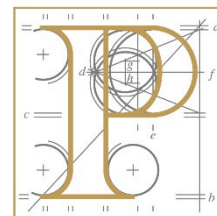


Our Case Number: ABP-320089-24

Your Reference: Hessian



An
Bord
Pleanála

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

Date: 15 May 2025

Re: Wind Farm Comprising of 11 Wind Turbines and Associated Infrastructure.

Located at townlands of Killavoher, Gortagarraun, Cloonarkan, Lomaunaghroe, Clonberg, Ballagh West, Carrownryla & Lissybroder, Co Galway
(<https://www.clonbernewfplanning.com/>)

Dear Sir / Madam,

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

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

Procedural/Administrative Issues

1. The pre-application consultation undertaken under file ref. ABP 307058-20 provided for consideration of 11 no. 4.8MW turbines with a tip height of 170 metres. The tip height of the 11 no. turbines subject of this application is stated to be 180 metres.

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In this regard you are requested to submit a statement setting out your opinion as to the validity of the application in the context of the development as presented in the pre-application application.

2. Point (iii) of the public notices which sets out the nature and extent of the development for which permission is being sought refers to the provision for the undergrounding of a section of 38kV overhead electrical cabling (as proposed under Galway County Council planning ref. 24/60230) including the provision of 2 no. 38kV Line to Cable Interface End Masts up to a height of 16.2 metres and associated cable ducting to facilitate the undergrounding of the proposed 38kV cabling.

The said planning application as detailed in the public notices has been withdrawn.

Revised public notices with the necessary revisions made to provide for the accurate nature and extent of the development for which permission is being sought are required.

The necessary revisions to the plans and details accompanying the application are also required.

3. Sections 8.3.1 and 9.3.1 of the EIAR notes that 40% of the site is bog where peat cutting in the form of private turbary plots is widespread, with some peat harvesting to the west and southeast of the site. Reference to peat harvesting throughout the Peat Stability Assessment Report is noted.

Turbines and ancillary development are proposed to be located within the area(s) subject of this peat harvesting.

- (a) You are required to clarify the nature and extent of the peat harvesting area(s) within the site. The extent of the area(s) should be calculated and delineated on an appropriately scaled map(s).
- (b) Confirm whether the proposed development is to utilise the drainage network installed for the purposes of this peat harvesting.
- (c) Confirm whether peat harvesting is to continue during the lifetime of the wind farm and clarify that the proposed drainage plan can be effectively implemented whether or not peat harvesting is taking place.
- (d) Confirm that should peat harvesting continue during the lifetime of the wind farm that it has been appropriately included and assessed in the EIAR and AA.

4. Confirm that all existing and permitted dwellings and other sensitive receptors within 1.62 km of the proposed turbines for the shadow flicker assessment and 2km of proposed turbines for the noise assessment are accounted for and delineated on the relevant plans and drawings that accompany the application.

Should additional properties be identified for inclusion, details of their location and numbering to be provided.

5. Table 0-1 of the Non-Technical Summary which provides details of the proposed wind turbine locations, their grid reference coordinates and proposed top of foundation levels is incorrect and does not refer to the development subject of the application. The table should be rectified and the document amended accordingly.
6. Submit a detailed response to the submissions received from observers, prescribed bodies and the local authority to the application.

Biodiversity

1. Section 7.2.4.2.6 (waterbird distribution and abundance surveys) of Chapter 7 (Ornithology) of the EIAR states that “significant wetland sites” were surveyed for waterbird populations. Please provide a scaled map showing the locations of the “significant wetland sites” (labelled). Please provide a table showing the distance of each of the “significant wetland sites” to the EIAR site boundary and to the turbine locations.
2. Please provide a scaled map showing the locations of turloughs/loughs (labelled) in the surrounding area of the proposed development (to at least 8km radius of EIAR boundary). Please provide a table showing the distance of each of the turloughs/loughs to the EIAR site boundary and to the turbine locations.
3. Kilmurray turlough is identified as a “significant wetland site” in Chapter 7 (Ornithology) of the EIAR. An assessment of the likely effects on Kilmurray turlough in terms of hydrology/hydrogeology does not appear to have been included in Chapter 9 (Hydrology and Hydrogeology) of the EIAR. Please provide an assessment of the likely effects from the proposed development on Kilmurray turlough and potential indirect effects on the bird species that it supports. You are requested to also clarify that all other turloughs/loughs/significant wetland sites in the surrounding area have been considered in the assessment (including indirect effects on birds).
4. Please provide details of the ornithology surveys which were undertaken at the proposed borrow pit location, including survey types, dates of surveys and results.
5. Section 7.10.1 of Chapter 7 notes that assessment material for the ornithology cumulative assessment was compiled and verified on 23/11/2023. The cumulative effects assessment (ornithology) should be updated to include any more recent developments, including but not limited to those where the status has since changed from pre-application stage to submitted for consent and/or permitted. Aside from wind energy developments, the

cumulative effects assessment (ornithology) should also include other plans or projects in the area which could result in significant habitat loss, increased mortality or displacement/disturbance, including but not limited to overhead line developments.

