



## APPENDIX 2-1

SCOPING RESPONSES

## Lorraine Meehan

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**From:** Ian Lumley <heritage@antaisce.org>  
**Sent:** 04 April 2019 18:30  
**To:** Lorraine Meehan <lmeehan@mkoireland.ie>  
**Subject:** Croagh Wind Farm EIA - Scoping follow-up

Lorraine,

Thanks for your reminder email.

OUR PARTICULAR CONCERNS WOULD RELATE TO

1 CUMULATIVE IMPACT WITH EXISTING AND PROPOSED WIND FARMS KIN AREA.

2 EVALUATION OF BIRD IMPACT IN OTHER EXISTING WIND FARMS IN THE AREA SINCE CONSTRUCTION

Regards

Ian Lumley

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An Taisce - The National Trust for Ireland | [www.antaisce.org](http://www.antaisce.org)  
The Tailors' Hall, Back Lane, Dublin 8, Ireland  
Company Reg. No. 12469 | Charity Ref. No. CHY4741 | Charity Regulator No. 20006358  
An Taisce is a membership-based charity  
Join at [www.antaisce.org/membership](http://www.antaisce.org/membership)

## **Lorraine Meehan**

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**From:** padraig.condon@bt.com [mailto:padraig.condon@bt.com]

**Sent:** 15 August 2018 17:30

**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>

**Subject:** RE: 180511 Carrane Hill WF, Co Leitrim

Hi Lorraine,

I can confirm the planned development will have no impact on the BT Ireland microwave radio network.

**Regards**

**Padraig Condon**  
**BT Radio Ops**

## Lorraine Meehan

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**From:** Environmental Co-ordination (Inbox) [mailto:Environmental\_Co-ordination@agriculture.gov.ie]  
**Sent:** 22 January 2019 09:42  
**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>  
**Subject:** RE: 180511 Croagh Wind Farm EIAR - Scoping

Dear Ms. Meehan,

The following are the comments from this Division in relation to the proposed development:

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling Licence from this Department before trees are felled or removed. A Felling Licence application form can be obtained from **Felling Section, Department of Agriculture, Food and the Marine, Johnstown Castle Estate, Co. Wexford**. Tel: 076-1064459, Web <https://www.agriculture.gov.ie/forests-service/tree-felling/tree-felling/>

A Felling Licence granted by the Minister for Agriculture, Food and the Marine provides authority under the Forestry Act 2014 to fell or otherwise remove a tree or trees and/or to thin a forest for silvicultural reasons. The Act prescribes the functions of the Minister and details the requirements, rights and obligations in relation to felling licences. The principal set of regulations giving further effect to the Forestry Act 2014 are the Forestry Regulations 2017 (S.I. No. 191 of 2017).

The developer should take note of the contents of **Felling and Reforestation Policy** document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; <https://www.agriculture.gov.ie/media/migration/forestry/tree-felling/FellingReforestationPolicy240517.pdf>. As this development is within a forest lands particular attention should be paid to deforestation, turbulence felling and the requirement to afforest alternative lands.

In order to ensure regulated forestry operations in Ireland accord with the principles of sustainable forest management (SFM) , as well fulfilling the requirements of other relevant environmental protection laws, the Department (acting through its Forest Service division) must undertake particular consultations and give certain matters full consideration during the assessment of individual Felling Licence applications. This includes consultation with relevant bodies, the application of various protocols and procedures (e.g. Forest Service Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement).

Consequently, when the Forest Service is considering an application to fell trees, the following applies:

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);
2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices for 2018 are published online at:  
<https://www.agriculture.gov.ie/forests-service/public-consultation/environmental-impact-assessment-environmental-impact-assessment-public-consultation-for-afforestation-forest-road-construction-and-felling-licences-2018/>

3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence and on request details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 28 days to the Forestry Appeals Committee. Felling Licence decisions for 2018 are published online at:  
<https://www.agriculture.gov.ie/forests-service/publicconsultation/environmentalimpactassessment-2018registerofdecisions/>

It is important to note that when applying to a Local Authority or An Bord Pleanála for planning permission where developments are:

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
- b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
- c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,
  - 1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project;

and

- 2. pursuant to Article 2(3) of the EIA Directive the Department of Agriculture, Food and the Marine strongly recommends that notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord Pleanála should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.

Yours sincerely,

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Breda Hennebry

**Breda Hennebry** | Clerical Officer, **An tAonad um Chomhordú Timpeallachta, An Rannóg um Athrú Aeráide agus Beartas Bithfhuinnimh**,  
Environmental Co-ordination Unit | Climate Change & Bioenergy Policy Division | [environmentalco-ordination@agriculture.gov.ie](mailto:environmentalco-ordination@agriculture.gov.ie)  
**An Roinn Talmhaíochta, Bia agus Mara**  
Department of Agriculture, Food and the Marine

**Lárionad Gnó Grattan, Bóthar Bhaile Átha Cliath, Port Laoise, Co Laoise, R32 K857**

Grattan Business Centre, Dublin Road, Portlaoise, Co. Laoise, R32 K857

T +353 (0)57 868 9914

[www.agriculture.gov.ie](http://www.agriculture.gov.ie)

Disclaimer:

Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolais san ríomhphost seo, agus in aon ceanglín leis, faoi phribhléid agus faoi rún agus le h-agmaigh an seolaí amháin. D'fhéadfadh ábhar an seoladh seo bheith faoi phribhléid profisiúnta nó dlíthiúil. Mura tusa an seolaí a bhí beartaithe leis an ríomhphost seo a fháil, tá cosc air, nó aon chuid de, a úsáid, a chóipeál, nó a scaoileadh. Má tháinig sé chugat de bharr dearmad, téigh i dteagmháil leis an seoltóir agus scríos an t-ábhar ó do ríomhaire le do thoil.



Your Ref: 180511  
Our Ref: **G Pre00004/2019**  
(Please quote in all related correspondence)

30 January 2019

Lorraine Meehan,  
Environmental Scientist  
McCarthy Keville O'Sullivan Ltd.,  
Planning & Environmental Consultants,  
Block 1, G.F.S.C.,  
Moneenageisha Road,  
Galway  
H91 N8KK

Via email: [jowens@mccarthykos.ie](mailto:jowens@mccarthykos.ie) cc: [lmeehan@mccarthykos.ie](mailto:lmeehan@mccarthykos.ie)

**Re: Environmental Impact Assessment (EIA) Scoping Consultation for Proposed Croagh Wind Farm which is located approximately 3.8 kilometres west of Drumkeeran, Co. Leitrim.**

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading.

### **Nature Conservation**

Please find below general scoping comments for Environmental Impact Assessment Report (EIAR), Appropriate Assessment (AA) screening and licensing requirements, followed by specific comments regarding the site in question.

These observations are intended to assist you in meeting the obligations that may arise in relation to European sites, other nature conservation sites, and biodiversity and environmental protection in general in the context of the current application. The observations are not exhaustive, and are made without prejudice to any recommendation that may be made by this Department in the future. Data collected and surveys carried out in connection with this proposed development may raise other issues that have not been considered here.



The National Parks and Wildlife Service (NPWS) website has recently been updated and should be consulted with regard to the impact of planning and development on nature conservation. Further details are accessible on the website at <https://www.npws.ie/development%20consultations>.

## **EIAR**

### Ecological survey

With regard to scoping for an EIAR for a proposed development, in order to assess impacts on biodiversity, fauna, flora and habitats an ecological survey should be carried out of the proposed development site including the route of any access roads, pipelines or cables etc. to survey the habitats and species present. Any improvement or reinforcement works required for access and transport anywhere along any proposed haul route(s) should be included in the EIAR and subjected to ecological impact assessment with the inclusion of mitigation measures, as appropriate. Where bridges require strengthening this may involve grouting of crevices which may function as bat roosts. Where ex-situ impacts are possible survey work may be required outside of the development sites. Such surveys should be carried out by suitably qualified persons at an appropriate time of the year depending on the species being surveyed for. The EIAR should include the results of the surveys and detail the survey methodology and timing of such surveys. It is expected by this Department that best practice will be adhered to with regard to survey methodology and if necessary non-Irish methodology adapted for the Irish situation. The EIAR should cover the whole project, including construction, operation and, if applicable, restoration or decommissioning phases. Alternatives examined should also be included in the EIAR. Inland Fisheries Ireland (IFI) should be consulted with regard to fish species if applicable. For information on Geological and Geomorphological sites the Geological Survey of Ireland should be consulted.

Specific reference should be made to the National Biodiversity Plan and any relevant County Biodiversity Plan. Any losses of biodiversity habitat associated with this proposed development (including access roads and cabling etc.) such as woodland, scrub, hedgerows and other habitats should be mitigated for.

In order to assess impacts it may be necessary to obtain hydrological and/or geological data. Any impact on water table levels or groundwater flows may impact on wetland sites some distance away. The EIAR should assess cumulative impacts with other plans or projects if applicable. Where negative impacts are identified suitable mitigation measures should be detailed as appropriate.

### Hedgerows and related species

Hedgerows should be maintained where possible as they form wildlife corridors and provide areas for birds to nest in; hedgerow trees may provide roosting places for bats. Badger setts may be present. Hedgerows also provide a habitat for woodland flora. The EIAR should provide an estimate of the length of any hedgerow that will be lost. Where it is





proposed that trees or hedgerows will be removed there should be suitable planting of native species in mitigation incorporated into the EIAR. Where possible, hedgerows and trees should not be removed during the nesting season (i.e. March 1st to August 31st). Bird's nests can only be intentionally destroyed under licence issued under the Wildlife Acts of 1976 to 2012.

#### Watercourses and wetlands

Wetlands are important areas for biodiversity and ground and surface water quality and should be protected during construction and operation of the proposed development. Any watercourse or wetland impacted on should be surveyed for the presence of protected species and species listed on Annexes II and IV of the Habitats Directive. These species could include otters (*Lutra lutra*), which are protected under the Wildlife Acts and listed on Annexes II and IV of the Habitats Directive, salmon (*Salmo salar*) and Lamprey species listed on Annex II of the Habitats Directive, Freshwater Pearl Mussels (*Margaritifera* species) and White-clawed Crayfish (*Austropotamobius pallipes*) which are protected under the Wildlife Acts and listed on Annex II of the Habitats Directive, Frogs (*Rana temporaria*) and Newts (*Triturus vulgaris*) protected under the Wildlife Acts and Kingfishers (*Alcedo atthis*) protected under the Wildlife Acts and listed on Annex I of the Birds Directive (Council Directive 79/409 EEC).

One of the main threats identified in the threat response plan for otter is habitat destruction (see [https://www.npws.ie/sites/default/files/publications/pdf/2009\\_Otter\\_TRP.pdf](https://www.npws.ie/sites/default/files/publications/pdf/2009_Otter_TRP.pdf)). A 10m riparian buffer on both banks of a waterway is considered to comprise part of the otter habitat. Therefore any proposed development should be located at least 10m away from a waterway.

#### Flood plains

Flood plains, if present, should be identified in the EIAR and left undeveloped to allow for the protection of these valuable habitats and provide areas for flood water retention (green infrastructure). If applicable the EIAR should take account of the guidelines for Planning Authorities entitled "The Planning System and Flood Risk Management" and published by the Department of the Environment, Heritage and Local Government In November 2009.

#### Bats

Bat roosts may be present in trees, buildings and bridges. Bat roosts can only be destroyed under licence under the Wildlife Acts and derogation under the Birds and Natural Habitats Regulations and such a licence would only be given if suitable mitigation measures were implemented. Any proposed migratory bat friendly lighting should be proven to be effective.

#### Alien invasive species

The EIAR should also address the issue of invasive alien plant and animal species such as Japanese Knotweed or piri piri burr, and detail the methods required to ensure they are not accidentally introduced or spread during survey and/or construction. Information on alien



Invasive species In Ireland can be found at <http://invasives.biodiversityireland.ie/> and at <https://invasivespeciesireland.com/>.

#### Bird surveys

Survey methodologies should follow best practice and if necessary be modified to reflect the Irish situation. Two full years of bird surveys is normally considered to be necessary. When survey results are being presented In an EIAR it is important that best practice is followed and that the full survey methodology, including dates and times are detailed. Furthermore, it is expected that bird survey data should be presented in context and records should be supported by basic environmental data such as hourly estimates of visibility, glare arcs, cloud cover and precipitation during Vantage Point (VP) survey and walk over survey periods. Results for species need to be referenced back to the overall populations and their dynamics as, in some cases even a small risk to a population of a species could be considered significant. It is important that bird migration routes are considered as well as routes of birds travelling on a daily basis between roosting and feeding areas.

#### Impact assessment

The impact of the proposed development on the flora/fauna and habitats present should be assessed with particular regard to:

Natura 2000 sites, i.e. Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) and Special Protection Areas (SPA) designated under the EC Birds Directive (Directive 2009/147 EC), other designated sites, or sites proposed for designation, such as Natural Heritage Areas (NHA) and proposed Natural Heritage Areas (pNHA), Nature Reserves and Refuges for Fauna or Flora designated under the Wildlife Acts 1976 to 2012, species protected under the Wildlife Acts including protected flora, 'Protected species and natural habitats', as defined in the Environmental Liability Directive (2004/35/EC) and European Communities (Environmental Liability) Regulations, 2008 including Birds Directive - Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur) and Habitats Directive - Annex I habitats, Annex II species and their habitats, and Annex IV species and their breeding sites and resting places (wherever they occur), important bird areas such as those identified by Birdlife International, features of the landscape which are of major importance for wild flora and fauna, such as those with a "stepping stone" and ecological corridors function, as referenced in Article 10 of the Habitats Directive, other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plans and County Development Plans), Red data book species, and biodiversity in general.

Complete project details including Construction Management Plans (CMPs) need to be provided in order to allow an adequate EIAR and appropriate assessment to be undertaken. Applicants need to be able to demonstrate that CMPs and other such plans are adequate and effective mitigation supported by scientific information and analysis and



that they are feasible within the physical constraints of the site. The positions, locations and sizes of construction infrastructure and mitigation such as settlement ponds, disposal sites and construction compounds may significantly affect European and other designated sites, habitats and species in their own right and could have an effect for example on drainage, water quality, habitat loss, and disturbance. If these are undetermined at time of the assessment all potential effects of the development on the site are not being considered.

#### Construction Management Plans

Construction Management Plans should contain sufficient detail to avoid any post construction doubt with regard to the implementation of mitigation measures, timings and roles and responsibilities for same. There can be no doubts or lacunae regarding what is required for mitigation, pre-commencement surveys and/or licencing requirements.

Construction work should not be allowed to impact on water quality and measures should be detailed in the EIAR to prevent sediment and/or fuel runoff from getting into watercourses which could adversely impact on aquatic species. See the above "Flood Plains" section for details with regard to flooding risk.

Inland Fisheries Ireland (IFI) should be consulted with regard to impacts on fish species and the applicant may find it useful to consult their publication entitled "Planning for watercourses in the urban environment" which can be downloaded from their website.

If applicants are not in a position to state the exact location and details of cable routes at the time of application, then they need to consider the range of options that may be used within their assessment. Should the exact height and rotor diameter of the turbines not be known at EIAR stage then the assessment of impacts must be applicable to a variety of turbine heights and rotor diameters which could be used. This should be made clear in the EIAR.

It is important to note that unless post decision consultation with this Department is specifically stated as a condition of planning, this Department has no post consent role. However, regional staff are available for liaison regarding any associated licencing requirements and/or new information arising for specific species of concern.

