda Siochana who will provide transient traffic management measures, which will mitigate against the visibility constraints at this location.</p> <p>It is set out in the EIAR and summarised above that for all days during the construction phase of the Proposed Project, during which traffic volumes passing through the N83 / L-61461 junction will be increased, temporary traffic management measures will be in place as temporary mitigation measures.</p> <p><b>Operational stage</b></p> <p>Once operational it is anticipated that there will be 1-2 maintenance staff on site on any given day, typically generating 1 car/lgv trip, or 2 movements per day. With a total of 98 movements forecast on the L61461 by the proposed construction year of 2028, it is considered that the long term impacts of the additional 2 daily trips that will pass through the N83 / L-61461 junction will be imperceptible during the operational stage. It is considered that this minor increase in the additional trips will be accommodated by the junction layout that has recently been modified by Donegal NRDO / TIL.</p> <p><b>Conclusion</b></p> <p>Based on the above, it is considered that the scale of the permanent increase in traffic volumes that will be generated during the operational stage of the Proposed Project does not justify a requirement for the</p> |

| Further Information Item No. | Query                                                                                                                                                                                                                                                        | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|                              |                                                                                                                                                                                                                                                              | Applicant to implement junction improvements at the N83 / L-61461 junction which has recently been altered by TII. The applicant would, however, be approachable to making a proportional contribution to any improvements to the junction that may be considered by Galway County Council / TII.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 1.3                          | <i>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.</i>            | As set out in the response to Item 1.2 above, it is not proposed to provide any improvements to the N83 / L61461 junction as part of the Proposed Project. The proposed mitigation measures outlined in response to the above point ensures that no improvements are necessary during either the construction or operational stages of the Proposed Project. As above, a contribution would be considered for any junction improvement works that may be considered by Galway County Council / TII.                                                                                                                                                                                                                                                                                             |
| 1.4                          | <i>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.</i>                                                             | <p>The proposed temporary widening of the L-61461 is shown in Figure FI6 to a scale of 1:1000 in provided as Appendix 2 Addendum Planning Drawings of this RFI Document at the appropriate scale. The figure shows the sections proposed for road widening, road widths at selected locations, and also a swept path analysis for a large articulated HGV (15.4m long by 2.5m wide).</p> <p>A detailed assessment of the operation of the 340m section of the L-61461 between N83 and the proposed site access junction was provided in Section 2.11 Traffic / Road Safety of the Response to Observations Received Report which is included as Section 15.1.12.5.2 of the Report. Figure FI6 clearly demonstrates that the proposed widening measures will facilitate the passing of HGVs.</p> |
| 1.5                          | <i>The site layout plans should be revised to detail existing junction layouts at the N83-local roads.</i>                                                                                                                                                   | All figures in the EIAR and those included in the Appendix, showing the layout of the N83 / L61461 junction have been updated to include the revised road markings with the STOP line on the L-61461 approach relocated to the nearside of the hard shoulder, and are provided as Appendix 2 Addendum Planning Drawings of this RFI Document. This is addressed in Section 15.1.9 of the Report.                                                                                                                                                                                                                                                                                                                                                                                                |
| 1.6                          | <i>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,</i> | <p>The red line boundary of the Proposed Development that was included in the initial submission encroaches on third party lands at Folio GYI33807F which is adjoining the L61461. Subsequently, the red line boundary has been amended to no longer include any third party lands where consent has not been obtained.</p> <p>It should be noted that the planning permission granted for the property referred to in GCC Pl. Ref. 20/1188 states that:</p>                                                                                                                                                                                                                                                                                                                                    |

| Further Information Item No. | Query                                                                                                                                                                                                                                                                                                                                                                                                                  | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                              | <i>and submit relevant consents if/where applicable, with plans revised to detail existing dwellings.</i>                                                                                                                                                                                                                                                                                                              | <p><i>“A 3 metre deep set back shall be provided immediately adjoining the edge of the margin of the roadway for the entirety of the site frontage. This space shall be cleared, graded, levelled and surfaced to a standard suitable for use as off-road parking to the satisfaction of the Area Engineer and Planning Authority.”</i></p> <p>It is assumed that the above works have been carried out in accordance with the conditions of planning permission outlined above by Galway County Council.</p> <p>All relevant planning and drainage drawings have been updated to show the updated red line boundary and any proposed road widening works. Please refer to Appendix 2 for these updated drawings.</p> |
| 1.7                          | <i>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 &amp; 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.</i> | This issue is addressed in a joint response prepare by the Applicant and the Independent Road Safety Auditors (Traffico Ltd) and is included. This is included as Appendix 15-3a of the <b><i>EIAR Addendum Report</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 1.8                          | <i>A Traffic and Transport Impact Assessment for the N83-L61461 junction encompassing the N83, L61461 and L6146 should be submitted as a standalone document.</i>                                                                                                                                                                                                                                                      | The standalone Traffic and Transport Assessment for the N83 / L61461 / L61461 junction is included as Appendix 5 of this RFI. It is noted that all key conclusions with respect to the capacity of the junction are consistent with those presented in Section 15.1.6.4 of the EIAR.                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Further Information Item No.     | Query                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| 1.9                              | <i>Details of the junction capacity test referenced as included as Appendix 15-3 of the EIAR should be submitted.</i>                                                                                                                                                                                                                                                                                                                                                                  | <p>Due to a typographical error in Chapter 15 Material Assets, it was incorrectly stated the junction capacity test was included as Appendix 15-3 of the EIAR. A detailed junction capacity test was undertaken for the N83 / L61461 junction and was included in Section 15.1.6.4.2 of Chapter 15 of the EIAR. It is noted that this information is now also provided in the Standalone Traffic and Transport Assessment included as Appendix 5 of this RFI Document. It is noted that this information is now also provided in the Standalone Traffic and Transport Assessment included as Appendix 5 of the EIAR Addendum Report.</p> <p>In summary the assessment presents additional details of the junction capacity assessment undertaken for the construction stage of the Proposed Project at the N83 / L-61461 / L-6146 junction, updated to take account of the reduced visibility on the L-61461 junction. A sensitivity test is also presented based on an extreme precautionary scenario of all construction staff and the maximum number of HGVs for a concrete foundation pour passing through the junction at the same time. The junction was determined to operate within capacity for this scenario.</p>                                                                                                                                                                                                                                                     |
| 1.10                             | <i>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.</i> | <p>The Planning Drawings (included in the Planning Pack) are relevant to S37E Application for the Proposed Wind Farm only. Drawings of the Proposed Grid Connection assessed are included in Appendix 4.8: Grid Connection Infrastructure of the EIAR to facilitate ACP to complete a robust EIA of the Proposed Project.</p> <p>Joint bays located in roadways are common features of large scale renewable energy projects in Ireland.. 21 no. joint bays are proposed along the Proposed Grid Connection underground cabling route, approximately 600 to 800 metres apart or as otherwise required by ESB/Eirgrid and electrical requirements. Joint Bays are a crucial part of undergrounding electricity networks, facilitating connections for both Eirgrid and ESB Networks between renewable energy projects and the national grid. They are often located under public roads and are required to be informed by the TII “Specification of Road Works” and other ESB functional specifications. Appendix 4-8 Grid Connection Infrastructure provides details of the proposed locations on joint bays in the public roadway along the Proposed Grid Connection underground cabling route. The final location of all joint bays will be detailed in a separate Planning Application for the Proposed Grid Connection infrastructure, under S.182 of the Act, which will also take into account any observations which TII and other relevant stakeholder may provide.</p> |
| Item 2. Ornithology (EIAR & NIS) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Further Information Item No. | Query                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| 2.1                          | <p><i>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 = &lt; 20% population remains, Negligible = &lt; 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</i></p> | <p>An Coimisiún Pleanála (ACP) issued a further information request that makes specific reference to the 2024 submission of the Department. As the submission by the Department is central to the further information request, it is summarised in the following paragraphs. It is noted that a response to this 2024 submission was submitted on the 9<sup>th</sup> of August 2024. ACP note this response to submissions. This response has been prepared by Principal Ornithologist, Pdraig Cregg (B.Sc., M.Sc.) with assistance from Senior Ornithologist Donnacha Woods (B.Sc., M.Sc.) of MKO, both of whom are suitably qualified, competent, professional ornithologists with extensive experience in completing avifaunal assessments and are competent experts for the purpose of the preparation of this response.</p> <p>The Department’s key concern (from the 2024 submission) related to the potential for an important cumulative collision risk for the Special Conservation Interest population of breeding black-headed gulls from the nearby Lough Corrib SPA. The Department criticised the methodology used in the Ornithology Chapter of the EIAR and the NIS to assess bird mortality from turbine collisions. They argue that both reports inaccurately apply Percival’s (2003)<sup>1</sup> methodology for assessing the significance of potential bird fatalities. Percival suggests that an impact is negligible if it does not exceed a 1% increase in natural mortality rate, emphasising the importance of correctly defining the affected bird population. The relevant text includes the following worked example, which illustrates their position:</p> <p><b><i>“For example, the reports establish potential connectivity between the Proposed Development and the Lough Corrib SPA in relation to potential collision however, these impacts are then contextualised in terms of the county population and not the SPA population as would be the case if 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 in 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.”</i></b></p> |

