TOBIN

An AtkinsRéalis Company

Case Number ABP – 322485-25

Derryadd Wind Farm

Response to Further Information Request

BnM

BUILT ON KNOWLEDGE

Table of Contents

1. Intoduction 1

2. Response to Further Information 3

Appendices

Appendix A ACP Further Information Letter 30th March 2026

Appendix B Revised Stage 1 Appropriated Assessment Screening and Stage 2 Appropriate Assessment Natura Impact Statement

Appendix C EIAR Addendum Report

Appendix D Derryadd Wind Farm: Collision Risk Modelling Report (GITTINGS, 2026)

Appendix E Drainage and IPC Licence Condition 10 Description

List of Tables

Table 2-1 Response to FI Items 1-5 4

1. INTODUCTION

TOBIN (An Atkins Realis Company) have been instructed by our client, Bord na Móna Powergen Limited, (the Applicant) to prepare this report in response to a Further Information request (FI) issued by An Coimisiún Pleanála (Formerly, An Bord Pleanála) (ABP-322485-25) on 30th March 2026. The Response to the request for Further Information (FI) is being made regarding a proposed renewable energy development which will comprise 22 no. Wind Turbines & 1 no. 110 kV Electrical Substation & all associated works (hereafter referred to as the proposed development) within the townlands of Aghamore, Annaghbeg, Ards, Ballynakill, Barnacor, Cloonbearla, Cloontabeg, Derraghan Beg/More, Deryad, Derrynaskea, Grillagh, Kilmakinaln, Kilnacarrow, Lyneen, Mosstown, Mount Davys, Rappareehill, at Lanesborough, Co. Longford, and Ballypheasan, Co. Roscommon. The proposed development meets the threshold for Infrastructure Development as set out in the Seventh Schedule of the Planning and Development Act 2000, as amended (ABP Case Ref. 314965-22). Therefore, the planning application was submitted directly to An Coimisiún Pleanála (ACP) as a Strategic Infrastructure Development (SID) in accordance with Section 37E of the Planning and Development Act 2000, as amended.

The Applicant is seeking a 10-year planning permission and a 30-year operational life from the date of commissioning of the entire wind farm. This application was submitted to the Commission on the 9th May 2025 (case number ABP-322485-25).

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

"The proposed development will comprise of the following:

- *22 no. wind turbines with a blade tip height of 190 m, blade rotor diameter of 165 m, hub height of 107.5 m and the associated infrastructure including tower sections, nacelle, hub, and rotor blades and all associated foundations and hard-standing areas in respect of each turbine;*
- *New internal site access roads, approximately 27,500 m in length including passing bays and associated drainage;*
- *2 no. permanent Meteorological Masts, both of which will be 120 m in height, and associated hardstanding areas for both masts, as well as the decommissioning and removal of an existing 100 m Meteorological Mast on site in Lough Barrow Bog;*
- *4 no. Borrow pits in Derryadd Bog; All works associated with the opening, gravel and spoil extraction, and decommissioning of the borrow pits;*
- *4 no. temporary construction compounds, including material storage, site welfare facilities, and site offices;*
- *4 no. temporary security cabins at the main construction site entrances as well as at a number of access points around the proposed wind farm site;*
- *1 no. 110 kV electrical substation compound in Derryaroge Bog. The substation will consist of 2 no. control buildings, a 36 m high telecommunications tower, associated electrical plant and equipment, ground water well, wastewater holding tank and welfare facilities.*
- *All associated underground electrical and communications cabling connecting the turbines and masts to the proposed electrical substation, including road crossing at N63 and associated grid connection via a 110 kV loop-in connection to the existing Lanesborough-Richmond 110 kV overhead line which traverses the proposed wind farm site;*