#### Cumulative and ex situ impacts

A rule of thumb often used is to include all European sites within a distance of 15km. It should be noted however that this will not always be appropriate. In some instances where there are hydrological connections a whole river catchment or a groundwater aquifer may need to be included. Similarly where bird flight paths are involved the impact may be on an SPA more than 15 km away.

Other relevant Local Authorities should be consulted to determine if there are any projects or plans which, in combination with this proposed development, could impact on any European sites.



### Appropriate Assessment

In order to carry out the Appropriate Assessment screening, and/or prepare a Natura Impact Statement (NIS), information about the relevant European sites including their conservation objectives will need to be collected. Details of designated sites and species and conservation objectives can be found on <http://www.npws.ie/>. Site-specific, as opposed to generic, conservation objectives are now available for many sites. Each conservation objective for a qualifying interest (QI) is defined by a list of attributes and targets and is often supported by further documentation. Where these are not available for a site, an examination of the attributes that are used to define site-specific conservation objectives for the same QIs in other sites can be usefully used to ensure the full ecological implications of a proposal for a site's conservation objective and its integrity are analysed and assessed. This Department advises, as per the notes and guidelines in the site-specific conservation objectives that any reports quoting conservation objectives should give the version number and date, so that it can be ensured and established that the most up-to-date versions are used in the preparation of Natura Impact Statements and in undertaking appropriate assessments.

The Departmental guidance document on Appropriate Assessment is available on the NPWS website at <https://www.npws.ie/development-consultations> and in the EU Commission guidance entitled "Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC' which can be downloaded from; [http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura\\_2000\\_assess\\_en.pdf](http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf).

CJEU and Irish case law has clarified some issues and should also be consulted.

### Post construction monitoring

This Department recognises the importance of pre and post construction monitoring, such as recommended in Drewitt et al. (2006), and Bat Conservation Ireland (2012). The applicant should not use any proposed post construction monitoring as mitigation to supplement inadequate information in the assessment. Please refer to Circular Letter PD 2/07 and NPWS 1/07 on this issue. This can be downloaded from the Department's website <https://www.npws.ie/sites/default/files/general/circular-pd-02-07.pdf>.

The EIAR process should identify any pre and post construction monitoring which should be carried out. The post construction monitoring should include bird and bat strikes/fatalities including the impact on any such results of the removal of carcasses by scavengers. Monitoring results should be made available to the competent Authority and copied to this Department. A plan of action needs to be agreed at planning stage with the Planning Authority if the results in future show a significant mortality of birds and/or bat species. It is important to note again that unless post decision consultation with this Department is specifically stated as a condition of planning, this Department has no post consent role. However, regional staff are available for liaison regarding any associated licencing requirements and/or new information arising for specific species of concern.



Please note that any significant change to mitigation may require amendment and where a licence has expired; there will be a need for new licence applications for protected species.

#### Licences

Where there are impacts on protected species and their habitats, resting or breeding places, licences may be required under the Wildlife Acts or derogations under the Habitats Regulations. In particular bats and otters are strictly protected under annex IV of the Habitats Directive. A copy of Circular Letter NPWS 2/07 entitled “Guidance on Compliance with Regulation 23 of the Habitats Regulations 1997 – strict protection of certain species/applications for derogation licences” can be found on the Departmental website at <https://www.npws.ie/sites/default/files/general/circular-npws-02-07.pdf>.

It should be noted however that the Regulations of 1997 have since been revoked and that Part 6 of the European Communities (Birds and Natural Habitats) Regulations 2011-2015 is now the relevant part dealing with the protection of flora and fauna. In particular reference to Regulation 23 in the circular letter should be taken to mean Regulation 51 in the current Regulations.

In addition the planning authority will be required to take account of species protected under sections 21,22 and 23 of the Wildlife Acts if there are any impacts on other protected species or their resting or breeding places, such as on protected plants, badger setts or birds’ nests. They will also need to be cognisant of article 5 (d) of the Birds Directive. For that reason vegetation, including hedges and trees, should not be removed during the nesting season (i.e. March 1<sup>st</sup> to August 31<sup>st</sup>).

In order to apply for any such licences or derogations as mentioned above the results of a survey should be submitted to the National Parks and Wildlife Service section of this Department. Such surveys are to be carried out by appropriately qualified person/s at an appropriate time of the year. Details of survey methodology should also be provided. Should this survey work take place well before construction commences, this Department recommends that an additional ecological survey of the development site should take place immediately prior to construction to ensure no significant change in the findings of the baseline ecological survey has occurred. If there has been any significant change mitigation may require amendment and where a licence has expired, there will be a need for new licence applications for protected species.

#### Baseline data

Other sources of habitat and species information beyond those already identified and the standard NPWS data request include (but are not be limited to) the National Biodiversity Data Centre ([www.biodiversityireland.ie](http://www.biodiversityireland.ie)), Inland Fisheries Ireland ([www.fisheriesireland.ie](http://www.fisheriesireland.ie)). BirdWatch Ireland ([www.birdwatchireland.ie](http://www.birdwatchireland.ie)), Irish Raptor Study Group, Golden Eagle Trust, and Bat Conservation Ireland ([www.batconservationireland.org](http://www.batconservationireland.org)). Data may also exist at a County level within the Planning Authority.



General guidance and useful references;

1. EU Guidance on Wind Energy Developments and Natura 2000
2. The Departmental Wind Energy Planning Guidelines
3. Windfarms on Peatland (2008-2010) Mires and Peat volume 4
4. Best Practice guidance for Habitat Survey and Mapping by George F Smith, Paul O'Donoghue, Katie O'Hora and Eamon Delaney, 2011. The Heritage Council
5. Pearce-Higgins, James W., Stephen, Leigh, Langston, Rowena H. W., Bainbridge, Ian P. and Bullman. Rhys (2009). "The distribution of breeding birds around upland wind farms". Journal of Applied Ecology, 46, 1323-1331
6. Johnson, Gregory D. and Arnett Edward 8. "A Bibliography of Bat Fatality Activity and Interactions with Wind Turbines" (June 2004 updated February 2010) Bat Conservation International
7. Pearce-Higgins, James W., Stephen, Leigh, Douse, Andy, and Langston, Rowena H. W. (2012). "Greater impacts of wind farms on bird populations during construction than subsequent operation: results of a multisite and multi-species analysis". Journal of Applied Ecology. 49.386-394
8. Rodrigues, Let ai, (2014). "Guidelines for consideration of bats in wind farm projects". Eurobats Publication Series NO.6 UNEP and Eurobats
9. The Departmental guidance document on Appropriate Assessment which is available on the NPWS website at <https://www.npws.ie/protected-sites/guidance-appropriate-assessment-planning-authorities>
10. The EU Commission guidance entitled "Assessment of plans and projects significantly affecting Natura 2000 sites, Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" which can be downloaded from [http://ec.europa.eu/environment/nature/natura2000/management/guidance\\_en.htm](http://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm)
11. Bat Conservation Ireland (2012) Wind Turbine/Wind Farm Development Bat Survey Guidelines. Version 2.8, December 2012
12. Drewitt, Allan Land Longston Rowena H. W. (2006) "Assessing the impacts of wind farms on birds". Ibis 148. 29-42

Further to the above general comments please find below specific observations relating to the site in question.

- This Department is not in a position to provide further data regarding the specific species listed at this time.
- More generally, in addition to the species already identified, in particular Hen Harrier; the application should give detailed consideration to but not be limited to Merlin and Golden Plover as species of concern.
- Please also note that the EIAR bird survey recommendations above suggest that bird survey data should be presented in context and records should be supported by basic environmental data such as hourly estimates of visibility, glare arcs, cloud



cover and precipitation during Vantage Point (VP) survey and walk over survey periods.

- The EIAR should also give specific consideration to the mobilisation of silt and changes to the stability of peat.
- Changes to the underlying Ph. balance arising from the importation of fill materials should be addressed comprehensively.
- This Department notes that the invasive species, piri piri burr (*Acaena novae-zelandiae*) has been recorded near this site and habitat surveys and invasive species protocols should be cognisant of this.

The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority, in her role as statutory consultee under the Planning and Development Act, 2000, as amended.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at [manager.dau@chg.gov.ie](mailto:manager.dau@chg.gov.ie) (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager  
Development Applications Unit (DAU)  
Department of Culture, Heritage and the Gaeltacht  
Newtown Road  
Wexford  
Y35 AP90

Is mise, le meas

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Sinéad O' Brien  
Development Applications Unit

## Lorraine Meehan

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**From:** Property Management [mailto:PropertyManagement@defence.ie]

**Sent:** 06 February 2019 09:19

**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>

**Cc:** Olive.Mulhall <Olive.Mulhall@defence.ie>

**Subject:** 180511 Croagh Wind Farm EIAR - Scoping

Hi,

I refer to application reference no: 180511. Re: Scoping document

Based on the information supplied, the Department of Defence have the following observations:

- a. In all locations where windfarms are permitted it should be a condition that they meet the following lighting requirements
  1. Single turbines or turbines delineating corners of a windfarm should be illuminated by high intensity obstacle strobe lights (Red).
  2. Obstruction lighting elsewhere in a windfarm will be of a pattern that will allow the hazard be identified and avoided by aircraft in flight.
  3. Obstruction lights used should be incandescent or of a type visible to Night Vision Equipment. Obstruction lighting fitted to obstacles must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum specifically at or near 850nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of lightObstruction lights used should be incandescent or of a type visible to Night Vision Equipment.

Kind Regards,

Joe Behan  
Property Management  
Dept of Defence  
Station Road  
Newbridge  
Co. Kildare

Fógra faoi Rúndacht: Tá an ríomhphost seo agus aon iatán a ghabhann leis rúnda. Is leis an duine / nó daoine sin amháin a bhfuil siad seolta chucu a bhaineann siad agus ní ceart iad a léamh ná a scaoileadh chuig aon tríú páirtí gan cead roimh ré ón Roinn Cosanta. Chun amharc ar an Chairt do Chustaiméirí, cliceáil ar [www.defence.ie/WebSite.nsf/Publication+ID/1D378F944CAEE1D880256EBE00401CEB](http://www.defence.ie/WebSite.nsf/Publication+ID/1D378F944CAEE1D880256EBE00401CEB)

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## Lorraine Meehan

---

**Subject:** FW: 180511 Carrane Hill WF, Co Leitrim

**From:** John.Bagnall@eir.ie [mailto:John.Bagnall@eir.ie]

**Sent:** 11 September 2018 13:00

**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>

**Cc:** MobileNetworksTXN@eir.ie

**Subject:** RE: 180511 Carrane Hill WF, Co Leitrim

Lorraine,

We have a one transmission link within the proposed area, that would be at risk, the end points of the transmission link are below, if you could keep a buffer of 100meters diameter away from this transmission path when placing you turbines and send on for further analysis. Turbine 10 & 11 seem to be within the buffer zone and could impact the transmission path if you could place them outside the buffer zone.

Link 1 – End point 1 - 54° 8'54.33"N 008°16'27.64"W, End point 2 – 54°15'32.71"N 008°11'12.79"W

Please keep sending new development analysis request to [MobileNetworksTXN@eir.ie](mailto:MobileNetworksTXN@eir.ie) for Eir Mobile (formerly Meteor) network analysis.



Kind Regards,

John Bagnall   
Transmission Design & Engineering

## Lorraine Meehan

---

**From:** Paul McDonagh [mailto:paul.mcdonagh@esb.ie]

**Sent:** 20 September 2018 12:00

**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>

**Subject:** RE: 180511 Carrane Hill WF, Co Leitrim

Hi Lorraine

I have analysed the propose area based on the co-ordinates provided and it indicates that there should be no impact on our Telecoms Network.

Regards

Paul

## Lorraine Meehan

---

**Subject:** FW: 180511 Croagh Wind Farm EIAR - Scoping

**From:** planning applications [mailto:planning.applications@failteireland.ie]

**Sent:** 11 January 2019 16:40

**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>

**Subject:** RE: 180511 Croagh Wind Farm EIAR - Scoping

Hello Lorraine,

Thank you for your recent email regarding the **proposed Croagh Wind Farm, Co Leitrim**. Sorry for the delay in replying to your e-mail. Please see attached a copy of Fáilte Ireland's Guidelines for the treatment of tourism in an EIS, which we recommend should be taken into account in preparing the EIAR.

For future planning notifications, queries, or documents please send by email to [planning.applications@failteireland.ie](mailto:planning.applications@failteireland.ie)

This will ensure the information/notifications will get to the Environmental & Planning Unit and reviewed in a timely manner.

Regards & thanks,

Yvonne

## Yvonne Jackson

Product Development-Environment & Planning Support | Fáilte Ireland

Áras Fáilte, 88/95 Amiens Street, Dublin 1. D01WR86

T +353 (0)1 884 7224 | [www.failteireland.ie](http://www.failteireland.ie)



**Fáilte Ireland**  
National Tourism Development Authority



Regards & thanks,

Yvonne

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# Guidelines on the treatment of tourism in an Environmental Impact Statement

## 1. Introduction

Tourism is a significant component of the Irish Economy – estimated to employ approximately 205,000 people – and contributing €6.6 billion in spending to the economy in 2014. The environment is one of the main resources upon which this activity depends – so it is important that the EIS evaluates whether and how the interacting impacts of a project are likely to affect tourism resources.

The purpose of this short note is to provide guidance on how these impacts can be assessed through the existing EIA process. Undertaking an EIA is governed by the EIA Advice Notes published by the EPA. These Advice Notes contain detailed guidance on how to describe and evaluate the effects arising from a range of projects, including tourism projects.

These guidelines were written with the assistance of Conor Skehan, Head of Department of Environment and Planning, Dublin Institute of Technology.

## 2. Tourism and the Environment

There are two interactions between tourism and the environment.

1. Impacts caused by Tourism Projects
2. Impacts affecting Tourism (e.g. the quality of a destination or a tourism activity)

### Impacts caused by Tourism Projects

Tourism projects can give rise to effects on the environment. These are specifically dealt with under a number of Project Types in the Advice Notes, specifically:

#### **12 TOURISM AND LEISURE**

- a. Ski-runs, ski-lifts and cable-cars where the length would exceed 500 metres and associated developments. Project Type 20
- b. Sea water marinas where the number of berths would exceed 300 and fresh water marinas where the number of berths would exceed 100. Project Type 10

c. Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms. Project Type 28

d. Permanent camp sites and caravan sites where the number of pitches would be greater than 100. Project Type 28

e. Theme parks occupying an area greater than 5 hectares. Project Type 29

**Figure 1 The Advice Notes contain detailed descriptions on how to describe and evaluate the effects arising from a range of tourism projects.**

### **Impacts affecting Tourism**

Environmental effects of other projects on tourism are not specifically addressed in the Advice Notes. Taking account of the significance of tourism to the Irish economy a specialist topic of 'Tourism' has been prepared to facilitate a systematic evaluation of effects on this sector within the format laid down for other parts of the Environmental Impact Statement.

