TOBIN

An AtkinsRéalis Company

Appendix E –

Drainage and IPC Licence Condition 10 Draft Cutaway Bog Decommissioning and Rehabilitation Plans Interaction.

BnM

BUILT ON KNOWLEDGE

Derryadd Wind Farm RFI Response – Drainage and IPC Licence Condition 10 Draft Cutaway Bog Decommissioning and Rehabilitation Plans Interaction.

1. Introduction

This text functions as a walkthrough of the illustration drawings attached (BNM_DWF_PN_1001 - BNM_DWF_PN_1004), providing a depiction of the transition between Phases of the proposed development with regards to the drainage system, using selected excerpt (see figure 1 below). The proposed development's drainage will be integrated into the established bog drainage, with additional proposed temporary drainage and / or attenuation measures included.

The proposed rehabilitation measures as outlined in the Draft Cutaway Bog Decommissioning and Rehabilitation Plans (Draft Rehabilitation Plans), in accordance with Condition 10.2.2 of the IPC Licence, will commence upon the completion (and in agreement with the EPA) of the Construction Phase of the proposed development. The rehabilitation measures have been developed to integrate with the wind farm infrastructure. The Draft Rehabilitation Plans are reviewed and updated every two years as per the condition of the licence, with any measures outlined in the plans to be approved in writing by the EPA before their full implementation. Therefore, the Draft Rehabilitation Plans have the flexibility to change, in response to stakeholder consultation and in order to adapt to the evolving conditions and dynamic nature of the site as necessary, ensuring the correct habitat management measures are implemented in the correct place.

Annotated drawings have been provided to explain the drainage function of the proposed development through all project Phases. A projection of the proposed rehabilitation measures to be implemented on site during the operational phase of the proposed development are shown, in an attempt to capture the dynamic nature of the site as presented in the Draft Rehabilitation Plans and detailed in the Surface Water Management Plan in response to item 5 of the FI received from ACP.

Though detailed annotated drawings have been provided in Drawings BNM_DWF_PN_1001 - BNM_DWF_PN_1004 and attached, a sample excerpt from these drawings has been used for the purpose of this note, to assist in the comprehension of

the drainage of the proposed development and the annotated detailed drainage drawings.

2. Existing Drainage System

This subsection details the existing drainage system within the proposed wind farm site and furthermore, overlaid with the proposed development.