- *1 no. 16 MW battery storage facility;*
- *2 no. Peat Deposition Areas, one to the north of the proposed substation compound in Derryaroge Bog and one in Derryadd Bog;*
- *New site access entrances, temporary improvements and modifications to existing public road infrastructure to facilitate delivery of abnormal loads including locations on N6 Eastbound Slip Road, N6/N61 Roundabout at Athlone, N61/N63 Roundabout at Roscommon, N63 Roscommon Arts Centre Roundabout and N61/N63 Roundabout, Northeast of Roscommon.*
- *Hinge 3 No. permanent lighting fixtures in Folio RN40465F in Roscommon town to facilitate the delivery of abnormal loads (i.e. turbine blades);*
- *Approximately 7,500 m of dedicated amenity access tracks to provide linkages between the proposed wind farm site roads, royal canal greenway (to the east), the Corlea Visitor Centre amenity areas (to the south) and the Midlands Trail Networks project (to the north);*
- *3 no. permanent amenity carparks, one of which is situated in Derryaroge Bog (19 no. car parking spaces in total) and two carparks in Derryadd Bog (19 no. car parking spaces in each carpark);*
- *All associated site work and ancillary works including new drainage and updating existing drainage, access road, earthworks, site reinstatement and erosion control, which will be aligned with the existing and future site rehabilitation plans; and,*
- *A 10-year planning permission is being sought with a 30-year operational life from the date of commissioning of the entire wind farm."*

On the 15th September 2025, a further letter was issued by the Commission inviting the Applicant to make a submission in response to further observations received in relation to the live SID planning application before them for consideration. The Response to Submission's documentation following the Commission's request was submitted on the 13th October 2025.

On the 30th of March 2026, the Applicant was requested by the Commission to provide further information on a number of points, in accordance with section 37F (1)(a) of the Planning and Development Act 2000, as amended. The Commission has requested, as part of the response format and timeframe of the ACP Further Information (FI) request, that particular points of FI be addressed by way of an addendum to the previously submitted Environmental Impact Assessment Report (hereafter referred to as "the EIAR") as relevant, and should clearly indicate where changes to the original documents are made.

2. RESPONSE TO FURTHER INFORMATION

This section of the Response to Further Information 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 ACP (case number ABP-322485-25) has also been enclosed with this FI Response as Appendix A in the interest of clarity.

The Commission has requested, as part of the response format and timeframe of the ACP FI request, that particular points of the FI be addressed by way of an addendum to the previously submitted Environmental Impact Assessment Report (hereafter referred to as "the EIAR") as relevant, and should include changes to the original documents as necessary. As a result of this request, an EIAR Addendum Report (hereafter referred to as "the Addendum") is included as Appendix C of the response to FI and associated appendices have been updated where relevant and are titled EIAR Addendum Appendices.

Similarly, the Commission has requested an addendum to the Natura Impact Statement (NIS) to address item no. 1 of the FI letter. The original application was supported by a combined Appropriate Assessment Screening Report (AASR) and NIS. This combined report has been updated to show the additional analyses, clarifications and supporting information required to address the matters raised in the FI, which is now titled 'Revised Stage 1 Appropriated Assessment Screening and Stage 2 Appropriate Assessment Natura Impact Statement' and included as Appendix B of this response to FI.

A revised combined Revised Stage 1 Appropriated Assessment Screening and Stage 2 Appropriate Assessment Natura Impact Statement' was prepared rather than a standalone addendum to the previously submitted (AASR) - NIS This approach ensured that all matters raised by ACP in relation to Appropriate Assessment were addressed within a single, consolidated assessment document. It also enabled matters raised by ACP in relation to Biodiversity and Ornithology assessments presented within the EIAR, to be fully considered and aligned with the revised Appropriate Assessment documentation.

The preparation of the revised NIS was considered the most robust and transparent approach, as it enabled the original assessment to be reviewed against the published SSCOs for Lough Ree SPA and incorporated the additional analyses, clarifications and supporting information required by the RFI within a single document. It also ensured consistency between the Stage 1 Screening Assessment and the Stage 2 Appropriate Assessment, providing a basis to inform ACP's Appropriate Assessment of the proposed development.