<sup>1</sup>Please see Section 8.2.5.3 of the EIAR for a summary of Percival (2003) guidance.

| Further Information Item No. | Query                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|                              | <p><i>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.</i></p> <p><i>While the details set out in your response to the submissions are noted, having regard to the observations of the <b>Department Of Housing, Local Government and Heritage</b>, to enable a determination of the significance of the potential bird mortality caused by collisions with the proposed turbines on all</i></p> | <p>In summary, the Department highlights how the choice of reference population can impact the outcome of the impact assessment. In the present case, they are primarily concerned with the cumulative impact assessment for black-headed gulls. In the 2024 response to submissions, there was first a discussion of the choice of black-headed gull reference population for the collision risk impact assessment, followed by the cumulative assessment of collision risk. In the 2025 request for further information from ACP, they request the following:</p> <p><b>“To enable a determination of the significance of the potential bird mortality caused by collisions with proposed turbines on <u>all relevant bird species</u>, from both an individual project and cumulative perspective, collision risk impact should be clearly contextualised in terms of the county and the SPA population, utilising the Percival (2003) methodology, as per the Departments observation.”</b></p> <p>The “relevant bird species” mentioned in the ACP FI request is taken to mean any key ornithological receptor as per Section 7.4.2 of the EIAR where that species is also named as a SCI for an SPA with potential connectivity to the site. This is taken to be the case due to the requirement to contextualise “in terms of the county <u>and</u> the SPA population”. An example species would be black-headed gull. As this species was discussed at length in the 2024 response to submissions, it is not discussed further here. There are only two other species that fit this description: golden plover and hen harrier. For golden plover, the choice of reference population for the collision risk impact assessment was first discussed followed by the cumulative assessment of collision risk. Collision risk is then discussed for hen harrier. Please see the Section 7.5 of the EIAR Addendum for detailed discussion.</p> <p>Bird surveying has been ongoing at the Proposed Wind Farm site from October 2023 to March 2025 (data presented in Section 7.3.7.1 of the EIAR Addendum and Appendix 7-2a and 7-4a). The results of these most recent surveys and the previously reported surveys have been combined to inform an updated collision risk assessment. Please see EIAR Addendum Appendix 7-6a for details. The results of this revised collision risk assessment informs this response.</p> <p>Additional information has been provided for relevant species in Sections 7.5.2.1, 7.5.2.2 and 7.5.2.7 of the Report.</p> |

| Further Information Item No. | Query                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|                              | <i>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.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Additional information has been provided for relevant species in Sections 6.1.1.1.5, and 8.1.3.2 of the Revised NIS.                                                                                                                                                                                                                                                                                                                                                                         |
| 2.2                          | <i>In relation to <b>methodology and cumulative impacts, the Department of Housing, Local Government and Heritage</b> 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</i> | <p>Section 7.9.2 of the Report details further information relating to the Assessment of Cumulative Effects on key ornithological receptor species including golden plover, black-headed gull, kestrel, lapwing, snipe and hen harrier.</p> <p>Section 7.9.2 of the revised NIS details further information relating to the Assessment of Cumulative Effects on key ornithological receptor species including golden plover, black-headed gull, kestrel, lapwing, snipe and hen harrier.</p> |

| Further Information Item No. | Query                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Response to Further Information |
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|                              | <p><i>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.</i></p> <p><i>While the details set out in your response to the submissions are noted, having regard to the observations of the <b>Department Of Housing, Local Government and Heritage</b>, 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.</i></p> |                                 |

| Further Information Item No. | Query                                                                                                                                                                                                                                | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| <b>EIAR</b>                  |                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 2.3                          | <i>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.</i>  | Section 7.9.2 of the Report details further information relating to the Assessment of Cumulative Effects on key ornithological receptor species including golden plover, black-headed gull, kestrel, lapwing, snipe and hen harrier.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2.4                          | <i>Please clarify if the existing kestrels and their nesting within an observer's lands (E, A, D, and M. Jennings), have been included in the surveys and assessments carried out. These should be revised, if/where applicable.</i> | Section 7.5.2.10 of the EIAR provides clarification on the inclusion of a kestrel nest site on an observer's land in surveys and the associated impact assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2.5                          | <i>Please clarify the location of information in Appendices 6-5 and 7-5.</i>                                                                                                                                                         | <p>Appendix 6-5 and Appendix 7-5 were both submitted with the Planning Application as printed copies in March 2024. These appendices contain sensitive information relating to breeding, roosting and/or resting places of protected species, which could increase the risk of persecution and/or disturbance if locations are made publicly available. For this reason, the appendices were included in the application as printed copies intended to be available upon request but not to be uploaded to the publicly available planning file.</p> <p>However, Appendix 6-5 and 7-5, as submitted, have also been included in this Response to Further Information for clarity as appendices 6-5a and 7-5a to the Report.</p> |
| <b>NIS</b>                   |                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Further Information Item No. | Query                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| 2.6                          | <i>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 <b>breeding population</b> 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.</i> | <p>Section 7.3.8 of the EIAR provides details on the comprehensive suite of surveys that occurred for the Site. Common gull were effectively absent from the Site during the breeding season. In four years of vantage point surveying, a single bird on a single occasion was recorded during the breeding season</p> <p>Section 7.5.2.7 of the Report details the collision risk effects on breeding common gull, which are SCI species of the Lough Corrib SPA. This is addressed for both the breeding and non-breeding seasons.</p>                                                                                                                                                                                                                                                                                                                                                                                    |
| 2.7                          | <i>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.</i>                                                                                                                                                                                                                                                                                                    | <p>Given that no common gull were recorded using the Proposed Project site within breeding season during the ornithological surveys undertaken, it is evident that the breeding population of the SCI species is not using the Site and that there is no potential for adverse effect to the species via displacement or barrier effects. No mitigation is necessary. This is now reflected in Section 6.2.1.2.5 of the revised NIS.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2.8                          | <i>The revised NIS should include an assessment of SCI "Wetlands and Waterbirds" A999 including in section 5.1.2.3.14.</i>                                                                                                                                                                                                                                                                                                                                                                                        | <p>The potential for the Proposed Project to adversely affect this SCI supporting habitat has been fully assessed in the NIS as submitted. A potential pathway for impact was identified via water quality deterioration of SCI supporting habitat as a result of the Proposed Project. A range of mitigation measures are prescribed in the submitted NIS to block the pathway. However, the revised NIS has been updated in Section 5.1.2.3.14 to include an assessment of the impact of the Project on the individual Targets and Attributes associated with the SCI supporting A999 habitat.</p> <p>Mitigation is provided in Section 6.2.2 of the revised NIS to block the identified pathway for impact on this SCI habitat via water quality deterioration. With the mitigation in place, it is concluded that there is no potential for adverse effect on 'Wetlands and Waterbirds (A999)' of Lough Corrib SPA.</p> |