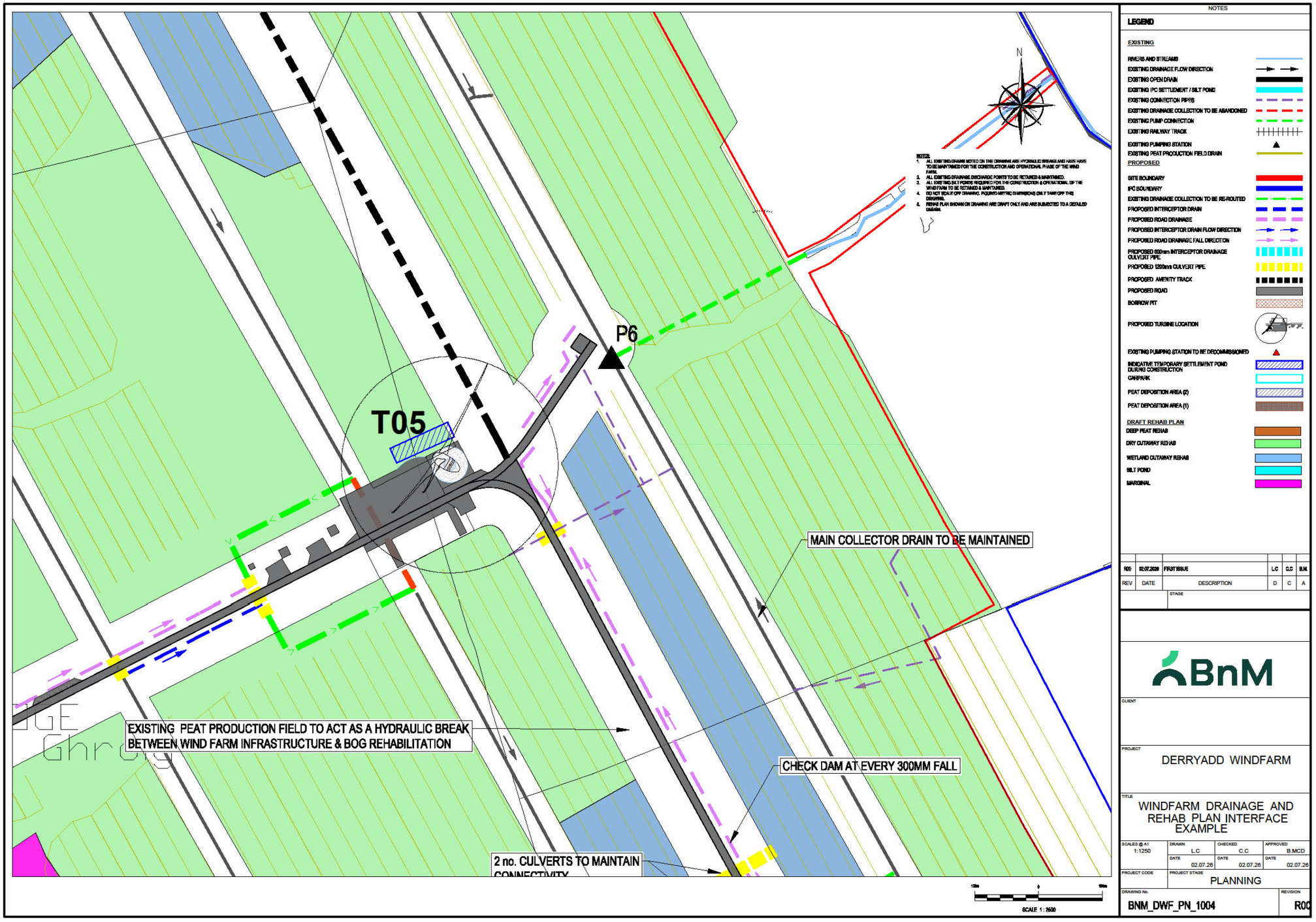
As per Section 3.6.1 of Chapter 3 of the EIAR states that:

> *'The proposed development is located within a former peat extraction site. An extensive network of drainage channels are present throughout the peatland which is managed under IPC licence P0504-01 Mountdillon Bog Group.*
> *The surface of the cutover bog is drained by a network of parallel northwest-southeast generally orientated field drains that are typically spaced every 15 – 20 m. The field drains are approximately 0.5 - 1.5 m deep and in most areas, they intercept the mineral subsoil underlying the peat. These field drains mostly feed into larger surface water drains which drain the main catchments across the three bog formations. The surface water drains are primarily in a northwest-southeast orientation but there are a number of shorter cross drains which intersect the small field drains. There are also a number of pump stations located at low points in the larger drains to direct the surface water to the outfall locations and boundary drains. There are various outfalls on the bog boundaries which comprise mainly pumped outfalls but also some areas of gravity drainage. Surface water draining/pumped from the site is routed via existing IPC settlement / slit ponds (in accordance with the IPC licence requirements) prior to discharge into off-site drainage channels, streams and rivers which ultimately flow into the River Shannon and Lough Ree.'*

Below, is an excerpt Drawing (BNM_DWG_PN_1004) depicting the area around T05 which is located in the northeast of Derryaroge. This excerpt will be used as an example in the following sections to provide a detailed explanation of what can be seen today and what will occur, to provide clarity as a response to item No. 5 of the FI.

Existing drainage at the proposed wind farm site is displayed in yellow/gold field drains and grey collector drains running relatively vertically (northwest to southeast) (refer to Figure 1). P6 indicates a pumping station that is present and will be retained and upgraded by the proposed development while the green dotted line connected to such indicates an existing pump rising main connection that will also be retained and upgraded. These drainage features are currently used to manage the drainage system across the bogs as part of IPC licensing requirements. For further information on IPC licensing see Chapter 3 of the EIAR.

Figure 1 Excerpt from Drainage/Rehab interaction Drawings BNW_DWF_PN_1004



3. Construction Phase Drainage systems

Still using Figure 1 above as an example, during the Construction Phase of the proposed development the turbine hardstand (T05), floating road and amenity track is to be constructed with associated drainage systems. Where drainage is not indicated, over the edge (OTE) drainage will occur into existing field drains.