The above discussed documents (The Addendum, Revised AASR-NIS) have been clearly referenced, where relevant, to address each of the individual FI items. Table 2-1 sets out an itemised Response to the Further information requested by the Commission.

Table 2-1 Response to FI Items 1-5

Request for Further Information (FI) Item No.	Query/Request	Response to Further Information (FI)
Item No. 1 - Site specific conservation objectives Lough Ree SPA (004064) (NPWS, April 2025).		
Note: Item No. 1 of the ACP FI is split into 5 interrelated tasks (1a – 1e) with 5 tailored responses provided below.		
I	*"The Commission notes that since the planning application was lodged, site specific conservation objectives have been published for Lough Ree SPA (004064) (NPWS, April 2025).* *The applicant is requested to provide an updated detailed assessment of the implications of the proposed development in view of the site-specific conservation objectives and the attributes and targets required to meet these objectives for the species for which the SPA is designated.* *Of particular concern is impacts on the listed population of **Whooper Swan**, the conservation objective of which is to **restore favourable conservation condition**.* *The Commission is of the view that the assessment based on generic conservation objectives presented in the Natura Impact Statement is not adequate to address implications for the integrity of the SPA in view of the site specific conservation objectives in particular those which relate to ecologically important areas outside of the SPA of which the proposed development*	**1a) Review of Site-Specific Conservation Objectives (SSCOs) for Lough Ree SPA** The ACP FI request noted that Site-Specific Conservation Objectives (SSCOs) for Lough Ree SPA (004064) were published by the National Parks and Wildlife Service (NPWS) following lodgement of the planning application for the proposed development in April 2025 The proposed development planning application was accompanied by a combined Appropriate Assessment Screening Report (AASR) and Natura Impact Statement (NIS). The FI requested an updated assessment of the implications of the proposed development in view of these SSCOs, including the relevant conservation objectives, attributes and targets. ACP also requested an updated Stage 1 Appropriate Assessment Screening and Stage 2 Appropriate Assessment, together with clarification regarding collision risk modelling, mortality thresholds and the population levels used in the assessment of SPA bird populations. A revised combined Stage 1 Appropriated Assessment Screening and Stage 2 Appropriate Assessment Natura Impact Statement was prepared rather than a standalone addendum to the previously submitted NIS. This approach ensured that all matters raised by ACP in relation to Appropriate Assessment were addressed within a single, consolidated assessment document. It also enabled matters raised by ACP in relation to Biodiversity and Ornithology assessments presented within the EIAR, to be fully considered and aligned with the revised Appropriate Assessment documentation. This included: 1. Detailed assessment of the Special Conservation Interest (SCI) species Whooper Swan, including the potential role of ecologically important areas outside the SPA as current and future supporting habitat associated with bog rehabilitation,