| Further Information Item No. | Query                                                                                                                                                                                                       | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| 2.9                          | <i>Table 8-1 Wind farm projects within 25km of the Proposed Project should be revised to detail turbine dimensions.</i>                                                                                     | Section 8.1.3 Table 8-1 of the revised NIS has now been updated to include turbine dimensions of other wind farm projects within 25km of the Proposed Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2.10                         | <i>The NIS should be revised to assess the potential impact of turbine obstacle lighting on the relevant European Sites Special Conservation Interests (SCI's)</i>                                          | <p>As some bird species are known to be attracted to artificial lighting (phototaxis), there is potential for some bird species to be put at increased risk of colliding with a turbine if attracted to artificial lighting on turbines. However, some taxonomic groups (e.g., some burrow nesting seabirds) and nocturnally migratory species (especially passerines) are more attracted to lights than others. None of the SCI species associated with nearby European Sites are within these taxa.</p> <p>As detailed in the NatureScot guidance document: <i>Effects of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures</i><sup>2</sup>, it is stated that:</p> <p><i>“It is likely that collision risk at lit turbines for non-passerine taxa are likely to be relatively low in general.”</i></p> <p>This is of note as all of the SCI species recorded on the Proposed Project site are non-passerines. The revised NIS has been updated with an assessment in light of the above in Section 6.2.2.2.3. There is no potential for adverse effect to SCI species of Lough Corrib SPA due to lighting associated with the Proposed Project.</p> |
| <b>Mitigation</b>            |                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 2.11                         | <i>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</i> | It should be noted that the mitigation measures included in the EIAR are not proposed in order to mitigate any identified significant effect. As stated in Section 7.6.2.1 of Chapter 7 of the EIAR:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

<sup>2</sup> <https://www.nature.scot/doc/information-note-effect-aviation-obstruction-lighting-birds-wind-turbines-communication-towers-and>