It is not intended that the assessment of effects on tourism should become a separate section of the Impact Statement, instead it is intended to become a specialist sub-section of the topic 'Human Beings' which is currently described in Section 2 of the Advice Notes

## **3. Tourism in the Existing Environment**

### **Introduction**

Visitor attitude surveys reveal that the following factors – in order of priority – are the reasons that tourists visit and enjoy Ireland:

- Beautiful scenery
- Friendly & hospitable people
- Safe & Secure
- Easy, relaxed pace of life
- Unspoilt environment
- Nature, wildlife, flora
- Interesting history & culture
- Plenty of things to see and do
- Good range of natural attractions

It is noteworthy that over half of the factors listed are environmental and that all others are related to the way of life of the people. The following describes how these factors are considered within an EIS, set out under EIA topic headings, and how they interact with tourism.

### *Beautiful scenery*

This is covered in the '*Landscape*' Section. Particular attention needs to be paid to effects on views from existing purpose-built tourism facilities, especially hotels, as well as views from touring routes and walking trails. It is important to note that there appears to be evidence that the visitor's expectations of 'beautiful' scenery does not exclude an admiration of new modern developments – such as windfarms – which appear to be seen as indicative of an modern, informed and responsible attitude to the environment.

### *Friendly & hospitable people*

This is not an environmental factor though it is indirectly covered under the '*Human Beings*' section of the EIS. The principal factor is the ratio of visitors to residents. This is of less significance in areas with long-established patterns of tourism.

### *Safe & Secure*

This is not an environmental issue – though some of the factors that are sometimes covered under the heading of '*Human Beings*' – such as social inclusion or poverty – can point to likely effects and interactions.

### *Easy, relaxed pace of life*

This is not an environmental issue though it is partially covered under '*Human Beings*' – see comments above.

### *Unspoilt environment*

This is covered under the sections dealing with '*Landscape*', '*Flora*' and '*Fauna*' and to a lesser extent under emissions to '*Water*' and '*Air*'. In some instances traffic congestion, especially in rural areas, can be an issue, this is usually covered within '*Material Assets*'.

### *Nature, wildlife, flora*

This is principally covered under the headings of '*Flora*' and '*Fauna*' and to a lesser extent by '*Landscape*', '*Water*' and '*Air*'. The principal issues being to avoid any effects that might reduce the health or extent of the habitats. This can occur either directly, by impinging on the site, or indirectly, through emission, that can affect the natural resources, like clean water, which the habitat depends on. It also considers effect on physical access to and visibility of these sites. Occasionally there are concerns about the disturbance or wear and tear of visitor numbers to such sites.

### *Interesting history & culture*

This is principally covered under '*Cultural Heritage*' and, to a lesser extent, under '*Human Beings*'. The principal issues being to avoid damage to sites and structures of cultural, historical, archaeological or architectural significance – and to their contexts or settings. It also considers effect on physical access to and visibility of these sites. Occasionally there are concerns about the wear and tear of visitor numbers to such sites.

*Plenty of things to see and do.*

This is not an environmental issue though it is partially covered by the 'Human Beings' section, where the tourism resources of an area are described and assessed.

*Good range of natural attractions*

This is covered by the 'Landscape', 'Flora', 'Fauna', and 'Cultural Heritage' sections of the EIS.

## **4. Project factors affecting Tourism**

### **Introduction**

Tourism can be affected both by the structures or emissions of new developments as well as by interactions between new activities and tourism activities – for example the effects of high volumes of heavy goods vehicles passing through hitherto quiet, scenic, rural areas. Tourism can be affected by a number of the characteristics of the new project such as:

- New Developments
  - Social Considerations
  - Land-uses and Activities
- 
- *New Developments* - will the development stimulate or suppress demand for additional tourism development in the area? If so, what type, how much and where? Marinas, golf courses, other major sporting facilities as well as theme parks and larger conference facilities can all stimulate the emergence of new accommodation, catering and leisure facilities often within an extensive area around a new primary visitor facility. Extensive urbanisation and large scale infrastructure as well as certain processing and extractive industries all have the potential to suppress demand for additional tourism – but usually only in the immediate locality of the new development. It should be noted however, that some types of new or improved large scale infrastructure – such as roads – can improve the visitor experience – by increasing safety and comfort or can convey a sense of environmental responsibility – such as wind turbines.
  - *Social Consideration* - will the development change patterns and types of activity and land use? Will it affect the demographics, economy or social dynamics of the locality?
  - *Land-use* - will there be severance, loss of rights of way or amenities, conflicts, or other changes likely to ultimately alter the character and use of the tourism resources in the surrounding area?

### **Existing Tourism**

In the area likely to be affected by the proposed development, the following attributes of tourism, or the resources that sustain tourism, should be described under the following headings.

Note that the detailed description and analysis will usually be covered in the section dealing with the relevant environmental topic – such as '*Landscape*'. Only the relevant finding as to the likely significance to, or effect on, tourism needs to be summarised in this section.

### **Context**

Indicate the location of sensitive neighbouring tourism resources that are likely to be directly affected, and other premises which although located elsewhere, may be the subject of secondary impacts such as alteration of traffic flows or increased urban development. The following should be noted in particular:

- Hotels, conference centres, holiday accommodation – including holiday villages, holiday homes, and caravan parks.
- Visitor centres, Interpretive centres and theme parks
- Golf courses, adventure sport centres and other visitor sporting facilities
- Marinas and boating facilities
- Angling facilities
- Equestrian facilities
- Tourism-related specialist retailers and visitor facilities
- Historic and Cultural Sites
- Pedestrian, cycling, equestrian, vehicular and coach touring routes

Indicate the numbers of premises and visitors likely to be directly affected directly and indirectly.

Identify and quantify, where possible, their potential receptors of impacts, noting in particular transient populations, such as drivers, walkers, seasonal and other non-resident groups.

Describe any significant trends evident in the overall growth or decline of these numbers, or of any changes in the proportion of one type of activity relative to any other.

Indicate any commercial tourism activity which likely to be directly affected, with resultant environmental impacts.

### **Character**

Indicate the occupations, activities or interests of principal types of tourism in the area. – Where relevant, describe the specific environmental resources or attributes in the existing environment which each group uses or values; where relevant, indicate the time, duration or seasonality of any of those activities. For example describe the number of guides, boats and anglers who use a salmon fishery and the duration of the salmon season as well as the quantity and type of local accommodation that is believed to be used by the anglers.

### **Significance**

Indicate the significance of the principal tourism assets or activities likely to be affected. Refer to any existing formal or published designation or recognition of such significance. Where possible provide an estimate of the contribution of such



tourism activities to the local economy. For instance refer to the number of annual visitors to a tourism attraction or to the grading of a hotel.

### **Sensitivity**

Describe any significant concerns, fears or opposition to the development known to exist among tourism interests. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened. For instance describe the extent of a potential visual intrusion onto a site of historic significance which is the main local tourist attraction.

## **5. Impacts on Tourism**

### **"Do Nothing" Impact;**

Describe how trends evident in the existing environment will continue and how these trends will affect tourism.

### **Predicted impact;**

- Describe the location, type, significance, magnitude/extent of the tourism activities or assets that are likely to be affected.
  
- Describe how the new development will affect the balance between long-established and new dwellers in an area and its affect on the cultural or linguistic distinctiveness of an area. For example describe the effect of a new multi-national population required for an international call-centre located in a Gaeltacht area.
  
- Describe how changes in patterns of employment, land use and economic activity arising from the proposed development will affect tourism, for example, illustrating how a new industrial development will diversify local employment opportunities thereby reducing the area's unsustainable over-reliance on seasonal tourism.
  
- Describe the consequences of change, referring to indirect, secondary and cumulative impacts on tourism; Examples can include describing how the new development may lead to a reduced assimilative capacity for traffic or water during the peak of the tourism season or how new urbanism combined with existing patterns of tourism may lead to unsustainable levels of pedestrian traffic through a sensitive habitat.
  
- Describe the potential for interaction between changes induced in tourism and other uses that may affect the environment – for instance increasing new tourism-related housing affecting water resources or structures
  
- Describe the worst case for tourism if all mitigation measures fail.

## 6. Mitigating adverse impact on Tourism

Describe the mitigation measures proposed to:

- *avoid* sensitive tourism resources – such as views, access, and amenity areas including habitats as well as historical or cultural sites and structures.
- *reduce* the exposure of sensitive resources to excessive environmental burdens arising from the development's emissions or volumes of traffic [pedestrian and vehicular], and/or losses of amenity arising from visually conspicuous elements of the development – for example by prioritizing visual screening of views from a hotel towards a quarry.
- *reduce* the adverse effects to tourism land uses and patterns of activities – especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance – for example by separating traffic routes for industrial and tourism traffic.
- *remedy* any unavoidable significant residual adverse effects on tourism resources or activities, for example by providing alternative access to tourism amenities – such as waterways or monuments.



Seirbhís Sláinte Comhshaoil - Sligeach / Liatroma / Iarthar an Chabháin  
Ard Eoghain, Sligeach F91T25N  
Tel: 071 91 45132

Environmental Health Service – Sligo / Leitrim / West Cavan,  
Ardaghowen, Sligo F91T25N  
Sligo.PEHO@HSE.ie

## Environmental Health Service Consultation Report

*(as a Statutory Consultee under the Planning and Development Acts 2000 (as amended) & Regulations made thereunder)*

**Report to:** McCarthy Keville O Sullivan Ltd,  
Block 1,  
GFSC,  
Moneenageisha Road,  
Galway.

**Type of consultation:** Scoping

**Planning Authority:** Leitrim Co Co

**Reference Number:** Not Assigned. Application has not been made. Proceedings are at scoping stage as of yet.

**EHIS Reference number:** 0875

**Applicant:** Coillte

**Proposed Development: Wind Farm at Carrane Hill, Garvagh, Killavoggy, Co. Leitrim.**

Dear Sir/Madam,

The “Environmental Impact Assessment Scoping Document – Proposed Croagh Wind Farm, Co. Leitrim” (*File name - 181212 ENCH Scoping Document F – 180511*) has been read and the proposals, research work, studies and methodologies stated therein to be included in the final EIAR to accompany any future planning development are taken as given.

The possible impacts likely to be caused and the proposed mitigation measures under the following headings -

- Population and Health including shadow flicker
- Biodiversity: Flora and Fauna
- Biodiversity: Birds
- Land, Soils and Geology
- Hydrology and hydrogeology



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Ardaghown, Sligo F91T25N  
Sligo.PEHO@HSE.ie

- Air and Climate
- Noise and Vibration
- Landscape and Visual;
- Archeological, Architectural and Cultural Heritage
- Material Assets
- Interaction of the Foregoing

will be awaited in the final submitted EIAR.

We will have particular interest in environmental impact studies, methodologies and proposed mitigation measures in the areas of ground and surface water quality and protection, at construction, operational and decommissioning phases. We would recommend that all surface waters and private wells affected be identified and that qualitative analysis of both surface and ground waters be as current as possible.

Likewise we will look with interest on studies, methodologies and proposed mitigation in the area of air pollution, particularly during construction and decommissioning.

We will also welcome details of surveys outlining impacts methodologies and mitigation measures in the area of noise and vibration, at construction operation and decommissioning stages. On the subject of noise surveys we would welcome actual “on the ground” noise readings at Noise Sensitive Locations when assessing background noise data, rather than a total reliance on modelled predictions. We would particularly welcome commentary on the cumulative noise environment at this general location due to the existence of wind farms already in the area. We would welcome undertakings for noise surveys in the future were the development to proceed.

We will welcome detailed studies and proposed mitigation measures in relation to peat stability particularly at construction but also at other later stages of the life of the site.

For the construction stage we would welcome an outline of staff numbers to be involved on site including details of staff facilities for resting, dining, water consumption and sanitary facilities and methods of disposal of staff generated waste.

Yours truly

Finán Ó Gallchoibhair

**Principal Environmental Health Officer**

## Lorraine Meehan

---

**From:** Ronnie O'Neill [mailto:Ronnie.ONeill@imaginegroup.ie]

**Sent:** 15 August 2018 12:02

**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>

**Cc:** Miriam Casey <Miriam.Casey@imaginegroup.ie>; Karien Heron <Karien.Heron@imaginegroup.ie>

**Subject:** Re: FW: 180511 Carrane Hill WF, Co Leitrim

Hi Lorraine ,

Imagine have no network in this area .

Rgds,  
Ronnie .



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

7<sup>th</sup> February 2019

**Re. Project number 180511 Scoping Request for Croagh Windfarm.**

Dear Sir/Madam,

Inland Fisheries Ireland has considered the preliminary information provided in relation to this scoping request and has the following comments to make. The information available to IFI about the proposed development at this stage is very limited and all comments below are made in this context.

Inland Fisheries Ireland, IFI (formerly the Central and Regional Fisheries Boards) is a statutory agency with responsibility under the provisions of the Fisheries Acts for the protection, management and conservation of Ireland's inland fisheries resource.

The area proposed for the development of this windfarm falls within two River Basin Districts and would therefore be within the jurisdiction of IFI Shannon RBD (Drumsna) and IFI Western RBD (Ballina) this is a joint submission from both RBD's, however all correspondence should continue to be sent to both the undersigned at the addresses below.

This proposed development spans a number of tributaries of the Bonet River which provides habitat for salmon, trout and perch. These tributaries provide valuable salmon and trout spawning and nursery habitat, which supports the Bonet River, Lough Gill and Garvogue River fisheries. This system is under environmental pressure and salmon stocks have now fallen below their conservation limit, i.e. the number of spawning salmon required to maintain the fishery. As a result angling in the system is now limited to catch and release only after the 12<sup>th</sup> May, this is a measure introduced to support the recovery of this natural resource. This site is directly hydrologically linked to the Lough Gill Special Area of Conservation which is designated for the protection of Atlantic salmon, white-clawed crayfish and lamprey species.

The Arigna holds good stocks of wild brown trout and the upper reaches of the Arigna River are important for spawning trout, the Arigna River also supports a variety of coarse fish (downstream of Arigna). The Arigna River flows into Lough Allen. Lough Allen supports stocks of the rare endangered and protected species Pollan, listed and protected under Annex 5 of the Habitats Directive. The Irish Pollan (*Coregonus Pollan*) is unique to the Island of Ireland with its current known distribution being limited to five lakes, Lough Neagh, Lower Lough Erne, Lough Ree and Lough Derg (Rosell *et al.* 1997) and Lough Allen (Harrison *et al.* 2009).

The Arigna River is popular with recreational anglers with the main trout angling stretches on the Arigna River upstream of Mount Allen bridge on the Drumkeeran road and downstream of the village of Arigna.



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

Instream works or other works that may give rise to high suspended solids in close proximity to these watercourse or may impact on the Bonet and Arigna Rivers, their tributaries and other salmonid tributaries will be subject to the closed season (i.e. they cannot take place from 1<sup>st</sup> October to 30<sup>th</sup> April, note this date may be extended by Legislative changes in the future.) This is to avoid impacting on the aquatic habitat during the spawning season, and to reduce the potential impact on salmon and trout populations. It would be important that appropriate scheduling of works is allowed for.

In September 2008, the Owengar River was severely polluted as a result of a catastrophic landslide caused by construction activities in association with wind farm and site road construction close to the Upper reaches of the Owengar River in Garvagh Glebe, Drumkeerin, Co. Leitrim. Water samples showed the impact of the pollution spread downstream through the Owengar River as far as Lough Allen over 9 kilometres downstream. The resulting pollution resulted in a fish kill of thousands of fish, mainly brown trout. The peaty material which was displaced into the watercourse led to the destruction of fisheries habitat on a massive scale. It will take many years for the impacted section of the river to recover.