	site could be considered to comprise, now, and in the future in view of bog rehabilitation plans. *The revised assessment should consider all potential impacts against targets and attributes as relevant to the listed bird species and where the conservation objective is to restore favourable conservation condition, provide detail on how the proposed development (alone or in combination with other plans and project) will not delay or prevent that objective for the SPA.* *In addition, the Commission seeks clarification on the exact population levels used in the estimation of increase in background mortality as part of the Collision Risk Model assessment for the Lough Ree* ***SPA populations.*** *The Commission notes that the significance of predicted collision risk is considered at National scale and regional or local scale as described in the Collision Risk Model Report, EIAR Appendix 8.4 prepared by Tom Gittings. The population reference level used for Lough Ree appears to incorporate a wider area (see Section 2.7, page 22) and thus higher numbers of birds than for which the SPA baseline was determined. Therefore, that being the case, the Commission requests that an updated estimate of mortality thresholds is provided for the relevant species listed for Lough Ree as defined by the* ***SPA population*** *cited in the Conservation objectives.* *The updated assessment for Lough Ree SPA should be provided as an addendum to the Natura Impact Statement and should include a revised screening stage and detailed assessment (stage 2) in view of the site specific conservation objectives to inform the Commission's Appropriate Assessment of the implications of the proposed development on the integrity of the SPA."*	having regard to the species-specific conservation objective to restore the SCI species to favourable conservation condition (refer to Item 1b); 2. Clarification of the population baselines used in the Collision Risk Model assessment (refer to **Item 1c**); and 3. Updated mortality threshold calculations using the SPA population figures contained within the 2025 SSCOs (refer to **Item 1d**). The preparation of the revised combined AASR and NIS was considered the most robust and transparent approach, as it enabled the original assessment to be reviewed against the published SSCOs for Lough Ree SPA and incorporated the additional analyses, clarifications and supporting information required by the RFI within a single document and provide a basis to inform ACP's Appropriate Assessment of the proposed development. It should be noted that ACP also requested additional assessments to take into account the dynamic nature of the proposed wind farm site, including consideration of the likely future receiving environment following ongoing decommissioning and rehabilitation activities (refer to **Item 2** below). In response, an Addendum to the EIAR was prepared (Appendix C of this report) to assess the Likely Future Receiving Environment and the potential implications of continuing habitat development and natural regeneration across the proposed wind farm site. The revised AA reporting (Appendix B of this report) has taken account of the findings of the EIAR Addendum, particularly those aspects relating to Biodiversity and Ornithology, including the assessment of rehabilitated and rehabilitating bog habitats that may function as ecologically important areas outside Lough Ree SPA and as supporting habitat for SPA SCI bird species. This ensured that the revised combined AASR - NIS considered both the current environmental baseline and the Likely Future Receiving Environment arising from ongoing rehabilitation and habitat evolution across the Application Site. **1b) Ecologically Important Areas Outside the SPA and Whooper Swan Assessment** Related to the above **Item 1a**, the Commission noted that the original NIS assessment did not adequately address the implications of the proposed development for ecologically important areas outside Lough Ree SPA that may function as supporting habitat for SPA bird species, including the potential future role of rehabilitated bog habitats within the Application Site. In response, the revised AA reporting (Appendix B of this report) has included a targeted assessment of the current ecological function of habitats within the Application Site, including potential for future habitat development arising from rehabilitation measures.

		The assessment considered whether the proposed development could adversely affect the availability, suitability or use of these habitats by SPA bird species. The revised NIS examines potential habitat change, displacement, and disturbance across all phases of the project. The revised Appropriate Assessment concluded that the project, either alone or in-combination with other plans, will not delay or prevent the restoration of the SCI species of the SPA to favourable conservation condition, having regard to 2025 attributes and conservation targets. Consequently, the proposed development will not adversely affect the integrity of any European site. As noted above, the revised NIS has taken account of the Biodiversity and Ornithology assessments contained within the EIAR Addendum prepared in response to Item 2 of the Commission's request for FI. In particular, the assessment considered both the existing environmental baseline and the Likely Future Receiving Environment arising from ongoing rehabilitation, natural regeneration and habitat evolution across the Application Site. Accordingly, the revised Appropriate Assessment considered the potential role of rehabilitated and rehabilitating bog habitats as supporting habitat for SPA SCI bird species and assessed the implications of the proposed development on those habitats and associated ecological functions.
		1c) Related to Item 1a, ACP sought a focused evaluation of the impacts of the proposed development on the restoration objective for the SCI species Whooper Swan. In response, the revised AA reporting (Appendix B of this report) includes a targeted assessment of Whooper Swan, having regard to the 2025 Site-Specific Conservation Objectives for Lough Ree SPA and the species-specific conservation objective to restore the SCI species to favourable conservation condition. The assessment also considered the Likely Future Receiving Environment associated with natural regeneration and habitat evolution, and ongoing rehabilitation within the Application Site. The revised AA reporting considered the potential effects of the proposed development, either alone or in-combination with other plans and projects, on Whooper Swan, including potential effects arising from habitat loss, habitat change, displacement and disturbance. The revised NIS concluded that the project, either alone or in-combination with other plans and projects, will not delay or prevent the restoration of Whooper Swan to favourable conservation condition, having regard to the 2025 attributes and conservation