6. You are requested to clarify if wake effects will arise from the proposed development on birds. Consideration to these issues should be given.
7. Please update the following figures/tables related to Chapter 7 (Ornithology) of the EIAR:
 - Figure 7.3 (Breeding walkover transects) – transect locations need to be specifically labelled (e.g. 1,2,3, T1, T2 etc) to match information in Appendix 7-2.
 - Figure 7.4 (Breeding Raptor Survey Areas) – label 2018/2019 areas to match information in Appendix 7-2.
 - Figure 7.5 (Winter walkover transects) - transect locations need to be specifically labelled to match information in Appendix 7-2.
 - Figure 7.6 (HH Roost Survey Areas) – add HHVP3 and HHVP4 to match information in Appendix 7-2.
 - Figure 7.8 (Connectivity VP Survey Location) – add Kilmurray turlough location.
 - Table 8 Appendix 7.2 (Breeding Red Grouse survey effort) – add transect locations to the table for the two 2023 surveys.
 - Please provide figures to accompany the waterbird distribution surveys and incidental observations that are presented in Appendix 7.4.
8. Table 6-3 of the EIAR indicates that a pathway for likely significant effects on the Kiltullagh Lough pNHA has been identified and is therefore determined to be within the proposed development's Likely Zone of Impact. However, this site has been omitted from further assessment in the remainder of Chapter 6. If a pathway is confirmed, the Chapter should be updated to identify Kiltullagh Lough pNHA as a Key Ecological Receptor (KER).
9. As per Table 6-20 (Key Ecological Receptors identified during the assessment) of the EIAR, it is indicated that the site surveys did not identify any other protected faunal species (i.e. 'Additional protected fauna') with the potential to be significantly affected by the proposed development at the population level. For this reason, no additional species have been included as KERs. It is noted that Pine Marten (*Martes martes*), Irish Hare (*Lepus timidus*) and the Common frog (*Rana temporaria*) were recorded on the site. Observations on the application received by the Board detail other species such as the Irish Stoat (*Mustela erminea* subsp. *Hibernica*), Common lizard (*Zootoca vivipara*), and smooth newt (*Lissotriton vulgaris*) as being documented on the site. You are requested to set out its rationale for the exclusion of the forementioned species as KERs. Should the EIAR be revised to include any of the relevant species as KERs, suitable mitigation measures should be outlined.

10. Clarify the extent of habitat loss required from the provision of the 3 no. passing bays on the L-22321.
11. Stands of mature trees line either side of the eastern extent of the L-22321. The road is to be used by HGVs accessing the site from the proposed borrow pit. You are requested to provide its rationale for the exclusion of this section of the L-22321 from the surveys which have informed both the Bat Survey Report (Appendix 6-2) and Chapter 6 of the EIAR. You are invited to undertake surveys at this location if lacunae is identified and to submit the results. If necessary, the Bat Survey Report and EIAR should be amended accordingly.
12. It is noted that there are 2 no. watercourses (Levally Stream) crossings on the L-22321. Outline suitable mitigation measures to prevent sediment laden surface water run-off from entering the existing watercourses along this access route. Section drawings of the watercourses with the proposed mitigation detailed thereon to be submitted.
13. It is outlined within the Peat and Spoil Management Plan (Appendix 4-3 of the EIAR) that controlled quantities of peat and spoil shall be side-cast adjacent to access roads, i.e. 17,990m³ as per Table 8-2 (Summary of preliminary peat reinstatement volumes). Given the location of the existing and proposed internal roads relative to on-site watercourses, you are requested to identify the locations where it is proposed to side cast peat and soil and provide suitable mitigation measures, where necessary, to avoid the siltation of nearby drainage ditches or watercourses.
14. It is noted that it is proposed to upgrade a section of the internal access road between watercourse crossing no. C4 and C5. Given the location of this access road relative to the Levally Stream, you are requested to submit section drawings to illustrate the relationship between the upgraded access road and the existing watercourse and include the mitigation (silt fences etc.) as proposed to prevent direct surface water runoff. A section drawing should also be submitted of watercourse crossing no. C5.
15. Confirm whether it is necessary to backfill an existing drainage ditch to provide for the proposed spoil storage area. The proximity of the proposed spoil storage area to Levally Stream and the Annex I habitat 'Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels (6430)' is noted. Consideration to be given to additional mitigation measures to prevent silt laden surface water run-off from entering the nearby watercourses at this location. Section drawings showing the relationship between the spoil storage area and the nearby watercourse and drainage ditches to be submitted.