| Further Information Item No.         | Query                                                                                                                                                                                                                                                                                                             | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|                                      | <i>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.</i>                                                                        | <p><i>“Note that these measures are proposed as industry best practice rather than to mitigate any identified significant effect and will be updated as required to address any conditions of a grant of permission or findings of any pre-construction survey results.”</i></p> <p>It should also be noted that the assessment undertaken in the NIS of the potential for disturbance, displacement, collision risk and habitat loss effects on each of the SCI populations assessed (i.e Hen Harrier, Golden Plover, Common Gull and Black-headed Gull), did not identify any potential for adverse effect to any SCI population. Similarly, the assessment undertaken in Chapter 7 of the EIAR did not identify any potential for significant impact on these species. Therefore, no mitigation to block any identified pathway for adverse effect on populations of species associated with the SPA is necessary. The best practice measures listed in Section 7.6 of the EIAR are included as industry best practice measures rather than being designed specifically to mitigate any identified impact pathway. Notwithstanding this, they are included within the revised NIS in Section 6.2.1.2.7.</p> |
| 2.12                                 | <i>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.</i>                                              | <p>The cumulative impact assessment has been undertaken in accordance with Guidelines on the Information to be Contained in Environmental Impact Assessments (EPA 2022) and European Commission (2021) Methodological guidance on Article 6(3) and 6(4) of the Habitats Directive.</p> <p>Consideration has been given to Case Law C-392-96 with further detail provided in Section 6.6 of the Report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Item 3. Bats (EIAR &amp; NIS)</b> |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3.1                                  | <i>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</i> | <p>As discussed in Section 3.5 of Appendix 6-2 Bat Report of the EIAR, the calculated activity thresholds shown in Table 3-6 of the Bat Report were considerably high for all species surveyed, which would result in bat activity appearing to be low across the site. To provide a more precautionary and representative assessment of bat activity in agricultural grassland habitats, the thresholds were adjusted based on MKO's experience with similar habitat types. The thresholds presented in Table 3-7 have been deliberately reduced to reflect a worst-case scenario, ensuring a conservative approach to assessing potential impacts. Consequently, the bat collision risk analysis was undertaken based on Table 3-7.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| Further Information Item No.                                                          | Query                                                                                                                                                                                                                                                                                                                                                                                                                              | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|                                                                                       | <i>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.</i>                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 3.2                                                                                   | <i>Consideration should be given to the potential for bat collision risk from insects being attracted to turbines.</i>                                                                                                                                                                                                                                                                                                             | The potential for insects and in turn bats to be attracted to turbines has been considered in Section 6.5.3.2.2 of the EIAR Addendum. In addition, an adaptive mitigation and monitoring plan has been designed in line with relevant industry guidance, as outlined in Appendix 6-2, Section 6 of the Bat Report as submitted.                                                                                                                                                                                                                                                                                                                                                                                     |
| 3.3                                                                                   | <i>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.</i> | <p>Lesser horseshoe bat roosts in proximity to the site have been fully considered as part of Appendix 6-2 Bat Report of the EIAR. Lesser horseshoe bat is a low collision risk species, furthermore, a range of mitigation measures to reduce the potential for collision has been implemented as set out in Section 6.1 of the Bat Report as well as an operational monitoring plan. Section 6.5.2.2.4 of the Report contains further information regarding the assessment of Lesser horseshoe bat.</p> <p>Additional detail has been provided in Section 5.1.1.1 Table 5-1 of the revised NIS relating to the potential for adverse effects on the Lesser Horseshoe Bat as a result of the Proposed Project.</p> |
| 3.4                                                                                   | <i>An assessment of the potential for the proposal to give rise to effects on <b>the Lesser horseshoe bat</b>, a QI for the Lough Corrib SAC (000297) has not been identified in the NIS and this should be addressed</i>                                                                                                                                                                                                          | <p>Section 6-5.2.2.4 of the Report contains further information regarding the assessment of the Lesser horseshoe bat.</p> <p>Additional detail has been provided in Section 5.1.1.1 Table 5-1 of the revised NIS relating to the potential for adverse effects on the Lesser Horseshoe Bat as a result of the Proposed Project.</p>                                                                                                                                                                                                                                                                                                                                                                                 |
| Item 4. Protected Species, Protected Habitats and Plans Species, Local Species (EIAR) |                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| Further Information Item No. | Query                                                                                                                                                                                                                                                           | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| 4.1                          | <i>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.</i>                                | <p>As detailed in Section 6.4.1.7 of the EIAR, no species listed under the Flora Protection Order was recorded within the Proposed Project site. However, spring gentian (<i>Gentiana verna</i>), which is classed as Near Threatened in the Red Data List of Vascular Plants, was recorded within the Site on areas of dry calcareous heath and limestone pavement. These areas are completely avoided by the footprint of the Proposed Project. Furthermore, where suitable habitat for this species does occur in proximity to the Proposed Project footprint, mitigation has been prescribed to avoid impact on these habitats as prescribed in Section 6.5.2.1.3 of the EIAR, by means of construction phase fencing as shown on the updated Figures in Appendix 6-7 of the Report.</p> <p>The Proposed Project footprint is restricted to species-poor, improved agricultural grassland. Any high value habitats within the Proposed Project site, which may have potential to support plant species listed under the Flora Protection Order, have been completely avoided by the Proposed Project.</p> |
| 4.2                          | <i>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.</i>                                                 | It is stated in Item 4.2 that the submitted Habitat Map is not clearly legible. A series of updated habitat maps have now been submitted. Figure 1a shows an overall Habitat Map at a scale of 1:15,000. The remaining figures show small-scale sections of the Proposed Wind Farm site at a scale of 1:1250. These maps are provided in Appendix 6-6 Habitat Map Pack of the Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 4.3                          | <i>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.</i> | As described in the Section 15.1.5 of Chapter 15 of the EIAR, turbine delivery within the Proposed Wind Farm site will be via vehicle with total length 86.9m. The potential for oversail of protected habitats including Annex I habitats, hedgerows, treelines and woodlands has been assessed following review of the swept path analysis of turbine delivery within the Proposed Wind Farm site. There will be no oversail of Annex I habitats or woodland habitats. Where oversail of hedgerow or treeline is likely to occur, such trees may be pruned to accommodate the turbine delivery, however, such pruning will be kept to a minimum. There will not be significant loss of hedgerow or treeline habitat within the Proposed Wind Farm site as a result of oversail. Furthermore, as part of the Proposed Project, a 100% net gain is proposed in terms of hedgerow replanting. There is no potential for significant effect to habitats as a result of turbine delivery.                                                                                                                        |
| 4.4                          | <i>Please clarify if wake effects will arise from the proposed development on habitats,</i>                                                                                                                                                                     | The potential for wake effects from turbines to impact fauna has been considered and is detailed in Section 6.5.3.2.3 of the Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Further Information Item No.                                                 | Query                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                         |
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|                                                                              | <i>badgers, species and insects. Consideration should be given to these issues.</i>                                                                                                                                                                                                                                                                                                                                                                                                                   | A bat impact assessment was carried out in the submitted EIAR in Chapter 6 Biodiversity. The potential for impact from wake effects such as barotrauma and collision mortality is assessed in Section 6.5.3.2.1 of the submitted EIAR.                                                                                                                                                                  |
| 4.5                                                                          | <i>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.</i> | <p>The potential for the Proposed Project to result in impacts on other protected fauna, besides those recorded within the Proposed Project site during ecological surveys undertaken, and other species identified as being KERs, has been considered in Section 6.4.3 of the EIAR, and is detailed in Table 6-14.</p> <p>Further detail is outlined in Section 6.5.2.2.5 of the Report.</p>           |
| 4.6                                                                          | <i>You are requested to outline the cumulative impact of the proposed development with the anthropogenic effects of noise on biodiversity.</i>                                                                                                                                                                                                                                                                                                                                                        | <p>As discussed in Section 12.5.2.1.1 within the Noise Chapter of the submitted EIAR, noise mitigation measures have been prescribed to ensure that noise levels remain within the limits during construction and operation of the Proposed Project.</p> <p>Section 6.6.1.1 of the Report provides further detail on the potential for cumulative effects as a result of noise disturbance to fauna</p> |
| <b>Item 5. Biodiversity Management and Enhancements Plan (BMEP) – (EIAR)</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5.1                                                                          | <i>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</i>                                                                                                                                                                                                                                                                                                          | Appendix 6-7 Habitat Loss and Replanting Map Pack of the Report now provides Figure 1-1 of the BMEP at a scale of 1:2500 which show the habitat loss (hedgerow and treeline) associated with the Proposed Project.                                                                                                                                                                                      |

| Further Information Item No. | Query                                                                                                                                                                                                                                                                                                                                                                     | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|                              | <i>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.</i>                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5.2                          | <i>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.</i> | <p>As described in Section 6.5.2.1.1 of the EIAR, the Proposed Project will result in the removal of 23.3ha of improved agricultural grassland (GA1)<sup>3</sup> and 1800m of hedgerow/treeline (WL1/WL2) and associated stone wall (BL1).</p> <p>Detail on the value of hazel woodlands in the context of the Proposed Project site is set out in Section 6.4.3 of the EIAR.</p> <p>In Section 6.5.2.1.3 of the EIAR and Section 3.1 of the BMEP, it is stated that any areas of woodland in close proximity to the Proposed Project will be roped off or fenced off with access strictly prohibited.</p> <p>Section 6.5.3.2.2 of the Report further context to the proposed vegetation removal as a result of the Proposed Project.</p>                                                               |
| 5.3                          | <i>The EIAR makes reference to the BMEP entailing native woodland planting and these areas should be outlined in the BEMP.</i>                                                                                                                                                                                                                                            | <p>While there will be no loss of woodland associated with the Proposed Project, native woodland planting is categorised as treeline line planting in the BMEP (as submitted). The BMEP sets out the replanting of 3600m of linear vegetation within the Site in order to increase hedgerow and treeline habitat and offset the loss of 1.8km of hedgerow and treeline habitat associated with the Proposed Project as shown in Figure 3.1 of the BMEP, the section above. The BMEP also focusses on the establishment of 14.5ha of species-rich calcareous grassland within the Proposed Project site. The purpose of this is to increase the extent of this declining Annex I habitat and to link up existing areas of Annex I species rich calcareous habitats within the Proposed Project site.</p> |