IFI is seriously concerned over the potential for landslides in this area, based on the occurrence of two landslides in close proximity to this site during the construction and clear felling for the neighbouring Garvagh Glebe windfarm, which resulted in significant damage to the fisheries resource and water quality in the Owengar River. The Geological Survey of Ireland have also identified numerous landslides in this area, indicating significant risks from activities involved large scale earth works such as windfarms.

IFI require that an EIA will be produced for the development to measure and identify its potential impacts on the aquatic environment and mitigate against these to ensure that any impact is minimal or non-existent. The EIA must also consider the following:

1. All watercourses that will receive drainage from the construction sites of the turbines or the access roads must be assessed in terms of aquatic biodiversity with particular emphasis on fish, the food of fish, spawning grounds and fish habitat in general. In this regard changes to river morphology should be avoided.
2. The aquatic habitat and physical nature of any watercourse affected by the development must be fully described in detail. This includes areas of open water, pool riffle glide sequences, density and types of aquatic vegetation, description of riparian zones to depth of at least 10 metres on either bank etc. The extent of the surveys should be sufficiently long enough so as to be representative of the habitat contained in that watercourse. There should be a particular focus on sections upstream and downstream of any point where an impact on the watercourse is likely to arise. It may be appropriate to survey a tributary stream and the larger, more important streams it joins, and assess the effect the discharge might further have on biodiversity and fisheries in the larger streams. Surveys of un-impacted (control) streams should also be included in the Environmental Impact Assessment.



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

3. Electrofishing surveys will be required for all waters. Quantitative data in relation to all fish species should be compiled. The presence of salmonid species, crayfish and lamprey species will be of particular concern. In undertaking the electrofishing survey only experienced personnel should be employed. Appropriate permits for electrofishing must be obtained from the Department of Communications, Energy and Natural Resources. Authorised personnel must ensure that they comply with all the conditions contained in the permit.
4. IFI is concerned about soils, their structure and types around all the turbines, turbine pads, associated access roads and site development. A detailed geotechnical survey must be carried out by a qualified professional. The survey must include the impact that works on both the turbines, settlement ponds and access roads and other activities associated with windfarm construction will have either directly (excavations and depositions) or by vibration on the stability of the soils taking into consideration site slope, peat depth and soil type. IFI has serious concerns where it is proposed to construct wind turbines on peat soils especially if these peat soils are located on upland areas.
5. Excessive slopes will be an issue with all wind farm proposals regardless of soil type. The potential for soil movement and landslides should be assessed fully within the EIS.
6. Particular attention should be paid to the hydrology of any site where excavations including excavations for road construction are being undertaken. It is important that natural flow paths are not interrupted or diverted in such a manner as to give rise to erosion or instability of soils caused by an alteration in water movement either above or below ground.
7. Drainage systems must ensure collected waters are returned to the original catchment. A drainage plan should be produced during both the construction phase and the operational phase. This includes waters being pumped from foundations or other excavations. It is particularly important during the construction phase that sufficient retention time in the settlement pond is available to ensure no deleterious matter is discharged to any waters. Settlement ponds must be maintained during the operational phase to allow for the adequate settlement of suspended solids and sediments and prevent any deleterious matter from discharging into any natural waters. In constructing and designing silt traps particular attention should be paid to rainfall levels and intensity. The silt traps should be designed to minimise the movement of silt especially during intense precipitation events where the trap maybe hydraulically overloaded. It is essential that they are located with good access to facilitate monitoring sampling and maintenance.
8. IFI has serious concerns about the construction of roads as these will tend to provide preferential flow paths for surface waters. Considerable attention to detail must be provided in relation to the interception of surface water flows. Our concerns in relation to deleterious matter have been referred to above, but we also have concerns in relation to the flow patterns and to ensuring that normal flows are maintained both during and after





**Iascach Intíre Éireann  
Inland Fisheries Ireland**

construction. Situations can arise where water transportation is significantly increased in certain watercourses thereby putting additional pressures on watercourses and interfering with the sustained flow of water particularly during dry weather. This must be prevented.

9. Serious consideration must be given to the disposal of all waste materials such that they will not give rise to any risk. In terms of risk, the placing of soils on adjacent ground should not be permitted unless all the area has been the subject of an in-depth risk assessment. This is of particular concern where peat soils are encountered. Furthermore drainage from disturbed and stockpiled soils will have to be considered in advance. It may be essential to carry out soil stockpiling operations in confined areas only and to ensure vegetation of the soils with suitable plants which will promote stability. Consideration must be given to leachate from any stockpiles.
10. Details in relation to site offices and associated services should form part of the EIA. In addition details relating to operations during the construction phase to contain pollutants should also be considered. It should be noted that cement leachate, hydrocarbon oils and other toxic poisonous materials will require full containment and should not be permitted to discharge to any waters. Please note that physical pollution of watercourses in terms of dumping of unsuitable gravel material or other construction debris in or stockpiling such materials near watercourses is not acceptable as this will interfere with the aquatic habitat.
11. Cabling and other works required for grid connection and the associated potential impacts should be fully considered within the EIA.
12. The use of sedimentary rocks, such as shale, in road construction should be avoided. This type of material has poor tensile strength and is liable to be crushed by heavy vehicles thereby releasing fine sediment materials into the drainage system which are difficult to precipitate and may give rise to water pollution. Specialist expertise should inform the type of material required for road construction bearing in mind the pressures that will arise during the construction phase and the necessity to avoid pollution due to fines washing out into the roadside drainage.
13. In relation to watercourse crossings please be advised that the IFI must be consulted a minimum of four weeks in advance in relation to all crossings of any watercourse or the use of any temporary diversions. The number and extent of watercourse crossings should be kept to a minimum. Instream structures or bridge crossings must be approved by IFI. In particular in designing crossings the length, slope and width of any instream structure will be important and should mimic the natural channel. Clear span bridges are the preferred option for all crossings especially in upland areas.



14. The EIS should indicate proposals to monitor the impact on all watercourses within the site. In the event that environmental damage to the aquatic habitat and associated riparian zone is caused, the EIS should indicate the steps that may be taken to rectify any damage to the aquatic habitat, including liaison with the appropriate authorities. In relation to wind farm structures and infrastructure it is important that a sufficient bank side riparian zone is maintained to absorb and attenuate overland flows. In deciding the extent of this riparian zone the following factors would be important.
1. Type of soil and its depth and strength especially if the development is on an upland peat bog area.
  2. Stock piling or spreading of spoil on unstable soils especially if the soil is peat with a depth greater than 1metre thick. (Geotechnical survey and assessment at every stage of operation is essential).
  3. Degree or extent of the slope.
  4. Variations in the topography that will give rise to point flows (keep flow as diffuse as possible).
  5. Extent and nature of catchment above the area of operation. In particular meticulous care should be paid to avoid interfering with the catchment and altering the direction of flow, perhaps to another catchment.
  6. The importance of the water in fisheries and biodiversity terms. With reference to the aquatic habitat the impact over a distance downstream must also be kept in mind.
  7. Any other factors that will cause a deleterious effect to the watercourse.

With the above in mind for small streams in upland areas a distance of at least 50 metres (excluding watercourse crossings) should be considered as a bare minimum for a riparian zone free from any development. This should be increased if the factors above are involved and will require site specific survey.

This type of development will comprise works at a number of locations, but the entire development should be considered as a single site. Discussions should take place with the Environmental Section of the relevant County Councils regarding such discharges. All effluent should comply with appropriate quality standards. Cumulative effects of all discharges to each watercourse should be considered in the context of the Water Framework Directive, in this regard you may also need to refer to Roscommon County Council in relation to the Arigna River.

The discharge of polluting or deleterious matter to any watercourse except under and in accordance with a licence may be an offence under the Inland Fisheries Acts and/or under the Water Pollution Acts. It should be noted that even if an effluent does generally comply with the quality standards contained in a licence it may still cause pollution if the receiving water cannot provide sufficient assimilative capacity. With this in mind the environment impact assessment should also focus on the physical characteristics of watercourses and their ability to assimilate any pollutants discharged from the site, including the discharge of water from any foundation works.



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

Should works be approved a detailed method statement addressing the issues outlined above, including all mitigations measures, precautions and environmental incident procedures must be forwarded to and agreed with Inland Fisheries Ireland before works commence.

IFI look forward to further consultation upon receipt of more detailed information specific to this site. It should not be considered that addressing all of the above issues will influence the IFI in any decision it may make in relation to any development. Our concern is to protect the aquatic habitat, including water quality and the related riparian zone which is important in relation to the food of fish. The IFI reserves the right to request additional information in relation to the development should further points arise.

At all times the precautionary principle should be applied throughout for the entire development. Particular attention should be paid to the various environmental directives including the Water Framework Directive. The Inland Fisheries Acts in particular and the Local Government (Water Pollution) Acts and all other environmental legislation should be considered as appropriate. Site management and drainage of the site are crucial and with this in mind a Construction environment management plan, Surface Water Management Plan, Peat Management Plan, including any plans for borrow pits or peat deposition sites and Emergency Response plan must be produced to outline the control and management of these issues on site, especially during the construction phase. These issues should also receive due consideration when preparing and EIA.

A Construction Environmental Management Plan should be produced for the project to include strict control measures to prevent pollution of the aquatic environment during construction and submitted as part of any planning application.

An invasive species survey should be carried out and where species are identified a management plan must be drawn up. Provisions for biosecurity of the aquatic habitat should be included in the EIA.

All works should adhere to IFI's Guideline documents on road construction (attached) and Guidelines on protection of fisheries during construction work in and adjacent to waters <http://www.fisheriesireland.ie/fisheries-and-construction-works>.



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

We recommend that the above issues should be amongst the issues addressed in a comprehensive manner in the EIA. This concludes our observations at this time. Please do not hesitate to contact the undersigned should you have any queries.

Yours sincerely,

---

Catherine Kerins  
Senior Fisheries Environmental Officer  
Drumsna  
Carrick on Shannon  
Co. Leitrim

---

Aisling Donegan  
Senior Fisheries Environmental Officer  
Ardnaree House  
Abbey Street, Ballina  
Co. Mayo

Irish Aviation Authority  
The Times Building  
11-12 D'Olier Street  
Dublin 2, D02 T449,  
Ireland

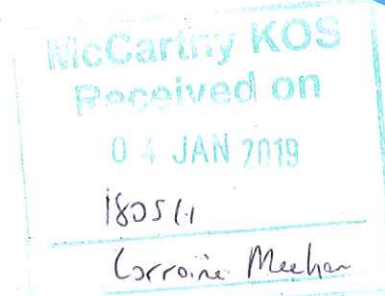
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Foirgneamh na hAmanna  
11-12 Sráid D'Olier  
Baile Átha Cliath 2, D02 T449,  
Éire

T: +353 1 671 8655  
F: +353 1 679 2934  
www.iaa.ie



03<sup>rd</sup> January 2019

Ms Lorraine Meehan  
McCarthy Keville O Sullivan  
Planning & Environmental Consultants  
Block 1, G.F.S.C.  
Moneenageisha Road,  
Co Galway



**Development:** The proposed Creagh Wind Farm, located approximately 3.8 kilometers west of Drumkeeran, Co. Leitrim. The majority of the site is located within Co. Leitrim, with the southern extent of the site extending into Co. Sligo. Ref: 180511

Dear Lorraine

I refer to the request for planning permission for the above development, details of which were received by the Irish Aviation Authority from your company.

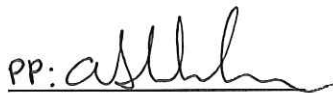
It is the observation of the Irish Aviation Authority that in the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to:

- (1) Agree an aeronautical obstacle warning light scheme for the wind farm development,
- (2) Provide as-constructed coordinates in WGS84 format together with ground and tip height elevations at each wind turbine location

<i>Turbine No.</i>	<i>WGS-84 Co-ordinates</i>	<i>Ground elevation (Malin Head OD)</i>	<i>Blade tip elevation of turbine (Malin Head OD)</i>	<i>Height of turbine (height from ground level to blade tip)</i>	<i>Confirm if turbine has obstacle lighting.</i>
T1	53.346125, -6.258288	75m	225m	150m	No

- (3) Notify the Authority of intention to commence crane operations with a minimum of 30 days prior notification of their erection."

Yours sincerely

PP: 

Deirdre Forrest  
Corporate Affairs

Bord Stiúirthóirí/Board of Directors  
Michael McGrail (Cathaoirleach/Chairman),  
Peter Kearney (Príomhfheidhmeannach/Chief Executive)  
Marie Bradley, Ernie Donnelly, Michael Norton

Oifig Chláraithe:  
Foirgneamh na hAmanna, 11-12 Sráid D'Olier  
Baile Átha Cliath 2, D02 T449, Éire  
Uimhir Chláraithe: 211082. Áit Chláraithe: Éire  
Cuideachta Dlíleanais Theoranta

Registered Office:  
The Times Building, 11-12 D'Olier Street  
Dublin 2, D02 T449, Ireland  
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# IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA HÉIREANN

Lullymore, Rathangan, Co. Kildare, Ireland R51 V293  
Liolach Mór, Rath Iomgáin, Co. Chill Dara, Éire, R51 V293

Tel/Teil: +353-(0)45-860133  
e-mail/ríomhphost: bogs@ipcc.ie weblidir/for: www.ipcc.ie

Lorraine Meehan  
McCarthy Keville O'Sullivan Ltd  
Block 1, G.F.S.C  
Moneenageisha Road  
Galway  
imeehan@mccarthykos.ie

11th January 2019

**Re: Proposed Croagh Wind Farm - County Leitrim**

Dear Ms Meehan,

Thank you for consulting the Irish Peatland Conservation Council regarding the proposed Croagh Wind Farm. The Irish Peatland Conservation Council (IPCC) was established in 1982 and has 35 years of experience in peatland conservation. Our aim is to conserve a representative sample of intact peatlands. While it has been estimated that only 1% of Ireland's original extent of raised bogs remain, only 10% of this remains in a conservation worthy state. This is due to a number of factors including domestic/industrial peat extraction and habitat fragmentation (*Ireland's Peatland Conservation Action Plan 2020*, Malone & O'Connell, 2009).

Our work is guided by our 6th Action Plan, *Ireland's Peatland Conservation Action Plan 2020*, which was published in 2009. A copy of this document is available for download on our website at [www.ipcc.ie](http://www.ipcc.ie). Many of the actions in our plan have been included within the National Peatlands Strategy which has been adopted by every Government Department and Local Authority. The National Peatlands Strategy can be downloaded from [www.npws.ie](http://www.npws.ie).

## Legal Obligations to Protect Peatlands - County Leitrim

We are legally bound by National and European legislation (The Wildlife Acts, E.U. Habitats and Bird's Directives) and international conventions (Ramsar, Bern Convention, Convention on Biological Diversity) to do our utmost to protect peatlands now and for future generations. In County Leitrim specifically, only 6.65% of the original extent of raised bog remain intact and only 20.72% of blanket bog remain intact (Bogs & Fens of Ireland Conservation Plan 2005, Foss, O'Connell, Crushell, 2001). Peatland habitats have been severely diminished in the country and this destruction is an issue in other legislation and conventions such as the UN Convention on Climate Change, Bonn Convention, World Heritage Convention, Water Framework Directive, Environment Liability Directive, Planning and Development Acts, National Monuments Acts, Environmental Directive, EIA and SEA. All of these legislative instruments have been adopted by Ireland and the IPCC ask that you assess your development with regard to these legal obligations.