		targets. Consequently, the proposed development will not adversely affect the integrity of Lough Ree SPA.
		1d) Collision Risk Model Population Baselines The Commission required clarification of the exact population levels used in the Collision Risk Assessment (CRM) in the estimation of the potential increase in mortality by wind turbine collisions to the Lough Ree SPA Whooper Swan population. The Commission noted that the *"population reference level used for Lough Ree appears to incorporate a wider area"* and requested an updated estimate of mortality thresholds for *"the relevant species listed for Lough Ree as defined by the SPA population cited in the conservation objectives"*. In response, the collision risk assessment has been updated using the baseline and recent population estimates contained in the conservation objectives for Lough Ree SPA (NPWS 2025). Accordingly, the assessment is now based on the SPA population figures identified in the 2025 Site-Specific Conservation Objectives, rather than broader population reference levels, thereby ensuring consistency with the conservation objectives and facilitating a direct assessment of potential effects on the SPA populations. Appendix D of this report, prepared by Tom Gittings on behalf of the Applicant, provides clarity with regards to the exact population levels used in the CRM.
		1e) Updated Mortality Threshold Assessment Related to the above item 1d, the Commission requested an updated estimate of mortality thresholds for *"the relevant species listed for Lough Ree as defined by the SPA population cited in the conservation objectives"*. In response, mortality threshold calculations were reviewed and updated using the SPA population figures contained within the 2025 Site-Specific Conservation Objectives for Lough Ree SPA. This enables the predicted collision mortality arising from the proposed development to be assessed directly against the relevant SPA populations and associated conservation objectives. Revised mortality thresholds and corresponding increases in annual mortality are presented in Appendix D of this report, prepared by Tom Gittings on behalf of the Applicant. Appendix D also presents the outcomes of the revised assessment and demonstrates that the conclusions of the collision risk assessment remain unchanged. The revised NIS has incorporated the findings of Appendix D into the Appropriate Assessment and concludes that the predicted collision mortality does not give rise to

		adverse effects on the integrity of Lough Ree SPA, either alone or in-combination with other plans or projects.
		Summary Following publication of the 2025 SSCOs for Lough Ree SPA, the Applicant prepared a revised NIS to address the Commission's requests in relation to Appropriate Assessment and related queries regarding the Biodiversity and Ornithology assessments presented within the EIAR. The revised NIS incorporated a targeted assessment of SPA SCI species, including Whooper Swan, consideration of ecologically important areas outside the SPA that may function as supporting habitat, clarification of the population baselines used in the collision risk assessment, and updated mortality threshold calculations based on the 2025 SSCO population figures. In parallel, and in response to the Commission's request for consideration of the dynamic nature of the Application Site and the Likely Future Receiving Environment, an EIAR Addendum was prepared to assess the implications of ongoing decommissioning, rehabilitation, natural regeneration and habitat evolution across the Application Site. The revised NIS took account of the findings of this EIAR Addendum, ensuring that the Appropriate Assessment considered both the current environmental baseline and the Likely Future Receiving Environment. The revised Appropriate Assessment concluded that the project, either alone or in-combination with other plans and projects, would not delay or prevent the restoration of SPA SCI species to favourable conservation condition and would not adversely affect the integrity of Lough Ree SPA or any other European site.
Item No. 2 – Dynamic Nature of the Proposed Wind Farm Site		
2	*"The Commission notes the concerns outlined in the submissions received regarding the interplay between the draft cutaway bog decommissioning and rehabilitation works on the proposed wind farm development, the baseline characterisation and the dynamic nature of the site, and concerns that baseline surveys are unlikely to capture the current improved*	The Commission seeks clarity as to whether the EIAR baseline represents the findings at the time of surveys or whether consideration has been given to the Likely Future Receiving Environment following further bogland rehabilitation and completion of decommissioning on site. In response, the EIAR baseline characterisation represents the environmental conditions identified through the surveys and assessments undertaken for the proposed development as detailed within each EIAR chapter. The baseline surveys therefore represent the existing environment/receiving environment at the time the relevant EIAR surveys were undertaken and have not been retrospectively amended to reflect