<sup>3</sup> A Guide to Habitats in Ireland (Fossitt 2000)

| Further Information Item No.                    | Query                                                                                                                                                                                                                                                                                                                                                                                                                      | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| 5.4                                             | <i>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.</i>                                                                                                                                                                                                              | As described in Section 6.4.1.2.1 of the EIAR, some areas of hazel woodland occur within the Site and have been classified as oak-ash-hazel woodland (WN2). The importance of this woodland habitat has been recognised and they have been assessed as corresponding with the Annex I habitat type: wooded limestone pavement. As such, woodlands have been completely avoided by the Proposed Project footprint and mitigation has been prescribed for their protection as set out in Section 6.5.2.1.3 of the EIAR and Section 3.1 of the BMEP. Any areas of woodland in close proximity to the Proposed Project will be roped off or fenced off with access strictly prohibited. This fencing is shown in Figure 3-1 of the submitted EIAR Appendix 6-4 (BMEP) and in the updated figures in appendix 6-7.                                                                                                                                                                                                                                                                                                                                                    |
| 5.5                                             | <i>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.</i> | Chapter 11 of the EIAR identifies, describes and assesses the potential significant direct and indirect effects on climate arising from the construction, operation and decommissioning of the Proposed Project. A detailed carbon loss and savings assessment is contained in Section 11.4 of the EIAR which considers how the Proposed Project will affect Ireland's climate via the emission of greenhouse gas emissions associated with all phases of the Proposed Project.<br><br>The carbon loss assessment provided in Section 11.4.2.1.1 of Chapter 11 of the EIAR is informed by the greenhouse gases associated with the Proposed Project, i.e., the full lifecycle and embodied carbon of materials used (including roads), as well as carbon losses resulting from ground disturbance during excavation. As detailed in Section 11.4.2 of Appendix 11-2 Climate Chapter Addendum of the Report, to ensure a robust assessment in Section 11.5, loss of carbon fixing vegetation have been considered in Section 11.5.2 and 11.5.3 for the detailed impact assessment and Annex 11-1a for further information on assumptions used in this assessment. |
| <b>Item 6. Grid Connection (EIAR &amp; NIS)</b> |                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 6.1                                             | <i>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</i>                                                                                                                       | The design methodology for the Proposed Grid Connection watercourse crossings is correct, and has been assessed as per the crossing methodology detailed in Appendix 4-8a Addendum Grid Connection Infrastructure. An additional Appendix 4-9 Watercourse Crossing of the Report details further information in relation to the proposed watercourses.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| Further Information Item No. | Query                                                                                                                                                                                                                          | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|                              | <i>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.</i> | Section 6.2.2.1.1 of the revised NIS has been updated to reflect that the Proposed Grid Connection Underground Cabling Route will cross the River Clare via Horizontal Directional Drilling (HDD). This is fully assessed in the revised NIS with mitigation included to prevent water quality deterioration associated with construction of the Proposed Grid Connection. It has been concluded that there is no potential for the proposed works to result in a residual adverse effect on any European Site once the prescribed measures are implemented.                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 6.2                          | <i>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.</i>                                                             | <p>The Planning Drawings (included in the Planning Pack) are relevant to S37E Application for the Proposed Wind Farm only. Drawings of the Proposed Grid Connection assessed are included in Appendix 4.8: Grid Connection Infrastructure of the EIAR to facilitate ACP to complete a robust EIA of the Proposed Project.</p> <p>In response to the query by ACP, Appendix 4-8a Addendum Grid Connection Infrastructure of the Report has been updated to outline the proposed HDD at Watercourse Crossing 2 (WC2) to show all proposed HDD locations and HDD pit locations are clearly outlined.</p> <p>The final location and configuration of all HDD location will be detailed in a separate Planning Application for the Proposed Grid Connection infrastructure.</p>                                                                                                                                                                                                        |
| 6.3                          | <i>Potential noise and vibration effects of the HDD on all relevant species should be outlined for any HDD crossing.</i>                                                                                                       | <p>As described in Section 6.4.2.3.4 Table 6-13 of Chapter 6 of the EIAR, no evidence of bat roosting was found in the bridge structure over the Clare River where HDD is proposed. Updated surveys were conducted along the Proposed Grid Connection underground cabling route on the 19th of August 2025, which included more detailed bat roost inspections of the existing crossing structures. No evidence of bat roosts were found during the updated 2025 surveys, with further detail on these surveys provided in Section 6.4.2.3 of the Report. Section 6.5.2.2.1 of the EIAR further describes the Assessment of Potential Effects on Bats of any HDD proposed at crossings.</p> <p>Section 6.2.1.2.8 of the revised NIS contains updated detail on potential disturbance to Otter as a result of proposed HDD along the Proposed Grid Connection Route.</p> <p>Section 6.5.2.2.6 of the Report provides further information on potential impacts of HDD on Fauna.</p> |

| Further Information Item No. | Query                                                                                                                                                                                                                                                                                                                                                                                                              | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| 6.4                          | <i>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.</i>                                                                                                                                                                                                                                                      | Drawings of the Proposed Grid Connection assessed are included in Appendix 4.8: Grid Connection Infrastructure of the EIAR, which includes a schematic of WC1 via Option A – standard trefoil formation. Appendix 4-9 Watercourse Crossings, provided as an additional appendix to the Report, provides site specific details of all proposed watercourse crossings along the Proposed Grid Connection underground cabling route.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 6.5                          | <i>Cross profiles of all water crossing locations indicating watercourses, riverbanks should be outlined.</i>                                                                                                                                                                                                                                                                                                      | Appendix 4-9 Watercourse Crossings, provided as an additional appendix to the Report, provides cross profile details of all proposed watercourse crossings along the Proposed Grid Connection underground cabling route.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 6.6                          | <i>Clarify if any instream works are proposed.</i>                                                                                                                                                                                                                                                                                                                                                                 | <p>As stated in Section 4.5.1 of the EIAR no surface watercourses exist within the Proposed Wind Farm site. Section 9.3.3.1.1 of the EIAR details that the closest watercourse to the Proposed Wind Farm site is the Ballinduff stream (also referred to as Bunnatubber spring by the EPA) situated 2.6km west of the Proposed Wind Farm site.</p> <p>As described in the EIAR, there are 4 no. watercourses along the Proposed Grid Connection route. No instream works proposed as of the Proposed Grid Connection works. This is detailed in Section 4.7.2.9 Table 4-4 of the EIAR, Section 2.3.2.13 and Section 7 Table 7-1 of Appendix 4-3 Construction Environmental Management Plan (CEMP) of the EIAR. This is also detailed in additional appendix of the Report Appendix 4-9 Watercourse Crossings.</p>                                                                                                                    |
| 6.7                          | <i>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</i> | <p>As detailed in Section 4.7.2.9 of the EIAR, a total of 4 no. existing watercourse crossings and 1 no. Motorway crossing will be traversed along the N83 National Road and the L6141 to cater for the Proposed Grid Connection underground cabling route towards the existing Cloon 110kV substation. The locations of the watercourse and motorway crossings are shown on Figure 4-28 of the EIAR and specific details of each crossing are shown in Appendix 4-8 Grid Connection Infrastructure of the EIAR Addendum Report. Drawing No. 210627-17 provides crossing specific details of WC1 Type A using standard trefoil formation for the Claretuam Bridge on the N83 above a double concrete pipe.</p> <p>The watercourse crossing methodologies for the provision of the Proposed Grid Connection underground cabling component at these locations is set out in Section 4.7.2.9 of the EIAR, with the most appropriate</p> |