Immediately north of T05, the indicative temporary settlement pond (blue diagonal hatch) is to be constructed specifically for the Construction Phase surface water management. To the west of the settlement pond, there is a surface water drain indicated in grey flowing southeast. This surface water drain joins the new rerouted drainage (light green line with arrows interspersed) around the T05 hardstand and crane pads. The rerouted drainage avails of a proposed new 1200mm culvert pipe (yellow) beneath the proposed road. The culvert pipe will receive drainage flow from the southwest from both the proposed interceptor drain (blue) south of the road and the road proposed drainage (pink) to the north of the road. The existing drainage (dotted red line) running through proposed turbine hardstand is to be abandoned. The rerouted drainage around the proposed turbine hardstand will join the main collector drains indicated in grey which in this instance flows southeast.

To the east of T05, the proposed floating road connecting from the southeast incorporates roadside drainage (in pink) flowing to the proposed culvert (in yellow) which runs west to east across the proposed floating road. The culverted drainage flow then travels north-northeast across field drains to the surface water drain flowing south to north to P6 (pump station).

The spur of road running northeast from the proposed turbine hardstand towards P6 has roadside drainage to the north that is diverted south via OTE drainage before turning east to join the aforementioned surface water drain to the east.

Upon connecting to P6 the field drain flow will travel via the existing pump connection to the northeast before discharging from the site via an existing silt pond (maintained as per IPC Licence).

Table 1 features an extract of Table 3-6 of Chapter 3 of the EIAR which provides a summary description of the pumping stations for the proposed development. P06 will be retained as part of the proposed development but will be subject to the upgrades detailed below.

Table 1 P06 Upgrade Works Required

P06	Supply and fit the existing Submersible Pump Station with new cover, instrument package and Electrical Control Panel, Complete in all respects including all cabling etc., undertake modifications to pipework as necessary and commission the upgraded pumping station.

The Surface Water Management Plan for the proposed development (Appendix 10.3 of the EIAR) rationalises, that the surface water management plan; *'as designed, will ensure that all water generated during the construction works will be collected and treated before being dispersed overland to the downstream watercourses. The attenuation system will ensure that there will be no increase in flow rates downstream and consequently there will be no increase in flood risk downstream of the site as a result of the proposed development.'*

For comprehensive detail refer to Chapter 3 Project Description of the EIAR for a broader description of the proposed development.

4. Operational Phase Drainage systems

The Operational Phase drainage system is that of the Construction Phase with the exception of the temporary settlement ponds. These will be used for the Construction Phase only (to *ensure construction phase run-off is attenuated and slowly releases into the existing bog drainage systems to mitigate potential construction phase impact on water quality)* and will be removed on completion of the construction works.

As stated in section 3.6.2 of EIAR Chapter 3:

> *'The proposed operation phase drainage design is utilising the existing onsite drainage. Any surface water run-off will make its way into the existing field drains and existing IPC surface water settlement / slit ponds infrastructure before being discharged to the receiving watercourse through existing discharge points by pump or gravity flow. There will be no direct discharges from the proposed wind farm to any existing natural watercourse.'*

For the Operational Phase of the proposed wind farm, as outlined in Table 3-6 of Champer 3 of the EIAR, 13 pumping stations will remain operational. The continued operation of existing pump stations forms a key component of the site drainage system. Pump stations will be maintained and operated throughout the operational life of the wind farm to ensure continued conveyance of surface water through the existing drainage system. Continued operation of the pump stations is necessary to maintain the drainage regime,

manage surface water levels, and ensure the effectiveness of the site's surface water management strategy.

5. Rehabilitation Measures

The key objective of the Draft Rehabilitation Plans[1] is environmental stabilisation and the stabilisation of any emissions from the site that related to the former industrial peat harvesting activities. Rehabilitation is generally defined by the IPC License as:

- stabilisation of bare peat areas via targeted active management (e.g. drain-blocking/re-wetting) slowing movement of water across the site and encouraging a naturally functioning bog ecosystem; and
- mitigation of key emissions (e.g. suspended solids run-off).

Prior to commencement of the rehabilitation phase, the Draft Rehabilitation Plans will be approved by the EPA and will meet the requirements of the IPC licence. During the rehabilitation phase, the natural regeneration of the site will continue, and targeted rehabilitation measures will be commenced as identified in the Draft Rehabilitation Plans (EIAR Appendices 7-2a, 7-2b and 7-2c). The rehabilitation measures will be reviewed and adapted as necessary in response to the evolving conditions and dynamic nature of the site.