## Bogland

The IPCC would advise any developer planning construction in, or within close proximity to peatland habitat to be familiar with the Environmental Protection Agency funded project BOGLAND ([www.ucd.ie/bogland](http://www.ucd.ie/bogland)). This project recommends the best practice guidelines to ensure no damaging development occurs on, or affects peat soils and peatlands of conservation/biodiversity value. We urge developers to properly assess and screen for any adverse impacts on the habitat or species utilising them that may occur during the construction of any infrastructural development such as solar farms. We would also implore developers to have proper plans in place for the habitat regarding after-use rehabilitation/restoration. The IPCC could not support a development that does not plan in a conservation responsible manner.

## Designated Sites (Map 1)

There is a number of designated sites within 15km of the proposed wind farm. The sites within the immediate vicinity are...

**35 YEARS TAKING ACTION FOR BOGS AND WILDLIFE**

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Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/Rúnaí Comhlacht: Rachel Kavanagh  
Directors/Stiúrthóirí: Martin Kelly, Catherine O'Connell, Rachel Kavanagh, Jennifer Roche, Seán Ó Fearghail,

Patrons/Pátrúnaí: Pauline Bewick, Don Conroy, HRH Princess Irene of the Netherlands,  
Eanna Ní Lamhna, Matthijs Schouten, His Excellency Mr Peter Kok Netherlands Ambassador to Ireland

**Corry Mountain Bog NHA :-** This site is an upland blanket bog and is already threatened and sustaining damage from peat cutting, grazing and a wind power generation facility. The site is utilised by Red Grouse (Annex II(I), III(II) of the EU Birds Directive, Hen Harrier (Annex I of the EU Birds Directive) and Golden Plover (Annex I, II(II), III(III) of the EU Birds Directive).

**Carrane Hill Bog NHA :-** Peat cutting, grazing, quads and forestry (some of which has failed) have all been listed as damaging activities within the NPWs site synopsis for this designated area.

**Kilronan Mountain Bog NHA :-** Habitat loss within this protected site has been caused by afforestation, peat cutting, burning and grazing. There has also been habitat loss from a wind farm installation. Altogether they have altered the hydrology of the site locally.

There are many sites which will be connected hydrologically to the location of the proposed wind farm, such as Meharth Lough (sitecode 01900) which contains rare fen habitat and is sensitive to any nutrient or hydrological changes.

### **Curlew (Map 2)**

The Curlew is one of the most endangered species in Ireland and the breeding population has declined by 78% over the past 40 years with less than 130 breeding pairs left (Birdwatch Ireland I-WeBS Newsletter August 2017). The IPCC would like to remind you that this bird is listed as an ANNEX II section II bird species within the E.U. Birds Directive [Council Directive 79/409/EEC] and also has a national status of Red on the Birds of Conservation Concern in Ireland list. The National Curlew Task Force is working to bring this species back from near extinction in Ireland and we would urge developers to liaise with them. The conservation of this species is of utmost concern. There is currently a national initiative to protect this species. Map 2 shows the locations of previous curlew sightings (data from National Biodiversity Data Center).

### **Water Quality (Map 3)**

Ireland has an obligation under the Water Framework Directive to ensure that our waterways are of “Good Ecological Status”. The river network around the vicinity of the proposed site are varied in quality, ranging from poor to high. We would insist that, at the pre-planning stage, the effects of the construction and operation of a wind farm at Croagh will have on water quality be fully investigated. Please ensure that there will be adequate testing and contingency plans in place to make certain that these rivers are not damaged by developments but improved hydrologically and ecologically. There may also be waterways which have not been assigned or tested with the EPA’s WFD programme and these should be monitored also for baseline levels and continuous assessment. Any affected river routes may also damage protected sites further afield which would be disastrous for Ireland’s designated area network.

### **BirdWatch Ireland Species Sensitivity to Windfarms Score ( Map 4 & 5)**

The proposed site is overlapping with an area that BirdWatch Ireland has deemed sensitive to wind farm development as it would affect any Curlew in the area. The proposed site is also surrounded by areas regarded sensitive to wind farm development due to the species and habitats recorded.

### **Wetland Surveys Ireland (Map 6)**

Wetland Surveys Ireland have data pertaining to the location of a number of wetland sites local to the proposed development. Please ensure that these sites have been given a full ecological and hydrological survey to guarantee that there will be no important species or habitats lost through poor development. Please liaise with Wetland Surveys Ireland about these sites.

WMI\_LE321, WMI\_LE322, WMI\_LE320, WMI\_LE378, WMI\_SO346, WMI\_LE323

### **Geological Survey of Ireland Landslide Susceptibility (Map 7)**

This map shows that there is a high chance landslide events may occur within the locality of the proposed wind farm. Landslides are disastrous for wildlife (aquatic and terrestrial).

### **EPA National Soils DB - Peat**

Most of the footprint of the proposed windfarm is situated on peat soils. Peat is very sensitive to development and will require extra stringent planning procedures. Peat sediments can make their way into the river network, pollution from construction spillages can affect the peatland flora and fauna and peat slippages may occur.

### **Invasive Species**

Please refer to [www.npws.ie](http://www.npws.ie), National Biodiversity Action Plan 2017-2021 and Ireland’s Peatland Conservation Action Plan 2020 for information regarding the need to control invasives. Peatlands are susceptible to invasive species during and after construction works due to the use of vehicles from other construction sites that carry foreign soil into the area, increased traffic and damage/drainage to peatland. Any development planned on or near peatland should have a management plan in place to eliminate the risk of alien species and protect Ireland’s native biodiversity through not only the construction phase but also the operational stage.

### **County Leitrim Development Plan**

Map 9 shows that the proposed site is situated within an area described within the Counties Development Plan as an Area of High Visual Amenity and is surrounded by Areas of Outstanding Views.

**Conclusion**

The IPCC could not support this development as there is little intact blanket bog left in County Leitrim. The proposed site is situated in the middle of a vast area of protected reserves which already have many threats and pressures. The NPWS state in Site Synopses for the adjacent designated sites that wind power generation has already caused loss of habitat. This is unacceptable. The construction work and transport/access roads will cause more fragmentation to designated sites and the NPWS state "long term survival (of the designated areas) requires sensitive management".

As native breeding Curlew are extremely rare and the proposed footprint of the site is within an area deemed to be sensitive to wind farm development for Curlew the IPCC would not see it is a good idea to erect wind farms in this area. Curlew are extremely site loyal and any disturbance is likely to affect their behaviour in a way that is detrimental to the populations survival.

There is a high chance of landslides due to the area being upland peatland and as assessed by the Geological Survey of Ireland. This adds unnecessary risk to the protected sites adjacent to the proposed wind farm.

The County Development Plan describes the proposed site as being within Areas of Outstanding Views & Prospects and is an Area of High Visual Amenity. There are already windfarms in this area and any more is going to disrupt the intact wilderness.

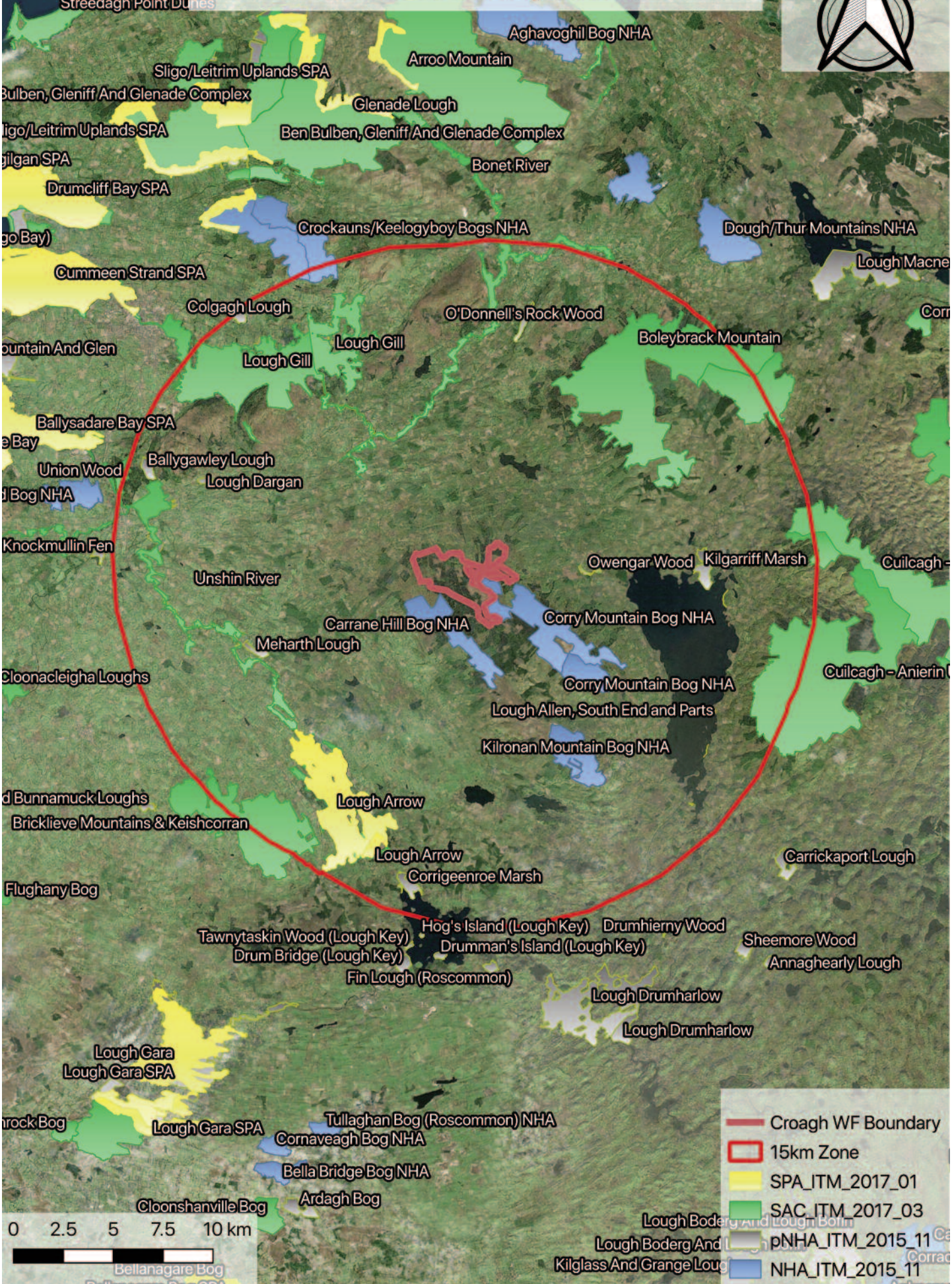
Thank-you for taking the time to read this and please inform me if this project goes to planning.