| Further Information Item No.         | Query                                                                                                                                                                                                                                                                                                                    | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|                                      | <i>(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.</i>      | <p>option selected for each crossing. In stream works are not required at any watercourse crossing along the Proposed Grid Connection underground cabling route.</p> <p>Appendix 4-9 Watercourse Crossings of the Report presents details of each of the 4 no. proposed watercourse crossing points and their respective crossing methodologies.</p> <p>Taking into account the observation made by TII on the design methodology on watercourse crossings for the Proposed Grid Connection the Applicant has reviewed the proposed crossing methodologies for all crossings. The Applicant has noted the comments of TII in relation to HDD (Option D) at WC1 at the Claretuam Bridge. The Applicant and the project engineer has assessed the proposed watercourse crossing methodology at WC1, and concluded that due to the nature of the watercourse type, a double concrete pipe, and its depth approximately 3.3m from the road level, as shown in Drawing No. 210627-17 of Appendix 4-8a, the proposed crossing methodology of Option A for the Proposed Grid Connection is appropriate at this location.</p> <p>It is re-iterated here for clarity that the Proposed Grid Connection does not form part of the subject application, but rather will form a separate planning application to ABP under Section 182A of the Act, and all relevant stakeholders will be contacted as part of that application process.</p> |
| <b>Item 7. Shadow Flicker (EIAR)</b> |                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 7.1                                  | <i>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 &amp; Annual Shadow Flicker. Calculations should include all dwellings within the study area including H213.</i> | <p>Section 5-9 of the Report provides further clarification on the shadow flicker assessment used to model and predict daily and annual shadow flicker results for the Proposed Wind Farm and on the numbering of dwellings included in Table 5-10 of the EIAR. Following the FIR by ACP, a review was conducted of Table 5-10 of the EIAR, with further detail also provided in this Section of the Report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Further Information Item No.          | Query                                                                                                                                                                                                                                                                            | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| 7.2                                   | <i>Please confirm if the shadow flicker software utilised in the EIAR has been validated.</i>                                                                                                                                                                                    | <p>As stated in Section 5.2.3.3 of Chapter 5 of the EIAR for the purposes of this shadow flicker assessment, the software package WindFarm Version 5.0.2.2 has been used to predict the level of shadow flicker associated with the Proposed Project. WindFarm is a commercially available software tool that enables developers to analyse, design and optimise proposed wind farms. It allows proposed turbine layouts to be optimised for maximum energy yield whilst taking account of environmental, planning and engineering constraints.</p> <p>The use of specialist computer software programmes specifically designed for the wind energy industry and their utilisation in EIAR has been verified through their use a numerous previous wind energy development EIARs. There are a number of organizations, both within Ireland, Europe and Globally who are users<sup>4</sup> of the WindFarm software package, including ESB International Limited (Ireland), University of Limerick (Ireland), AtkinsRéalis (Global) and the Australian Antarctic Division (Australian Government).</p> |
| <b>Item 8. Water (EIAR &amp; NIS)</b> |                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 8.1                                   | <i>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.</i>                                 | Section 4.5 of the Report has been updated to reflect the design capacity of the attenuation and infiltration devices for the management of construction waters and storm water management                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 8.2                                   | <i>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.</i> | Section 6.2.2.3 of the revised NIS has now been updated with additional detail around mitigation measures required during decommissioning of the Proposed Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

<sup>4</sup> WindFarm from ReSoft – Users (ReSoft Website, Last Accessed: 15 August 2025, - <https://www.resoft.co.uk/html/users.html>)

| Further Information Item No.                | Query                                                                                                                                                                                                                            | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| <b>Item 9. Noise &amp; Vibration (EIAR)</b> |                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 9.1                                         | <i>You are requested to clarify if the wind farm noise calculations are based on collective / standalone turbines.</i>                                                                                                           | <p>Table 12-10 of the EIAR presents the sound power level for each one of the proposed turbines, in this instance Nordex N163 turbines with a hub height of 103.5 m above ground level. There are eight such turbines in the Proposed Wind Farm as presented in Table 12-9 of the EIAR. Awn confirms that the predicted noise levels in Table 12-18 and in Appendices 12-7 and 12-8 of the EIAR are the combined noise levels of all eight turbines at each of the noise-sensitive locations. Calculations are carried out fully in accordance with the guidance in IOAGPG.</p> <p>In summary the calculated noise levels are collective, based on all eight turbines operating at the same time.</p>                                                                                                                                                             |
| 9.2                                         | <i>Consideration should be given to seismic effects, seismic effects and infrasound from the karstic limestone spindles vibration, impacts of vibration on property</i>                                                          | <p>Section 12.3.4 provides further detail on vibration and seismic effects as a result of the operation of the Proposed Wind Farm.</p> <p>Section 12.3.3.1 of the EIAR discusses low-frequency noise in its application to noise assessment, with further detail provided in Section 12.3.3.1 of the Report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Item 10. Wake Effects (EIAR)</b>         |                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10.1                                        | <i>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.</i> | <p>Turbine wake effects describe the phenomenon in which downstream of moving wind turbines a region of slower wind speeds and increased turbulence is created. As wind passes through the turbine rotor blades, kinetic energy is converted to mechanical energy, allowing for electricity generation and reducing wind speed behind the wind turbine. The wake effect is a fundamental aspect taken into consideration in wind farm layout and design in order to reduce effects on yields.<sup>3</sup></p> <p>Turbine wake effect is an operational consideration which has been taken into account within the design of the Proposed Project. The literature notes that, while micrometeorological effects of wind turbines have been assessed globally, there is little evidence of measured effects on biotic or abiotic receptors such as livestock or</p> |

<sup>3</sup> <https://vortexfdc.com/blog/wakes-and-blockage/>

| Further Information Item No.            | Query                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | temperature. There is a distinct lack of research in this area relating to areas in Europe including the UK and Ireland <sup>6</sup> . No body of work has been published which would link the turbine wake effect to having an impact on downstream lands, livestock or local temperature variations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Item 11 Cultural Heritage (EIAR)</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 11.1                                    | <p><i>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 preconstruction underwater archaeological assessment should be undertaken as follows:</i></p> <p><i>Submit an Underwater Archaeological Impact Assessment (UAIA) to include:</i></p> | <p>Tobar Archaeological Services Ltd prepared the archaeology and cultural heritage chapter, Chapter 13, of the EIAR which accompanied the planning application for the Proposed Wind Farm and have prepared a response to item 11 of the FIR as it relates to cultural heritage.</p> <p>Item 11 of the FIR has requested an Underwater Archaeological Impact Assessment (UAIA) of the proposed development as per the recommendation of the Department of Housing, Local Government and Heritage (DHLGH).</p> <p>In response to the request for the completion of an UAIA, it is noted that no watercourses are located within the Proposed Wind Farm site. In this regard it is not possible to undertake an UAIA of the Proposed Wind Farm site given the absence of any watercourses requiring assessment.</p> <p>Four watercourses are located along the Proposed Grid Connection underground cabling route utilising a number of crossing options as follows:</p> |