As previously stated, the Draft Rehabilitation Plans measures are designed to be incorporated into the proposed development. As such, the proposed rehabilitation measures will commence upon the completion of the Construction Phase of the proposed development.

The existing peat production field annotated in Figure 1 above will act as a hydraulic break between proposed wind farm infrastructure (existing at that point) and rehabilitation measures. The lands indicated as green will be subject to dry cutaway rehabilitation measures (BNM_DWF_PN_1001 - BNM_DWF_PN_1004) and the areas indicated as blue will be subject to wetland cutaway rehabilitation measures.

Table 2 is an adapted extract taken from the Draft Rehabilitation Plans (appendices 7-2a, 7-2b and 7-2c) displaying an example of the rehab measures that may be deployed for different habitats e.g. dry cutaway, wetland cutaway etc.

[1] Note: in this context decommissioning refers to that of the IPC licensed site, not to be confused with decommissioning of the proposed wind farm. Refer to APPENDIX VI. of the Draft Decommissioning and Rehabilitation Plan for further details on decommissioning.

Table 2: Sample Rehab Measures (Draft Decommissioning and Rehabilitation Plans)

Type	Code	Description
Deep peat cutover bog	DPT1	Regular drain blocking (3/100 m) + modifying outfalls and managing water levels with overflow pipes.
Dry cutaway	DCT1	Modifying outfalls and managing water levels with overflow pipes.
Wetland cutaway	WLT1	Turn off or reduce pumping to re-wet cutaway + modifying outfalls and managing water levels with overflow pipes.
Marginal land	MLT1	No work required.
Silt Pond	Silt Pond	Silt Pond.

Note, the rehabilitation measures will be reviewed and agreed with the EPA in advance to the plans being finalised. They will also have regard to feedback from stakeholder consultation which will be carried out in advance of finalisation of the plans.

6. Proposed Development Decommissioning

The Decommissioning Phase of the proposed development will utilise the proposed Operational Phase drainage system and follow future best practise decommissioning measures in place in approximately 2063 to minimise effects.

By the time of the decommissioning of the proposed development, the rehabilitation of the site will have occurred in line with the Rehabilitation Plans (once finalised). It is envisaged that the IPC license will have been surrendered by this point, the rehab measures implemented and the pumping stations used for the Operational Phase of the Wind Farm, left in-situ to manage water levels appropriately, if required.

Section 3.13 of Chapter 3 of the EIAR describes the wind farm decommissioning in detail. The key components are that:

Following the end of the wind turbine lifespan (approx. 30 years), the proposed development will be decommissioned, with the exception of the electricity substation, amenity access tracks and associated infrastructure e.g. car parks, access etc. Upon decommissioning of the proposed wind farm, the wind turbines would be disassembled in reverse order to how they were erected. Turbine foundations would remain in place underground and would be covered with earth and allowed to revegetate or reseed as appropriate. Leaving the turbine foundations in-situ is considered a more environmentally prudent option.

The majority of the site roadways will be in use for additional purposes to the operation of the windfarm (such as a mature amenity and recreational use) by the time the decommissioning of the project is to be considered, and therefore it will be more appropriate to leave the site roads in-situ for future use.

The proposed Substation, grid connection and associated infrastructure will remain in place as it will be under the ownership and control of ESB Networks and/or EirGrid and will form a permanent part of the national electricity grid.