Tristram Whyte B.Sc (hons)  
Conservation Policy & Fundraising Officer

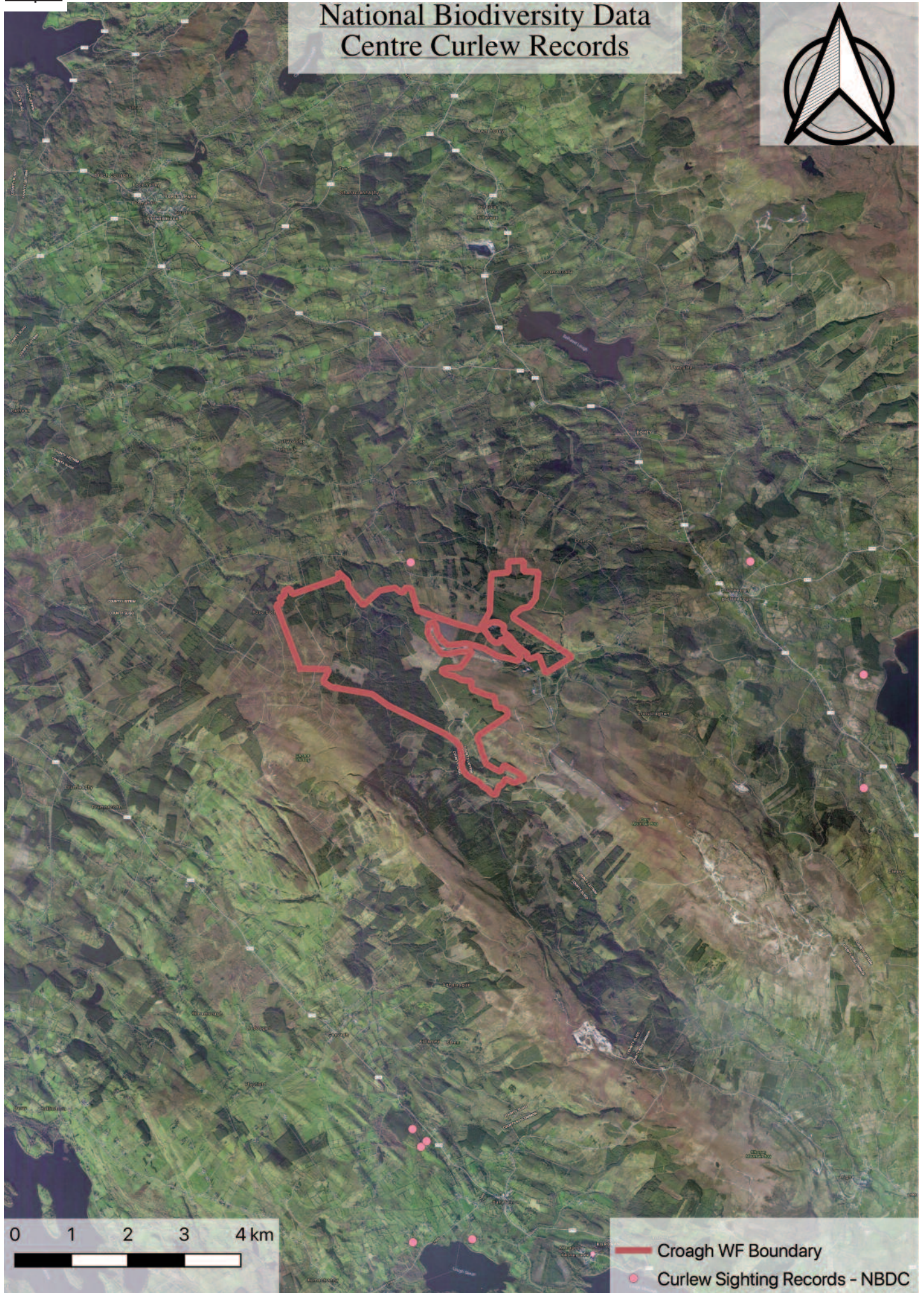


Map 1 15km Zone - Designated Sites - Proposed Croagh Wind Farm - County Leitrim



Map 2

# National Biodiversity Data Centre Curlew Records

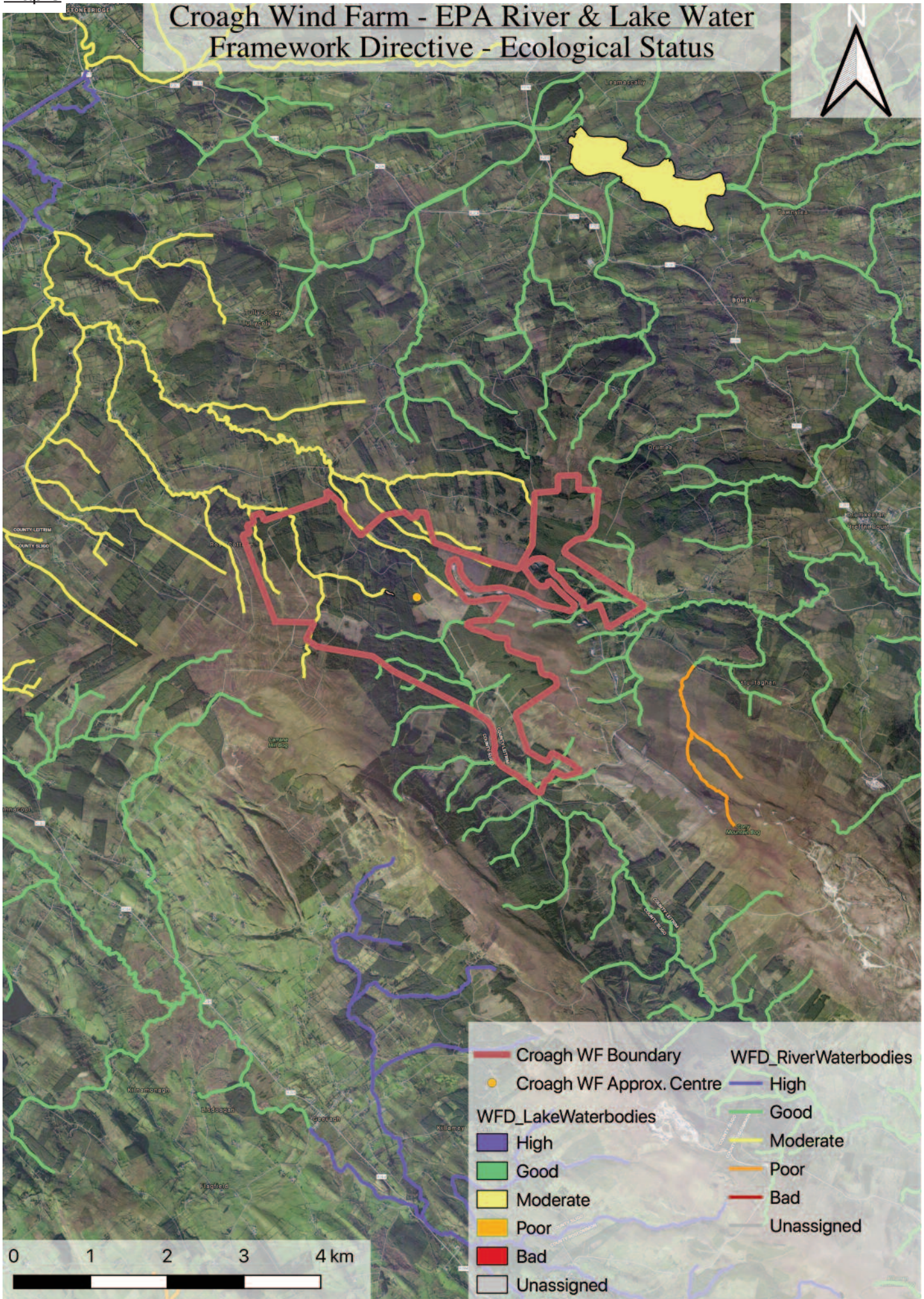


0 1 2 3 4 km

— Croagh WF Boundary  
● Curlew Sighting Records - NBDC

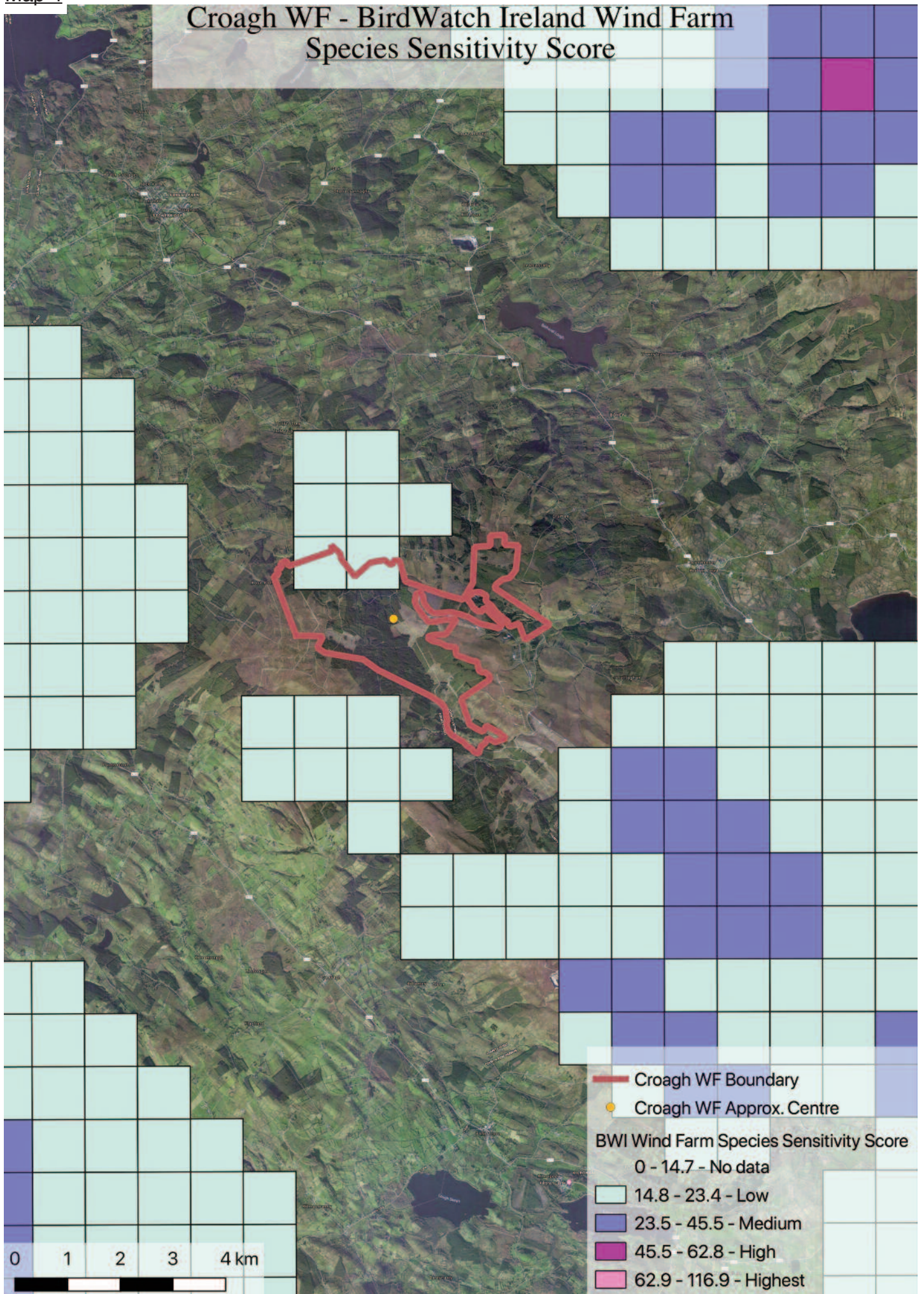
Map 3

# Croagh Wind Farm - EPA River & Lake Water Framework Directive - Ecological Status

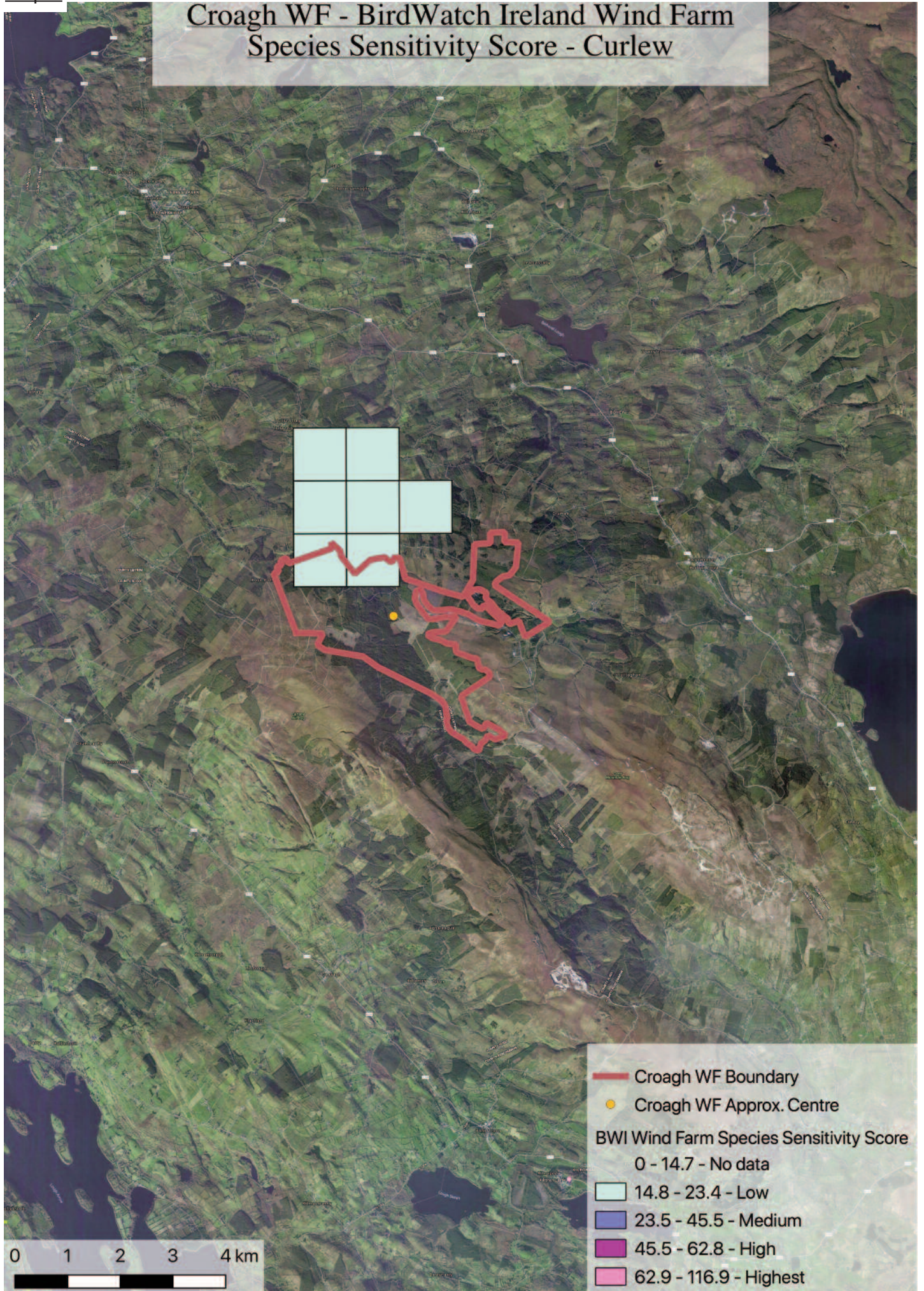


Map 4

# Croagh WF - BirdWatch Ireland Wind Farm Species Sensitivity Score



# Croagh WF - BirdWatch Ireland Wind Farm Species Sensitivity Score - Curlew



Map 6

Map

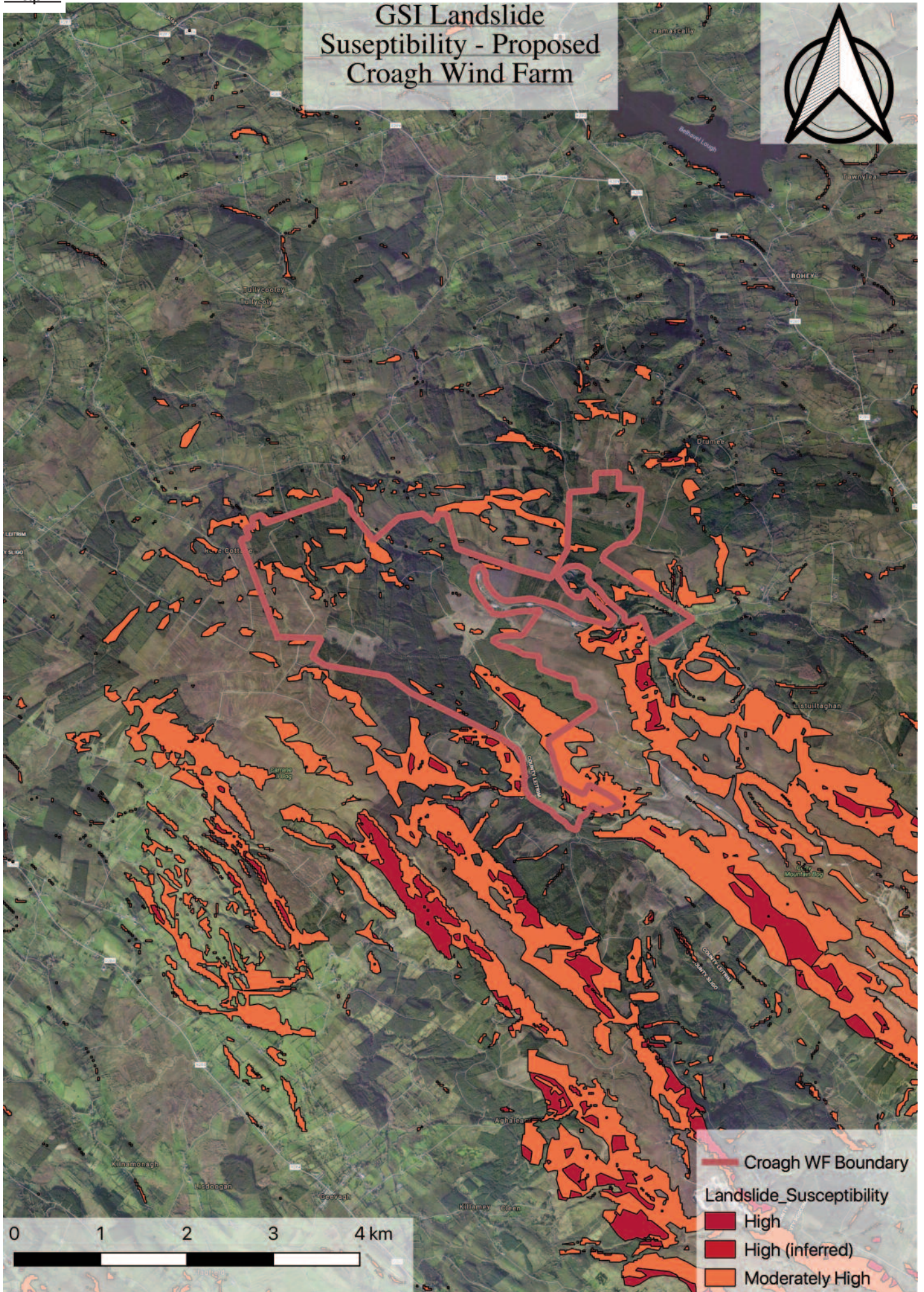
Satellite



Google

Map data ©2019 Google Imagery ©2019, DigitalGlobe, Landsat / Copernicus | Terms of Use | Rep...