<sup>6</sup> Sander, L., Jung, C., & Schindler, D. (2024). Global Review on Environmental Impacts of Onshore Wind Energy in the Field of Tension between Human Societies and Natural Systems. *Energies*, 17(13), 3098.  
<https://doi.org/10.3390/en17133098>

| Further Information Item No.     | Query                                                                                                                                                                                                                                                       | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| 11.2                             | <i>A desktop assessment that addresses the underwater cultural heritage (including wrecks, archaeological objects, built heritage, riverine and industrial heritage) of the proposed development area.</i>                                                  | <p>           &gt; WC1 - Double concrete pipe crossing - Option A: Crossing using standard trefoil formation<br/>           &gt; WC1 - Double concrete pipe crossing - Option A: Crossing using standard trefoil formation<br/>           &gt; WC1 - Double concrete pipe crossing - Option A: Crossing using standard trefoil formation<br/>           &gt; WC1 - Double concrete pipe crossing - Option A: Crossing using standard trefoil formation         </p> <p>Further details on the proposed watercourse crossings are included in Appendix 4-9 Watercourse Crossings of the Report.</p> <p>As stated in the EIAR, in stream works are not required at any of the four watercourse crossing locations which means that there is no potential for direct effects to any riverine cultural heritage items or archaeological objects. HDD is proposed to be utilised at WC2, Cloonmore Bridge, while flatbed formation or standard trefoil formation crossings will be utilised at the other three crossings with all works taking place in the existing public road at those three locations. The entry and exit pits to facilitate the HDD at WC2 will be located within the existing public road (EIAR Addendum Report Appendix 4-8a Drawing no 210627-11a) and are not located on the riverbank or in close proximity to same which removes the potential for direct effects to any sub-surface archaeological features or structures located on or within the bank.</p> |
| 11.3                             | <i>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.</i> | <p>Given the absence of watercourses within the Proposed Wind Farm site, the lack of instream works at any of the four water crossings on the Proposed Grid Connection underground cabling route and all associated works taking place in the public road network it is considered that an UAIA is not necessary for the Proposed Project. In light of the above no likely potential effects to underwater archaeological or cultural heritage items will occur as a result of the Proposed Project.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Item 12. Landscape (EIAR)</b> |                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 12.1                             | <i>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.</i>                                                  | <p>Section 14 of the Report considers has considered the potential impacts of the Proposed Project on the historical landscape value of the Proposed Project site and its compatibility with the principles set out in the European Landscape Convention and the landscape directive.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| Further Information Item No.                   | Query                                                                                                                                                                                                                                                                                                                                                                                                                                      | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| <b>Item 13. Other Matters (EIAR &amp; NIS)</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 13.1                                           | <i>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.</i>                                                                                                                                                                 | Blasting was assessed in the Noise chapter on a precautionary basis, however based on the assessments and the site investigations carried out to date, it is not envisaged that rock blasting will be required at the site, and so was not considered further in the EIAR. This has been updated in relevant sections of the Report.                                                                                                                                                                                |
| <b>EIAR</b>                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 13.2                                           | <i>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 Ireland's guidelines given the siting of the proposed development relative to the gas pipeline.</i>                                                                                                                     | Section 8.5.2.8 of the Report considers the potential effects on Land, Soils and Geology from works near underground gas pipelines<br><br>Section 15.3.1 of the Report contains further information, in addition to information provided in Section 3.2.5.2.2 of Chapter 3 and Section 15.1.1.4 and 15.3.1 of Chapter 15 of the EIAR on the Proposed Project's compliance with Gas Networks Ireland and Health and Safety Authority guidance on works within the vicinity of underground gas transmission services. |
| 13.3                                           | <i>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</i> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| Further Information Item No. | Query                                                                                                                                         | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|                              | <i>loadings to be accommodated at these locations relative to GNI required specifications should be outlined.</i>                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 13.4                         | <i>Treatments /recycling of turbine blades at post decommissioning stage should be outlined.</i>                                              | Section 4.10 of the Report and Section 2.4.2 of EIAR Addendum Appendix 4-7a Addendum Decommissioning Plan have been updated to provided further detail on the recycling of turbine blades during the decommissioning stage of the Proposed Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 13.5                         | <i>Technical chapters of the EIAR should be updated by way of an addendum to detail the volumes of wastes arising, where applicable.</i>      | Section 3.8 of Appendix 4-5 Construction Environmental Management Plan (CEMP) as submitted, details the waste management plan (WMP) which outlines the best practice procedures for the minor volumes of waste which may be produced during the excavation and construction phase of the Proposed Project. The WMP outlines the waste prevention methods of waste prevention and minimisation by recycling, recovery, and reuse at each stage of construction of the Proposed Project. Disposal of waste will be seen as a last resort.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 13.6                         | <i>Clarify if SF6 gas is to be used as in insulant for electrical equipment. Relevant safeguards should be outlined, if/where applicable.</i> | <p>EirGrid have released Technical Specification Documents in April 2025<sup>7</sup> in response to updates due to EU Directive 2024/573 on fluorinated greenhouse gases. The use of SF6 is to be phased out of use in Gas Insulated Switchgear (GIS) and a number of manufacturers have entered the market with alternative systems, with more in development. Depending on the timing of the Proposed Project and availability of these alternatives at that time, SF6 may not be used in future substations for Circuit Breakers.</p> <p>As described in the EIAR, the ‘Proposed Grid Connection’ relates to the on-site 110kV substation and temporary construction compound and underground cabling connection to the existing Cloon 110kV Substation. The Proposed Grid Connection will facilitate the connection of the Proposed Wind Farm to the national electricity grid and will be subject of a separate planning application under Section 182A of the Planning and Development Act 2000, as amended. EirGrid requirements with regard to 110kV Switchgear</p> |

<sup>7</sup> EirGrid (April 2025). 110 / 220 / 400 kV Gas Insulated Switchgear (GIS) Connected to the Transmission System - XDS-GFS-25-001-R5. Available at: <https://cms.eirgrid.ie/sites/default/files/publications/XDS-GFS-25-001-R5-110-220-400kV-GIS.pdf>

| Further Information Item No. | Query                                                                                                                                             | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                              |                                                                                                                                                   | details that, unless it is otherwise approved by Eirgrd, the insulating medium to be used shall be an SF6-Free medium.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 13.7                         | <i>The grade of aggregate, steel and concrete utilised should be outlined for the proposed development.</i>                                       | <p>Section 4.7.1.2.1 of the EIAR states that the access roads will be constructed using well-graded imported granular fill, spread and compacted in layers typically of 200mm and a suitable capping layer to provide a homogeneous running surface. The thickness of layers and amount of compaction required will be subject to detailed design by Project Engineer in consultation with the Construction Manager based on the characteristics of the material and the compaction plant to be used.</p> <p>Section 4.3.3.1 of the EIAR details the volume of stone required to build the Proposed Project infrastructure, while Section 4.4.2.1 details the locations of quarries from which rock and hardcore material could potentially be sourced from in order to facilitate the construction of the Proposed Project</p> <p>As detailed in Section 15.1.2.3 of the EIAR, stone, sand and cement required for the construction of the Proposed Wind Farm and the Proposed Grid Connection infrastructure will be sourced from local, appropriately authorised quarries. Potential quarries, with a 20km radius of the wind farm site are shown on Figure 4-24 of the EIAR. Quarries are located to the north and south of the site and all materials provided by these quarries will enter the site via the temporary road, off the N83</p> <p>The specific grade of aggregate, steel and concrete which will be used in the construction of the Proposed Project cannot be specifically defined at this time, as this will likely be informed by manufacturer specific requirements at the time of construction. The level of detail in the Application is commensurate to current wind farm applications.</p> |
| 13.8                         | <i>All EIAR chapters should clearly outline the indirect/potential indirect effects arising, which should be addressed by way of an addendum.</i> | <p>Section 1.2 and 1.6 of Chapter 1 Introduction of the EIAR and Section 1.6 of the Report detail the purpose and scope of the EIAR. The EIA is the assessment carried out by the competent authority, which includes an examination that identifies, describes and assesses in an appropriate manner, in the light of each individual case and in accordance with Articles 4 to 11 of the Environmental Impact Assessment Directive, the direct and indirect significant effects of the Proposed Project.</p> <p>Throughout the EIAR, the likely significant direct and indirect effects related to the Proposed Project have been identified and described in accordance with all of the guidance documents and legislation as identified</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