7. Summary

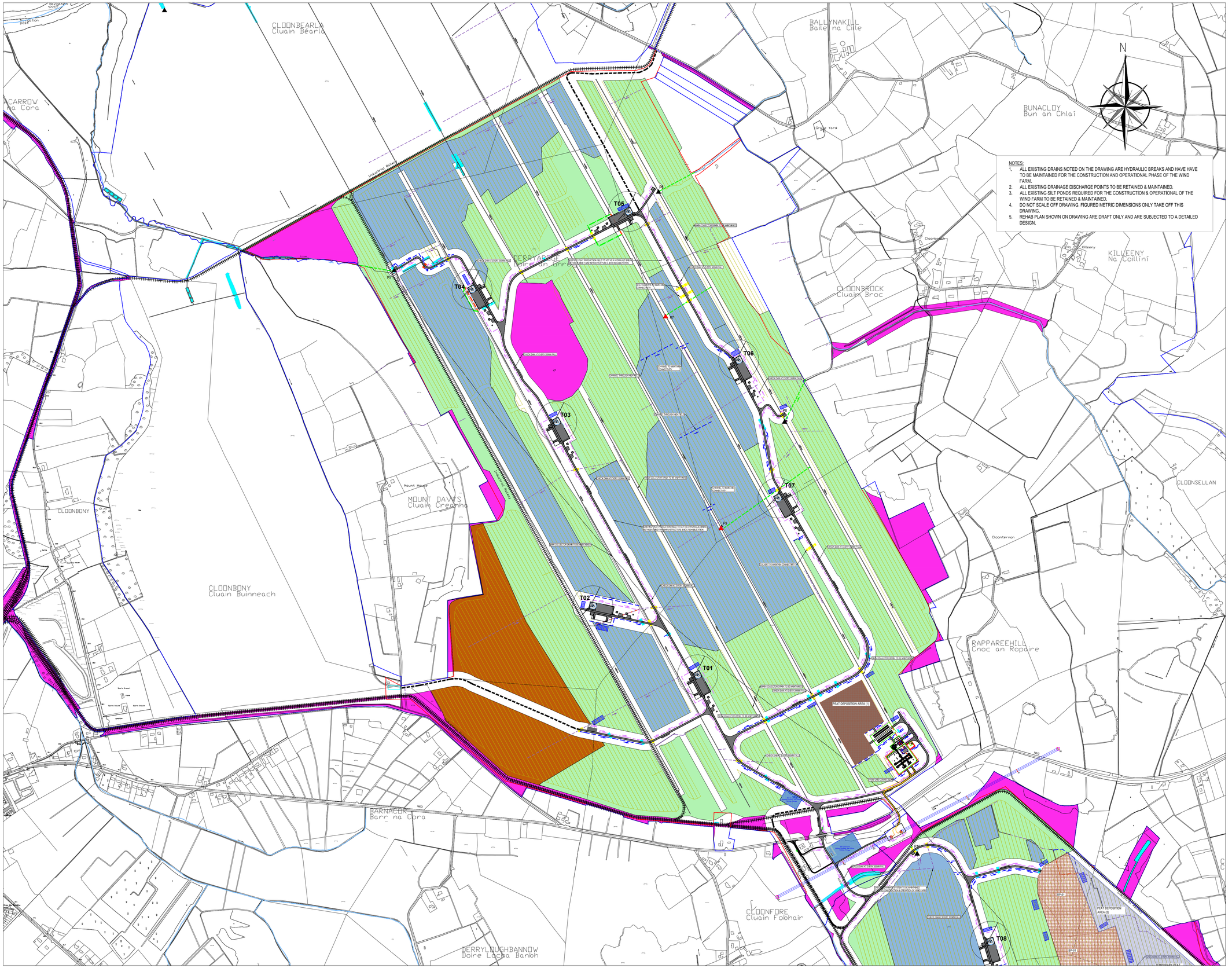
Table 3 provides a summary of the drainage approaches used throughout all Phases of the proposed development.

Table 3: Summary of Proposed Development Drainage Approaches

Phase	Drainage Approach
Existing	Existing field drains, collector drains and pumps manage site water levels. IPC silt ponds and discharge locations are also present.
Construction	Temporary settlement ponds and rerouted drains to manage construction runoff, road drainage, interceptor drains, OTE drainage that is incorporated into existing onsite drainage.
Operation	Operational drainage will be as per construction phase drainage system with the removal of temporary measures.
Decommissioning and Rehabilitation (IPC requirement)	Rehabilitation measures implemented and adapted over time while maintaining the drainage infrastructure required for the operation and environmental management of the wind farm.
Decommissioning (of Wind Farm)	Existing, in-situ operational drainage system to be used and pumping stations will be retained where required.

In summary, the proposed drainage strategy maintains continuity of water management throughout all project phases. Existing drainage system and pumping stations will continue to operate during Construction Phase, Operation Phase, IPC Condition 10.2 rehabilitation and decommissioning Phase of the project, ensuring compliance with site

drainage requirements while facilitating the implementation of the proposed rehabilitation measures ultimately working towards decommissioning and rehabilitation of the site in accordance with IPC license requirements.