Map 7



Map 8

# EPA National Soils DB - Proposed Croagh Wind Farm





Map 9





**OPW**

Oifig na nOibreacha Poiblí  
The Office of Public Works

Ms Lorraine Meehan  
McCarthy Keville O'Sullivan  
Block 1, G.F.S.C  
Moneenageisha Road  
Galway



Ceann Oifig  
Sráid Jonathan Swift  
Baile Átha Troim  
Co. na Mí  
C15 NX36

Head Office  
Jonathan Swift Street  
Trim  
Co Meath  
C15 NX36

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Facs/Fax: (046) 948 1793  
Íosghlao/LoCall 1890 213414  
Suíomh gréasáin/website: www.opw.ie

**Our Ref: 636 – 2018**  
**Your Ref: 180511**

**Re: EIA Scoping Document for Proposed Croagh Wind Farm, Co. Leitrim**

Dear Ms Meehan,

I refer to your letter dated 14/12/18 in relation to the above.

The proposed site boundaries of Croagh Wind Farm is located outside the boundary of the Bonet Catchment Drainage Scheme and does not interfere with scheme channels.  
(See attached map below)

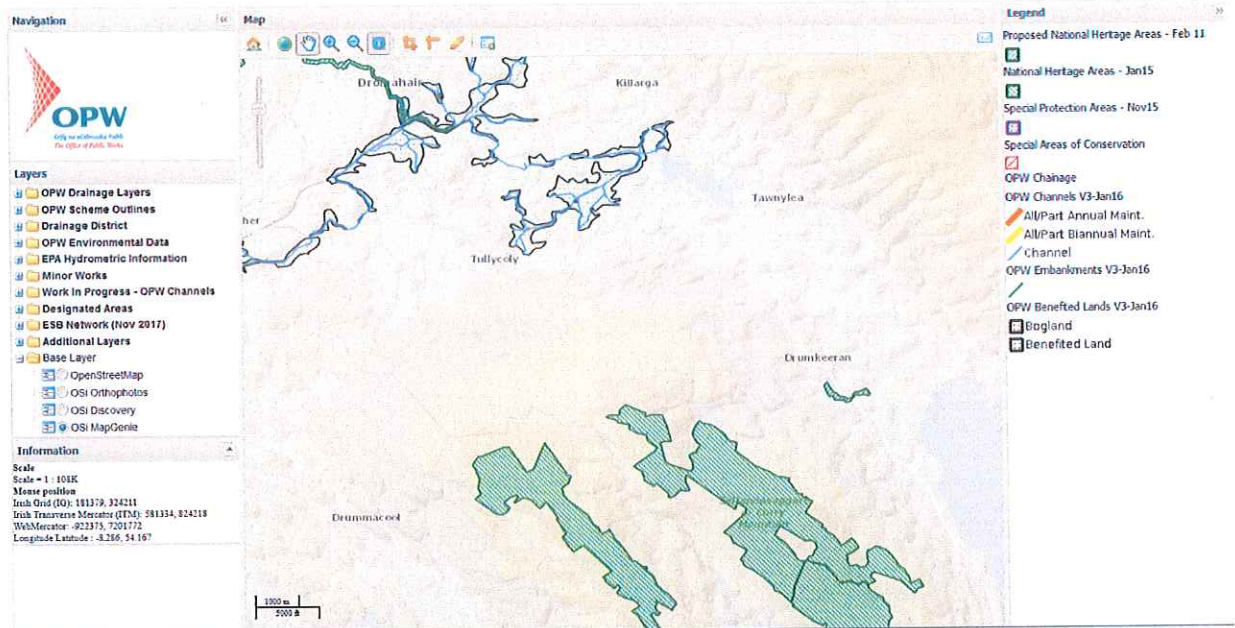
There are no records of flooding identified for this area, see attached map and summary report from the Flood Hazard Mapping website ([www.floodmaps.ie](http://www.floodmaps.ie)). This office would recommend that no flooding should occur during or after construction of the proposed wind farm.

The attached Preliminary Flood Risk Assessment Maps (PFRA) indicates the areas that are prone to flooding for the 1% AEP (100-year) flood event for the Western CFRAM area, and as such further information will become available with public consultation of draft flood hazard mapping in 2015 and the flood risk report in 2016. Information is available at the following website: <http://www.westcframstudy.ie/downloads.aspx>

Under Section 50 of 1945 Arterial Drainage Act, No person, including a body corporate, shall construct any new bridge or alter, reconstruct, or restore any existing bridge over any watercourse without the consent of the Commissioners or otherwise than in accordance with plans previously approved of by the Commissioners. It will be a requirement of the applicant to apply for Section 50 consent for all culverts and bridges in accordance with the Act.

Yours sincerely

Karen Donovan  
Engineering Services Administration Unit  
9<sup>th</sup> January 2019



[http://gis-demo/frm/drainage\\_programme/map/](http://gis-demo/frm/drainage_programme/map/)

## Lorraine Meehan

---

**From:** Piotr Zurek [mailto:piotr.zurek@ripplecom.net]

**Sent:** 16 August 2018 17:10

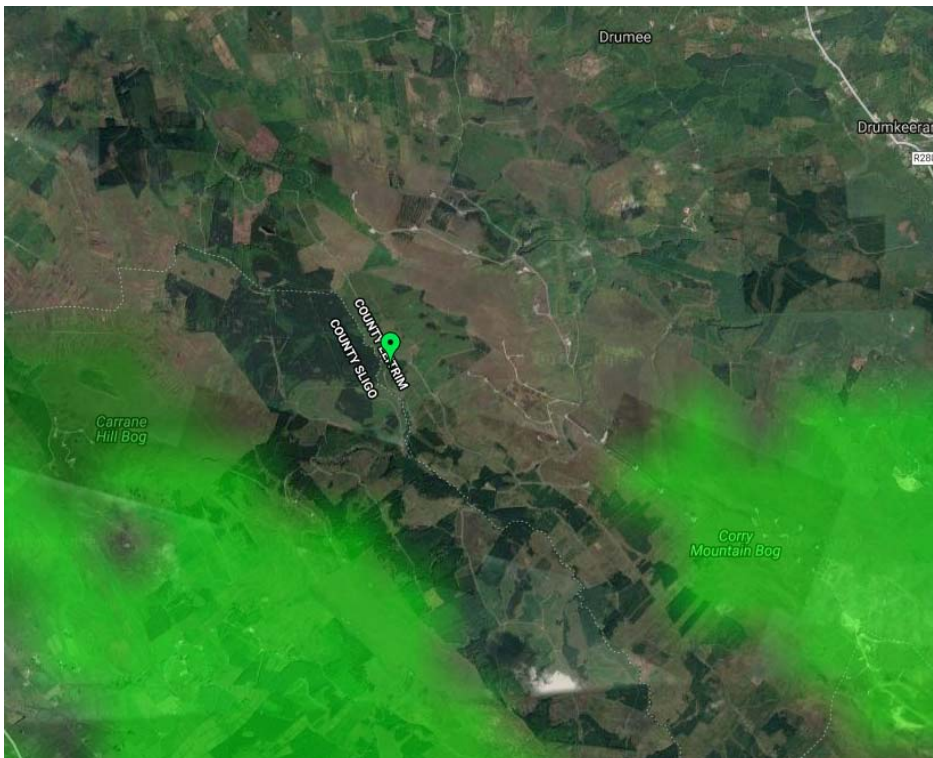
**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>

**Cc:** Denis Herlihy <denis.herlihy@ripplecom.net>; Adrian Carroll <adrian.carroll@ripplecom.net>

**Subject:** RE: 180511 Carrane Hill WF, Co Leitrim

Hi Lorraine,

Please find attached screenshot of our network coverage map for the mentioned area. We don't have any Point-to-Point links or customers present around there.



Kind Regards,

Kind Regards,

**Piotr Zurek** | Commercial Manager



25<sup>th</sup> February, 2019

McCarthy Keville O'Sullivan Ltd,  
Block 1, G.F.S.C.,  
Moneenageisha Road,  
Co. Galway.

McCarthy ROS  
Received on  
27 FEB 2019  
180511  
Lorraine Meahan

**RE: EIA Scoping Document for Proposed Croagh Wind Farm, Co. Leitrim**

\*\*\*\*\*

A Chara,

I acknowledge receipt of your scoping request for the proposed Wind Farm Development at Carrane Hill, Garvagh, Killavoggy, Co. Leitrim received on 25<sup>th</sup> February, 2019.

I wish to advise that your request has been referred to the North Roscommon Area Planner for consideration and comments (if any).

If you require any further information, please do not hesitate to contact me.

Yours sincerely,



David Caffrey  
Administrative Officer,  
Planning,  
Aras an Chontae,  
Roscommon.

Lorraine Meehan,  
McCarthy Keville O'Sullivan Ltd.,  
Planning & Environmental Consultants,  
Block 1, G.F.S.C.,  
Moneenageisha Road,  
Galway.

28 FEB 2019  
180511  
L. Meehan

27<sup>th</sup> February, 2019  
Your Ref.: 180511

Re: EIA Scoping Document for Proposed Croagh Wind Farm, Co. Leitrim.  
=====

A Chara,

Thank you for the opportunity to comment on the above. Roscommon County Council, Environment Section, has no comments to make in relation to this scoping document.

Is mise, le meas,

Kieran Madden,  
Senior Engineer,  
Environment, Assets & Energy Management

26<sup>th</sup> February, 2019

26 Feb 2019  
180511  
M. Watson

McCarthy Keville O'Sullivan Ltd,  
Block 1, G.F.S.C.,  
Moneenageisha Road,  
Co. Galway.

RE: EIA Scoping Document for Proposed Croagh Wind Farm, Co. Leitrim

\*\*\*\*\*

A Chara,

I refer to your scoping request for the proposed Wind Farm Development at Carrane Hill, Garvagh, Killavoggy, Co. Leitrim received on 25<sup>th</sup> February, 2019.

Roscommon County Council acknowledges the level of detail provided in the Scoping Report.

Roscommon County Council advises that the Roscommon Renewable Energy Strategy be referred to in relation to assessing wind energy developments and the associated potential environmental impacts.

If you require any further information, please do not hesitate to contact me.

Yours sincerely,

David Caffrey  
Administrative Officer,  
Planning,  
Aras an Chontae,  
Roscommon.

28 Feb 2019  
180511  
M. Watson

26<sup>th</sup> February, 2019

McCarthy Keville O'Sullivan Ltd,  
Block 1, G.F.S.C.,  
Moneenageisha Road,  
Co. Galway.

RE: EIA Scoping Document for Proposed Croagh Wind Farm, Co. Leitrim

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Yours sincerely,

David Caffrey  
Administrative Officer,  
Planning,  
Aras an Chontae,  
Roscommon.





Comhairle Contae  
Ros Comáin  
Roscommon  
County Council



McCarthy Keville O'Sullivan Ltd,  
Block 1, G.F.S.C  
Moneenageisha Road,  
Co Galway.

Copy received  
07 MAR 2019  
180511  
Lorraine Meehan

Re : EIA Scoping Document for Proposed Croagh Wind Farm, Co Leitrim

05.03.19

Dear Lorraine,

Thank you for the opportunity to comment on the proposed Croagh Wind Farm in Co Leitrim.

RCC Roads section would possibly have some concerns in relation to the roads network and drainage impacts.

**Roads:**

Our only concerns from a roads perspective would be that the transportation of heavy plant/abnormally large loads and materials would not adversely impact on the public road network or existing bridges/culverts if it is proposed to transport via RCC network. A structural integrity assessment may be required for identified structures that may be of risk. Junction layouts would also need assessment.

**Drainage:**

The impacts of any drainage works/re-contouring should be assessed to establish if there would be any knock on effects which may contribute to flooding issues in County Roscommon.

Regards

Denis

Denis Whyte

Assistant Engineer

Roads and Transportation

Roscommon County Council.

## Lorraine Meehan

---

---

**From:** Johnny Evans [mailto:Johnny.Evans@2rn.ie]

**Sent:** 20 August 2018 12:05

**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>

**Subject:** RE: 180511 Carrane Hill WF, Co Leitrim

Hi Lorraine,

Our telecoms links will be unaffected by anything within the rectangle in the shapefile. There would be a risk of disruption to TV viewers to the south of this zone though, and I would recommend that we have a protocol agreement in place. Thanks and regards, Johnny

### **Johnny Evans**

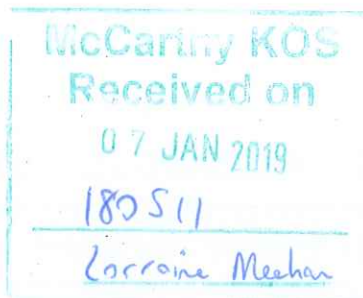
Head of Projects and Coverage Planning

2RN

Block B, Cookstown Court, Old Belgard Road, Tallaght, Dublin 24, Ireland

D24 WK28

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3<sup>rd</sup> January, 2019.

Ms. Lorraine Meehan,  
McCarthy Keville O'Sullivan Ltd.,  
Block 1, G.F.S.C.  
Moneenageisha Road,  
Galway.