Roads and Traffic

1. Abnormal Size Load Delivery Route

- An observation is on file from a landowner at the junction of the N83 and the L6466 (Junction 9a) stating that he has not given his consent to the inclusion of his land or to the lodgement of the application.
- Junction 9b (bend on L-6466) appears to require the removal of a stand of trees/vegetation on lands along northern side of the L-6466 and the run-over area for the turbine plant deliveries encroaches on lands on the southern side of the L-6466 (i.e. Figure 15-23b of Appendix 15-4). This location is not included within the application but is included in the EIAR for assessment.

You are requested to demonstrate that it has the consent of the relevant landowner(s) to include the land(s) within the proposed application. Details of alternative access arrangements should be provided should the relevant landowner(s) consent not be secured to allow for the works identified as necessary along the turbine delivery route. Alterations as necessary to the letter of consent to make the application should also be made and submitted.

Please ensure that all relevant drawings, maps and figures in the documentation accompanying the application accurately reflect the extent of the site to which the application refers and does not include lands where the consent of the relevant landowner(s) has not been secured to make the application. Any revisions/amendments to be detailed and submitted.

2. The proposed development in its current form fails to accord with Development Management Standard 28 of the Galway County Development Plan given the restricted eastern visibility splay from the construction entrance on the R328 (Junction A). Notwithstanding the mitigation measures proposed, you are requested to install an Automatic Traffic Counter (ATC) to determine the 85th percentile (design speed) at this location. Demonstrate the vertical envelope of visibility (i.e. intervisibility in relation to crest/sag road profile) onto the R-328 in accordance with the relevant TII standards.
3. Submit a proposed boundary treatment plan for the access with the R329 (Junction A) following the completion of the abnormal load delivery phase and following completion of the overall construction phase of the development.
4. Submit revised drawings which shows the current extent of hedgerow and/or boundary walling setback for all entrances in order to achieve clear and unobstructed sightlines in both directions. If necessary, letter(s) of consent from any adjoining landowner(s) shall be provided, consenting to set back of their boundary in order to achieve clear and

unobstructed sight distances. The applicant shall also demonstrate that any adjoining lands to achieve required sight distance triangles are within their control.

5. The design information examined as part of the Road Safety Audit detailed in section 1.4 is noted. This does not include proposed roadside interventions on the turbine delivery route. You are requested to submit an updated Road Safety Audit to include their consideration.
6. Quantify the daily number of HGV traffic movements on local roads L2232 and L-22321 to be generated by the borrow pit.
7. Since the lodgement of the application Galway County Council has granted permission for a quarry with an area of c.6.2ha on the opposite side of local road L2232 to the proposed borrow pit (file reference number 24/60013). The permission provides for reprofiling works on the L2232. It is noted that the development as permitted is subject of a current appeal with the Board under ref. ABP 321022-24. Please address the cumulative impacts on the receiving road network should the borrow pit and quarry be worked in parallel and revise the EIAR and supporting documentation accordingly.

Cultural Heritage

Recorded Monument GA030-073 ---- (Enclosure) is located c. 22m to the east of the hardstand for T2. While this monument is partially upstanding and visible in the landscape, it may have a larger sub-surface extent. You are requested to undertake an archaeological geophysical survey at the location for T2, its associated infrastructure and general environs and provide a report on the findings.

Landscape and Visual Assessment

Provide a photomontage from the following viewpoint: Clonberne graveyard and protected structures Clonbern Old Graveyard (RPS.41) and Dennis Mausoleum (RPS 40)

Wake Effects

Address the potential for wake effects including consideration of effects on agricultural lands.

General

Having regard to this further information request, you are requested to provide a summary of all amendments to the EIAR, NIS and other supporting information. All changes are to be clearly identified. You are invited to submit any errata/corrections to the EIAR, NIS and any other supporting information with your response to this further information request. As above, all changes are to be clearly identified.

The further information referred to above should be received by the Board within 6 months from the date of this notice (i.e. no later than **5.30 p.m. on the 17th November 2025**).

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

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

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

Yours faithfully,



Raymond Muwaniri

Executive Officer

Direct Line: 01-8737125

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