NOTES:

1. ALL EXISTING DRAINS NOTED ON THE DRAWING ARE HYDRAULIC BREAKS AND HAVE HAVE TO BE MAINTAINED FOR THE CONSTRUCTION AND OPERATIONAL PHASE OF THE WIND FARM.
2. ALL EXISTING DRAINAGE DISCHARGE POINTS TO BE RETAINED & MAINTAINED.
3. ALL EXISTING SILT PONDS REQUIRED FOR THE CONSTRUCTION & OPERATIONAL OF THE WIND FARM TO BE RETAINED & MAINTAINED.
4. DO NOT SCALE OFF DRAWING. FIGURED METRIC DIMENSIONS ONLY TAKE OFF THIS DRAWING.
5. REHAB PLAN SHOWN ON DRAWING ARE DRAFT ONLY AND ARE SUBJECTED TO A DETAILED DESIGN.

NOTES

LEGEND

EXISTING

- RIVERS AND STREAMS
- EXISTING DRAINAGE FLOW DIRECTION
- EXISTING OPEN DRAIN
- EXISTING IPC SETTLEMENT / SILT POND
- EXISTING CONNECTION PIPES
- EXISTING DRAINAGE COLLECTION TO BE ABANDONED
- EXISTING PUMP CONNECTION
- EXISTING RAILWAY TRACK
- EXISTING PUMPING STATION
- EXISTING PEAT PRODUCTION FIELD DRAIN

PROPOSED

- SITE BOUNDARY
- IPC BOUNDARY
- EXISTING DRAINAGE COLLECTION TO BE RE-ROUTED
- PROPOSED INTERCEPTOR DRAIN
- PROPOSED ROAD DRAINAGE
- PROPOSED INTERCEPTOR DRAIN FLOW DIRECTION
- PROPOSED ROAD DRAINAGE FALL DIRECTION
- PROPOSED 600mm INTERCEPTOR DRAINAGE CULVERT PIPE
- PROPOSED 1200mm CULVERT PIPE
- PROPOSED AMENITY TRACK
- PROPOSED ROAD
- BORROW PIT
- PROPOSED TURBINE LOCATION
- EXISTING PUMPING STATION TO BE DECOMMISSIONED
- INDICATIVE TEMPORARY SETTLEMENT POND DURING CONSTRUCTION
- CARPARK
- PEAT DEPOSITION AREA (2)
- PEAT DEPOSITION AREA (1)

DRAFT REHAB PLAN

- DEEP PEAT REHAB
- DRY CUTAWAY REHAB
- WETLAND CUTAWAY REHAB
- SILT POND
- MARGINAL

REV	DATE	DESCRIPTION	D	C	A
R00	02.07.2026	FIRST ISSUE	L.C	C.C	B.M.