	ecological value of the site arising from natural regeneration. *It is also noted that decommissioning works on the site are still ongoing and an application for substitute consent for historic peat harvesting is currently before the Commission.* *Having regard to the above, the Commission seeks clarity as to whether the EIAR baseline represents the findings at the time of surveys or whether consideration has been given to the likely future receiving environment following further bogland rehabilitation and completion of decommissioning on site.* *In carrying out the EIA, it is necessary to measure impact against a definitive baseline to appropriately assess the actual impact of the proposed development thereby requiring clarity on the appropriate environmental baseline. This is particularly the case for the water, soils, climate and biodiversity environmental factors.* *The applicant should, therefore, consider the presentation of two scenarios ("existing" and "likely future receiving environment") as the environmental baseline for the relevant environmental factors addressed in the EIAR and a revised EIAR or an Addendum to the existing EIAR should be submitted to the Commission.*"	subsequent changes in site conditions in the current intervening period as a result of natural regeneration. In response to the Commission's request, the Applicant has therefore considered the anticipated environmental baseline (Likely Future Receiving Environment) by way of an Addendum to the EIAR (Appendix C of this report) for the following specific phases of the proposed development, namely: • The current intervening period between the submission of the planning application through to the granting of planning permission, if granted, currently anticipated to be approximately 2026–2030. • The Construction Phase is assumed to commence approximately five years in the future, in 2031, and continue for 2 years until 2033. • Operational Phase is anticipated to commence in 2033 and continue for the 30-year operational lifespan of the proposed project, until approximately 2063. Targeted rehabilitation measures will be carried out immediately after the completion of the Construction Phase i.e. during the Operational Phase of the proposed development. • Decommissioning Phase is anticipated to commence following the Operational Phase and continue for an undefined period of time. The Addendum provides an overview of the conditions within the Likely Future Receiving Environment that are predicted to differ from the baseline environment, as described in original EIAR, at the time of Construction, during the Operational and Decommissioning Phases, and assesses any likely significant effects due to the proposed development activities. In order to establish the Likely Future Receiving Environment for each of the Phases described above, it is important to highlight Section 2.1.1.1 of Chapter 2 of the original EIAR which details the Integrated Pollution Control (IPC) Licence (Reg. No. P0504-01), licensed by the Environmental Protection Agency (EPA), the proposed wind farm site is subject of. Section A1.5 of the addendum (Appendix C) provides further understanding of the evolution and ongoing implementation of The Draft Rehabilitation Plans (included in Appendix 7-2a – 7-2c of the EIAR) as required by Condition 10 of the IPC License.