| Further Information Item No. | Query                                                                                                                                                                                                                                                                                                                              | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|                              |                                                                                                                                                                                                                                                                                                                                    | in Section 1.1.1 of Chapter 1 of the EIAR, including the EPA Guidelines. Where the potential for likely significant indirect effects was identified in the EIAR, these effects were robustly considered and assessed in their respective chapters.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 13.9                         | <i>The Interactions chapter, EIAR Non-Technical Summery, CEMP and relevant plans should be updated by way of an addendum to take the request for further information into account, where applicable.</i>                                                                                                                           | As detailed in the Response to FI Cover Letter, An EIAR Addendum Report (the Report) has been prepared in order to update the EIAR and associated appendices, where appropriate, taking the ACP FI Request into account, in order to allow ACP to complete a robust environmental impact assessment of the Proposed Project. Where items have already been addressed in the documentation on file, the relevant section and document is referenced, and the material is not repeated in the EIAR Addendum or revised NIS as appropriate.                                                                                                                                                                                                                                                                       |
| 13.10                        | <i>Please clarify details in relation to the project site size (in hectares) and proposed turbine coordinates outlined.</i>                                                                                                                                                                                                        | <p>As stated in Section 1.1.1 of the EIAR, the Proposed Project is located within the EIAR Site Boundary or the 'Site' and measures approximately 944 hectares (ha). The permanent footprint of the Proposed Project measures approximately 13.8 hectares, which represents approximately 1.46% of the Site.</p> <p>The Grid Reference coordinates of the proposed turbine locations are listed in Table 4-1 of Chapter 4 of the EIAR.</p> <p>On review of the EIAR in response to the ACP FI Request, typographical errors were found in Chapters, and the Response to Submissions document submitted to ACP in March and August 2024 respectively.</p> <p>The Proposed Project site size and proposed turbine locations are reiterated in Section 4.3.1 and Section 4.3.1.1.1 of the Report for clarity.</p> |
| 13.11                        | <i>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.</i> | Section 5.3.7 and Section 12.3.6.1 of the Report details further consideration which has been given to Equine Facilities within the vicinity of the Proposed Wind Farm.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

| Further Information Item No. | Query                                                                                                                                                                                                                                                                                                                                                              | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|                              | <i>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.</i> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 13.12                        | <i>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.</i>                                 | <p>All roads and access will be maintained throughout all phases of the Proposed Project. As stated in Section 3.2.3 of the EIAR the Site was identified, taking into consideration the avoidance of direct impacts on access, among a number of other constraints.</p> <p>As stated in Section 5.10.2.2.1 of the EIAR, public safety will be addressed by restricting Site access during construction. Fencing will be erected in areas of the Site where uncontrolled access is not permitted. This restricted access during the construction phase is solely in relation to areas within the Proposed Project footprint as shown in Drawing No 210627-10 of the Planning Drawings as submitted.</p> <p>Section 15.1.9 of the EIAR details the measures to ensure local road connections within internal access roads crossing are maintained. There are various locations where the Proposed Wind Farm internal access road crosses existing local farm access roads. During the construction phase these locations will be attended by site staff and existing farm access retained at all times. On the completion of the construction phase, the Proposed Wind Farm access road will be gated at either side of these locations, and priority retained for farm access at all times.</p> <p>Any access tracks which lead to other areas within or in the vicinity of the site will not be impinged upon, such as the access track which leads to folio GY45478.</p> |
| NIS                          |                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| Further Information Item No.                    | Query                                                                                                                                                                                                                                                                                                                                  | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| 13.13                                           | <i>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.</i>                                                                                     | Appendix 6-1 of the EIAR (Botanical Study) details results of relevés undertaken within the footprint of Proposed Wind Farm infrastructure. Given that the Proposed Wind Farm is located completely outside of any European Site, the results of the detailed botanical surveys have no bearing on and are not relevant to the Appropriate Assessment of the Proposed Project. Notwithstanding this, the revised NIS has been updated to include the botanical study as an appendix.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Item 14. Response Format &amp; Timeframe</b> |                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 14.1                                            | <i>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.</i> | <p>As detailed in the Response to FI Cover Letter, an EIAR Addendum Report (the Report) has been prepared in order to update the EIAR and associated appendices, where appropriate, taking the ACP FI Request into account, in order to allow ACP to complete a robust environmental impact assessment of the Proposed Project.</p> <p>The Report should be read as an appendix to the overall Response to Further Information Document. The Report presents relevant updates or changes to the previously submitted EIAR and EIAR Appendices where appropriate. It is not intended that the Report replaces the submitted EIAR, rather the Report is read in conjunction with the submitted EIAR. For Chapters where the Project team have confirmed that no relevant updates or changes are necessary, this is outlined under the relevant chapter heading of the Report.</p> <p>Where best practice with respect to Chapter structure has evolved since the original submission (March 2024), to ensure maximum clarity and transparency the whole chapter has been updated, to include removal of text in red strikethrough and insertion of text in green are outlined. This approach has been taken with respect to Chapter 11: Climate. Chapter 11 Climate has been included as an Appendix to the EIAR Addendum Report, rather than included within the Report, as a result of this approach.</p> <p>A revised NIS has been prepared as an update to the NIS (the revised NIS) submitted with the initial planning application. Updates to the NIS are included throughout this document as green text. The purpose of the revised NIS is to allow for the inclusion and consideration of the results of additional ecological surveys (including bird surveys) which were undertaken between 2024 and 2025, and to allow consideration</p> |

| Further Information Item No. | Query | Response to Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|                              |       | <p>of additional collision risk modelling and cumulative assessments carried out in response to the FIR, in order to allow ACP to undertake a robust Appropriate Assessment of the Proposed Project. Other updates to the NIS have also been incorporated according to additional items raised in the FI Request, including an assessment of the potential for impacts on the Qualifying Interest (QI) lesser horseshoe bat roost, assessment of the Decommissioning Phase of the Proposed Project, and full assessment of methodologies proposed for construction of the Proposed Grid Connection. The NIS and its appendices should be read in conjunction with the EIAR Addendum Report.</p> <p>A standalone Traffic and Transport Impact Assessment has been provided as Appendix 5 to the Response to FI. The TTIA summarises a road assessment undertaken on the N83 / L-61461 / L-6146 junction. A number of traffic management measures are recommended to be implemented however, overall, the junction will operate well within its capacity during both the construction and operational phases of the Proposed project.</p> |

3.

## **ERRATA**

It was noted that typographical errors in relation to the width of channels in Chapter 4 of the **EIAR**. The figures noted in Table 4-1 of Section 4.7.2.9 did not correspond to the crossing specific drawings in Appendix 4-8 Grid Connection infrastructure as submitted. This has been revised in Section 4.7.2.9 Table 4-1 of the Report, as Appendix 3 to the **RFI Document**.