STAGE

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CLIENT

PROJECT

DERRYADD WINDFARM

TITLE

WINDFARM DRAINAGE AND REHAB PLAN INTERFACE DERRYAROGE

SCALES @ A1	DRAWN	CHECKED	APPROVED
1:10000	L.C	C.C	B.MCD
	DATE 02.07.26	DATE 02.07.26	DATE 02.07.26

PROJECT CODE

PROJECT STAGE: PLANNING

DRAWING No.: BNM_DWF_PN_1001

REVISION: R00

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100m 0 100m

SCALE 1 : 2500

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PROJECT

DERRYADD WINDFARM

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WINDFARM DRAINAGE AND REHAB PLAN INTERFACE DERRYADD

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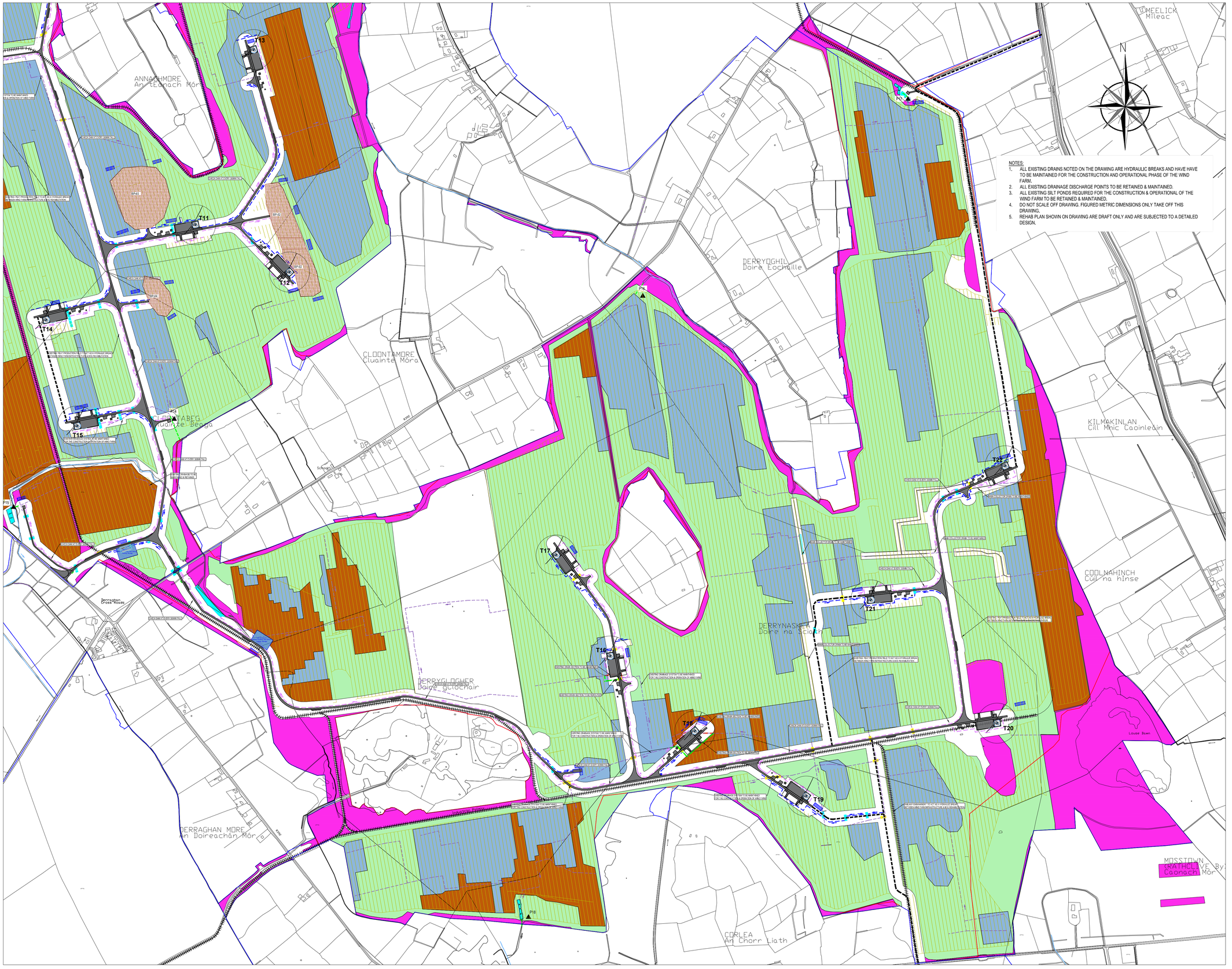
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DRAWING No.

BNM_DWF_PN_1002

REVISION

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STAGE

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PROJECT
DERRYADD WINDFARM

TITLE
WINDFARM DRAINAGE AND REHAB PLAN INTERFACE LOUGH BANNOW

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PROJECT CODE	PROJECT STAGE
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T05

P6

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MAIN COLLECTOR DRAIN TO BE MAINTAINED

EXISTING PEAT PRODUCTION FIELD TO ACT AS A HYDRAULIC BREAK BETWEEN WIND FARM INFRASTRUCTURE & BOG REHABILITATION

CHECK DAM AT EVERY 300MM FALL

2 no. CULVERTS TO MAINTAIN CONNECTIVITY

100m 0 100m

SCALE 1 : 2500

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PROJECT

DERRYADD WINDFARM

TITLE

WINDFARM DRAINAGE AND REHAB PLAN INTERFACE EXAMPLE

SCALES @ A1	DRAWN	CHECKED	APPROVED
1:1250	L.C	C.C	B.MCD
	DATE 02.07.26	DATE 02.07.26	DATE 02.07.26

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