		The Addendum follows the same structure as the previously submitted EIAR to facilitate review of relevant changes or updates. The following Chapter Addendums are included in Appendix C of this report in response to the FI request: • Chapter 1 Introduction; • Chapter 7 Biodiversity; • Chapter 8 Ornithology; • Chapter 9 Lands, Soils and Geology; • Chapter 10 Hydrology and Hydrogeology; • Chapter 18 Climate; and, • Chapter 21 Schedule of Mitigation Measures. It is not intended that the Addendum replaces the submitted EIAR, rather the Addendum is read in conjunction with the submitted EIAR. Only the sections of the EIAR where relevant changes or updates have been identified are provided. **Summary** Having regard to the above, the Applicant confirms that the EIAR baseline represents the conditions identified at the time of the relevant surveys. The Applicant has also considered the Likely Future Receiving Environment as a result of ongoing decommissioning and rehabilitation measures and the continued natural revegetation of the proposed wind farm site. The relevant amendments and/or clarifications to the EIAR arising from this assessment are provided in Appendix C of this report with particular regard to Biodiversity, Ornithology, Lands Soils and Geology, Hydrology and Hydrogeology, and Climate. The assessment of the Likely Future Receiving Environment demonstrates that, while ongoing decommissioning, rehabilitation and natural revegetation will result in changes to site conditions over time, these changes do not materially alter the findings of the EIAR. The conclusions of the EIAR therefore remain valid and robust having regard to both the existing baseline environment and the anticipated Likely Future Receiving Environment throughout the lifecycle of the proposed development. Accordingly, the Addendum concludes that consideration of the Likely Future Receiving Environment does not alter the findings of the EIAR. No additional adverse effects have been identified and the significance of the effects assessed in the EIAR remains unchanged.

		No significant adverse effects have been identified as a result of considering the Likely Future Receiving Environment.
Item No. 3 – Carbon Emissions taking into consideration pumped drainage and oxidation of exposed peat.		
3	*"Provide an estimation of carbon emissions in a "do nothing" and a "do something" scenario taking into consideration pumped drainage and oxidation of exposed peat. Provide a baseline of existing CO_2 emissions from existing drainage and assess the carbon emission benefits of allowing for the site to naturally regenerate as a biodiversity rich carbon sink in the absence of wind farm development."*	GHG emissions arising in the do-nothing (Existing Environment and Likely Future Receiving Environment prior to construction) scenario have been quantified in Section A18.4.1 of the EIA Addendum (see Appendix C of this report). GHG emissions were quantified on the basis that the Existing Environment is peatland in a degraded condition which has undergone no targeted rehabilitation to date. Contrary to the comment by ACP, Renou- Wilson et al. (2018) found that degraded peatland, in the absence of re-wetting or re-establishment of peat forming processes, such as this, will continue to act as a source of GHG emissions until they are either rewetted/revegetated, the peat is removed, or all the remaining peat has oxidised. Although some natural revegetation may have occurred, this is different to peat regeneration, which requires the re-establishment of peat forming processes, typically through the restoration of hydrological conditions, which to date is not in a state of regeneration. Therefore, the subject site is considered a source of CO2e and there are no 'emission benefits of allowing for the site to naturally regenerate'. This is set out in more detail in Section A18.3.1 of the addendum (Appendix C). GHG emissions from the 'do- something' (Construction phase, Operational phase and Likely Future Receiving Environment post construction) scenario have been quantified in Sections 18.4.2 and 18.4.3 of the original EIAR, and consider emissions from land use change over time, construction emissions and the beneficial impact of wind turbines through the displacement of fossil fuels to generate electricity. To summarise, GHG emissions for the 'do - nothing' and 'do- something' scenarios have been calculated.
Item No. 4 - Construction Phase Greenhouse Gas Emissions		
4	*"The Response to Submissions Report, Section 11, has set out that the area to be affected by construction and operation of the proposed development is 78ha with 38ha to be reinstated post construction. Therefore, the permanent development footprint is c.40ha for which reinstatement and rehabilitation will not occur if the*	Table A18.2 of the Climate Chapter Addendum (Appendix C) sets out GHG emissions associated with land use change across the site. The 40ha of permanently disturbed bog has been quantified separately, acknowledging that it will not be subject to rehabilitation plans. GHG emissions associated with the 38ha of land which will be re-instated are quantified, as is the remaining site footprint.

	proposed development is constructed. Table 18.6 Construction Phase Greenhouse Gas Emissions provides a total value of tonnes CO2e for the construction phase. *It is recommended that this is updated to take account of the loss of bog area (c. 40ha) that would otherwise be rehabilitated if the proposed development were not to proceed."*	
Item No. 5 – Proposed Drainage and how it will transition in the Operation and Decommissioning Phases		
5	*"Appendix 7-2 of the EIAR provides Draft Cutaway Bog Decommissioning and Rehabilitation Plans for the site. It has been stated in the EIAR that drainage for the decommissioning and operational phases of the proposed development will be compatible with the Decommissioning and Rehabilitation Plans. It has also been stated in the Surface Water Management Plan (Section 1.1) that the measures implemented for the proposed construction phase will provide flow management for the operational and decommissioning phases.* *The applicant shall provide clarity in regard to how the drainage proposed for the construction phase, as set out in drainage layout Drawings 20852-NOD-01-XX-DR-C-0801 to 20852-NOD-01-XX-DR-C-0815 will transition in the decommissioning and operational phases. This has particular relevance to the proposed drainage infrastructure in areas which are within or adjacent to areas proposed to be rehabilitated into wetlands as outlined on Drawing BNM-ECO-23-27-20 in Appendix 7-2 and as to how they will interact and co-exist.*	The Commission's request for further clarity in relation to the transition of the proposed Construction Phase drainage infrastructure to the Operational and Decommissioning Phases of the proposed development has been reviewed by the Applicant, with particular regard to the interface between the proposed drainage infrastructure and the areas identified for wetland rehabilitation as detailed in the BNM Draft Cutaway Bog Decommission and Rehabilitation Plans (Appendix 7-2a – 7-2c of the Original EIAR) and as to how they will interact and co-exist. In response, a detailed overview of the transition between the Construction, Operational and Decommissioning Phase drainage arrangements is provided in Appendix E of this report. The Appendix provides: • A summary of the Existing Drainage System; • A summary of the Construction Phase drainage arrangements; • Details of the proposed transition to the Operational Phase and Decommissioning Phase drainage arrangements; • An Overview of the Draft Rehabilitation measures and how they will be reviewed and adapted as necessary in response to the evolving conditions and dynamic nature of the site; and, • Annotated Drawings explain the drainage function of the proposed development through all project stages and a projection of the proposed rehabilitation measures to be implemented on site through the operational phase of the proposed development.

	Where additional design drawings and detail are required, these shall be submitted as part of the response."	The proposed drainage provides for the progressive transition of the drainage infrastructure between the Construction, Operational and Decommissioning Phases, having regard to the changing drainage and hydrological requirements of the site. The Construction Phase drainage infrastructure will be implemented to manage surface water during construction and detailed in Appendix E, elements of this infrastructure will be retained, modified or removed as the development progresses into the Operational Phase. The permanent Operational Phase drainage infrastructure will provide for the continued management and treatment of surface water associated with the proposed development. At the Decommissioning Phase, drainage infrastructure that is no longer required to support the proposed development will be removed, modified or decommissioned as appropriate, while drainage measures required to facilitate the implementation of the Draft Rehabilitation Plans will be retained or incorporated into the final rehabilitation arrangements, as appropriate. The Appendix should be read in conjunction with the Surface Water Management Plan (Appendix 10.3 of the EIAR), the drainage drawings submitted as part of the original application, and Appendix 7-2 of the EIAR, which contains the Draft Cutaway Bog Decommissioning and Rehabilitation Plans. **Summary** In line with the detailed information provided in Appendix E, the Applicant confirms that the proposed drainage strategy provides for an appropriate transition between the Construction, Operational and Decommissioning Phases. The proposed drainage strategies have been developed having regard to the Draft Rehabilitation Plans, in particular, the areas proposed for wetland rehabilitation. The proposed drainage infrastructure and rehabilitation measures have therefore been considered together to ensure that the drainage requirements for the proposed development can be accommodated while allowing for the implementation of the proposed rehabilitation measures.



www.tobin.ie