Re:- **EIA Scoping Document for Proposed Croagh Wind Farm, Co. Leitrim.**  
~~~~~

Dear Ms. Meehan,

I refer to your correspondence to this office dated 14<sup>th</sup> December, 2018 in relation to the above. I wish to advise you that Mr. Barry Ward, Executive Planner and Ms. Siobhan Ryan, Heritage Officer, have examined the EIA Scoping Document received by Sligo County Council on 17<sup>th</sup> December, 2018 and have the following comments to make in relation to same:-

**Section 2.3 Designated Areas**, states that "A Natura Impact Statement will also be prepared"

Sligo County Council comments that an NIS may not be required unless a pathway/pathways for potential impacts have been identified, in a Stage 1 Screening Report. What potential impacts have been identified to indicate that an Natura Impact Statement is required?

**Section 4.2, Site Selection Criteria, Planning History Review**, states that "The EIAR will include a comprehensive assessment of the potential for cumulative effects from the proposed wind farm in combination with all existing and permitted wind farms within 20 kilometres of the site.

Sligo County Council comments that it is essential that potential for cumulative effects of the proposed development and existing and permitted development in the area are assessed in EIAR. Particularly in terms of potential visual and environmental impacts.

**Section 4.2, Site Selection Criteria, Ecological Desk Survey,** states that, "Bird surveys are also underway".

Sligo County Council comments that the EIAR shall clarify which bird surveys were undertaken and was Bat survey carried out?

**Section 4.2 Site Selection Criteria, Grid Connection Feasibility.**

Sligo County Council comments that the EIAR shall clarify/confirm whether or not any part of the proposed grid connection will be laid/constructed in County Sligo.

**Section 6.2.4 – 6.2.4.4 Description of the proposed development.**

Sligo County Council comments that the proposed Construction and Environmental Management Plan shall include detail of an Ecological Clerk of Works.

**Section 6.2.4.6 Biodiversity: Flora and Fauna,**

Sligo County Council comment the EIAR shall address,

- Flora Protection Species
- Birds of Conservation concern
- Birds of Prey
- The Standard Methodology for Habitat Survey and Mapping in Ireland shall be to Fossit Level 3.


**Section 6.2.4.13 Archaeological, Architectural and Cultural Heritage,**

Sligo County Council comment that the EIAR shall,

- Clarify if the proposed haulage routes cross any historic bridges?
- If so, is bridge strengthening required? Potential impacts on Birds/Bats.
- Include a list of protected structures and associated cartilages.

Yours sincerely,



 Janet McNamara,  
Administrative Officer,  
Planning.

## Lorraine Meehan

---

**Subject:** FW: 180511 Carrane Hill WF, Co Leitrim

**From:** Thomas Barry [mailto:Tom.Barry@TETRAIRELAND.IE]

**Sent:** 22 August 2018 09:14

**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>

**Subject:** RE: 180511 Carrane Hill WF, Co Leitrim

Lorraine,

The development as proposed presents no network/coverage concerns to TI.  
Can you ensure that the proposal is reviewed by eir.

Regards,  
Tom

## Lorraine Meehan

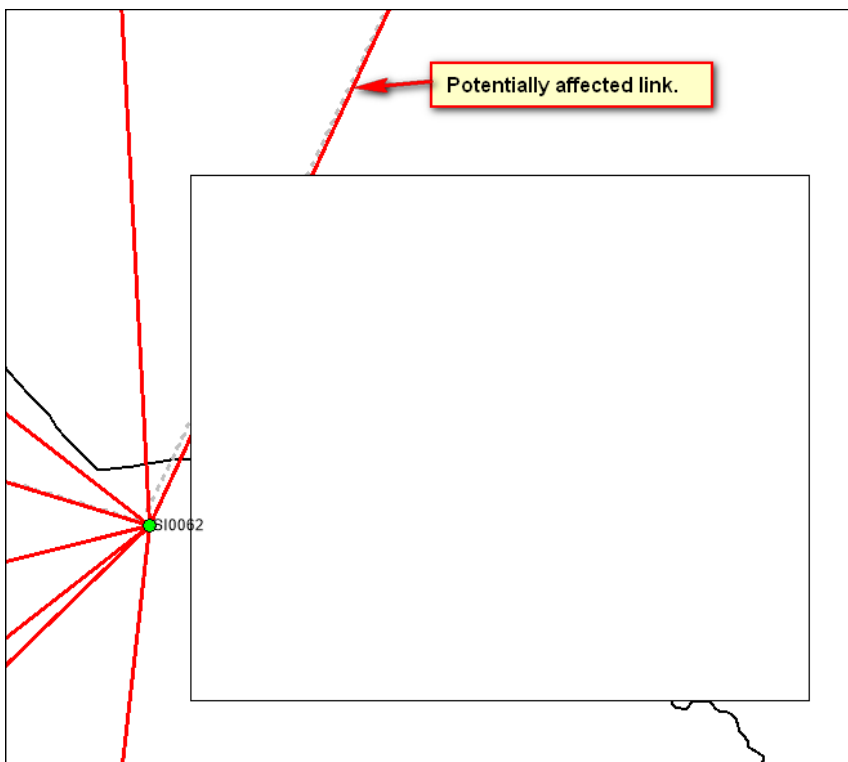
---

**From:** Gerry Callan [mailto:Gerry.Callan@three.ie]  
**Sent:** 16 August 2018 10:55  
**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>  
**Cc:** Alan Hutchinson <alan.hutchinson@three.ie>  
**Subject:** RE: 180511 Carrane Hill WF, Co Leitrim

Hi Lorraine,

I can confirm that we have one link that traverses the planned development area, a 15GHz link from Killarga (187822, 334456) to Riverstown (182127, 322184).

We have a further 7 links west of the development, but none of them traverse the development area.



When you have confirmed turbine locations, do please let us know and we can conduct a more thorough analysis of any potential impact, but for now this is the only link likely to be affected by the development.

Best wishes,



**Gerry Callan**  
Transmission Engineer

086 3884246  
[gerry.callan@three.ie](mailto:gerry.callan@three.ie)



**Make it count.**

## Lorraine Meehan

---

**From:** Rachel Hennessy [mailto:rachel.hennessy@towercom.ie]

**Sent:** 22 August 2018 17:12

**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>

**Subject:** RE: 180511 Carrane Hill WF, Co Leitrim

Hi Lorraine,

Thank you for your email.

From initial review, the proposed location of the windfarm would not appear have a significant impact on Towercom's sites.

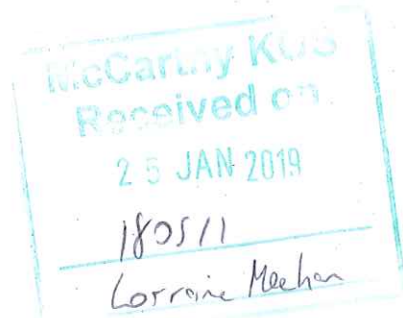
However, in order to fully assess any impact it may have, we would require plans and coordinates showing the proposed turbines finalised locations.

Until such time as you can confirm the coordinates of the locations, we cannot conclusively say if there will be an impact on Towercom's assets.

Kind regards,  
Rachel

Rachel Hennessy  
**Towercom**

Ms. Lorraine Meehan  
McCarthy Keville O'Sullivan Ltd.  
Block 1  
G.F.S.C.  
Moneenageisha Road  
Galway



Dáta | Date  
23 January 2019

Ár dTag | Our Ref.  
TII18-104268

Bhur dTag | Your Ref.  
180511

**Re: EIA Scoping Request for proposed wind farm development at Croagh, Co. Leitrim with site extents in the Counties of Leitrim and Sligo on behalf of Coillte.**

Dear Ms. Meehan,

Transport Infrastructure Ireland (TII) acknowledges receipt of your EIAR Scoping request in respect of the above proposed project.

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid application referred.

The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidance as outlined in the Spatial Planning and National Roads Guidelines for Planning Authorities (2012). Regard should also be had to other relevant guidance available at [www.TII.ie](http://www.TII.ie).

In this instance, the proposal is stated to be located at a site of approximately 800 ha. at Croagh on the northeastern slopes of Carrane Hill, Garvagh, Killavoggy, Co. Leitrim. The site encompasses lands within Co. Sligo, but it is the stated intention of the applicant to locate all site infrastructure in Co. Leitrim and make application to that county for planning permission. It is stated that it is expected that 10 turbines will comprise the proposed windfarm that is undergoing final design.



With respect to EIAR Scoping issues, the recommendations indicated below provide only general guidance for the preparation of EIAR, which may affect the National Roads Network. The developer should have regard, *inter alia*, to the following;

1. As set down in the Spatial Planning and National Roads Guidelines, it is in the public interest that, in so far as is reasonably practicable, that the national road network continues to serve its intended strategic purpose. The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network in order to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.
2. Consultations should be had with the relevant local authority/National Roads Design Office with regard to locations of existing and future national road schemes.
3. In relation to cabling and potential connection routing, the scheme promoter should note locations of existing and future national road schemes and develop proposals to safeguard proposed road schemes. In the context of existing national roads, alternatives to the provision of cabling along the national road network, such as alternative routing or the laying of cabling in private lands adjoining the national road, should be considered in the interests of safeguarding the investment in and the potential for future upgrade works to the national road network. The cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.
4. Clearly identify haul routes proposed and fully assess the network to be traversed. Separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed.
5. Where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. TII's TTA Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the TII TTA Guidelines which addresses requirements for sub-threshold TTA.
6. TII Standards should be consulted to determine the requirement for Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA).
7. Assessments and design and construction and maintenance standards and guidance are available at [TII Publications](#) that replaced the NRA Design Manual for Roads and Bridges (DMRB) and the NRA Manual of Contract Documents for Road Works (MCDRW).

8. The developer, in conducting Environmental Impact Assessment, should have regard to TII Environment Guidelines that deal with assessment and mitigation measures for varied environmental factors and occurrences. In particular;
  - a. TII's Environmental Assessment and Construction Guidelines, including the *Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes* (National Roads Authority, 2006),
  - b. The EIAR should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see *Guidelines for the Treatment of Noise and Vibration in National Road Schemes* (1<sup>st</sup> Rev., National Roads Authority, 2004)).

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.

I hope that the above comments are of use in your scoping process.

Yours sincerely,



**Natasha Crudden**  
**Regulatory & Administration Unit**

## Lorraine Meehan

---

**From:** Liam Allister [mailto:Liam.Allister@virginmedia.ie]

**Sent:** 16 August 2018 13:31

**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>

**Cc:** Cathal O Donnell <Cathal.ODonnell@virginmedia.ie>

**Subject:** RE: 180511 Carrane Hill WF, Co Leitrim

Hi Lorraine,

Virgin Media do not have any radio links in or near the area outlined in the site location map. Can you please inform us if there is any change to the proposed site area.

Regards,

Liam Allister,

Transmission Engineer,

Virgin Media Ireland.

[Liam.allister@virginmedia.ie](mailto:Liam.allister@virginmedia.ie)

---

## Lorraine Meehan

---

**From:** Gavin Byrne [mailto:gavin.byrne@netshare.ie]

**Sent:** 16 August 2018 16:58

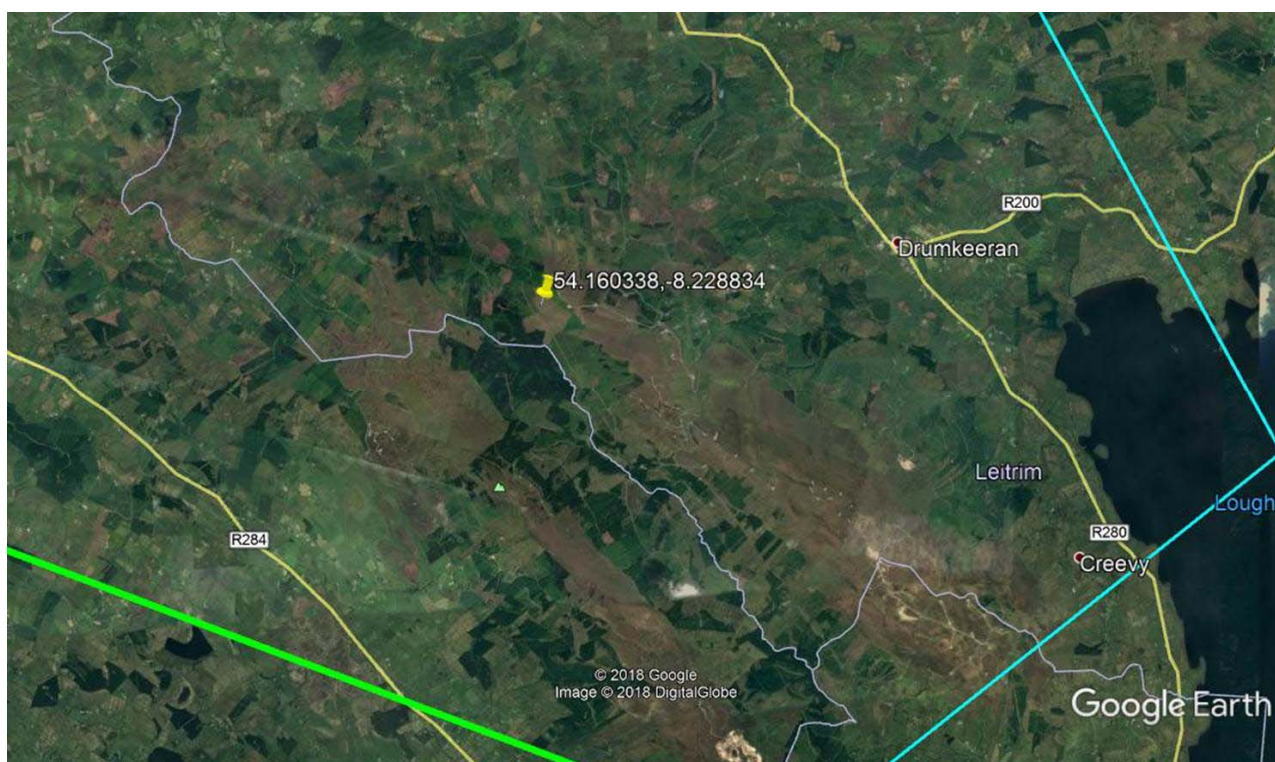
**To:** Lorraine Meehan <lmeehan@mccarthykos.ie>

**Cc:** Kevin O'Neill <kevin.oneill@netshare.ie>; Darragh Dennehy <darragh.dennehy@netshare.ie>; Deirdre McDermott <deirdre.mcdermott@netshare.ie>

**Subject:** RE: 180511 Carrane Hill WF, Co Leitrim

Hi Lorraine,

This area is clear of Vodafone microwave links and should not be an issue.



Regards,

Gavin Byrne BE, MSc, MIEI

Transmission Planning & Strategy Engineer

Netshare Ireland

Iveagh Building, The Park, Carrickmines, Dublin 18



**NetShare Ireland**  
The Future of Mobile Networks

## Lorraine Meehan

---

**From:** Sabine Browne [mailto:Sabine.Browne@waterwaysireland.org]  
**Sent:** 04 April 2019 14:49  
**To:** Lorraine Meehan <lmeehan@mkoireland.ie>  
**Subject:** RE: 180511 Croagh Wind Farm EIA - Scoping follow-up

Thanks for this Lorraine.

Waterways Ireland is the North/South Implementation Body for the inland navigable waterway systems of Ireland and was established under the British-Irish Agreement, 1999. The statutory remit of Waterways Ireland is to manage, maintain, develop and restore the inland navigable waterways, principally for recreational purposes.

The inland waterways under our remit are: the Grand Canal, the Royal Canal, the Barrow Navigation, the Shannon Navigation (Closest to the project – over 5 km away), the Shannon Erne Waterway, the Erne System and the Lower Bann Navigation.

Waterways Ireland has no comment in relation to the Croagh Wind Farm EIA as the project is outside its jurisdiction.

Kind regards,

**Sabine Browne**

*Clerical Officer - Environment & Heritage*

Waterways Ireland Western Regional Office  
Dock Road, Drewsborough,  
Scarriff, Co. Clare  
V94 H7N1

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## **APPENDIX 2-2**

### **COMMUNITY REPORT**

# Community Report

Croagh Wind Farm

Co. Leitrim & Sligo

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## 1 INTRODUCTION

Coillte Cuideachta Ghníomhaíochta Ainmnithe (Coillte) is seeking planning permission from Leitrim County Council and Sligo County Council to construct and operate a commercially viable wind farm project on lands at Croagh, near Drumkeeran in Co. Leitrim and Co. Sligo.

From the project outset, Coillte consulted with the local community and commenced this engagement prior to the start of the project design and environmental assessment with the objective being to ensure that the views and concerns of all members of the local community were considered as part of the project design and the Environmental Impact Assessment process.

In relation to national guidance on community engagement and consultation for wind energy developments, the *Wind Energy Development Guidelines* (Department of Environment, Heritage and Local Government, 2006) state that:

*“While it is not a mandatory requirement, it is strongly recommended that developers of a wind energy project should engage in active consultation and dialogue with the local community at an early stage in the planning process, ideally prior to submitting a planning application”.*

This was further addressed in the *Preferred Draft Approach to Wind Energy Development in Ireland* (June 2017) which stated the following with respect to planning applications for wind farms:

*“Planning applications must contain a Community Report prepared by the applicant which will specify how the final proposal reflects community consultation. The Community Report must also outline steps taken to ensure that the proposed development will be of enduring economic benefit to the communities concerned”.*

The *Draft Revised Wind Energy Guidelines* (Department of Housing, Planning and Local Government, 2019) has retained this position stating the following:

*“In order to promote the observance of best practice, planning authorities should require applicants to prepare and submit a Community Report with their planning application and a condition on any subsequent planning permission should require developers to carry out the development in accordance with the approved Community Report”.*

This Community Report outlines Coillte’s engagement and liaison with the community local to the Croagh area and the proposed wind farm.

## 2 BACKGROUND

Coillte has a long history of working with communities and our experience around the country has generated an inherent understanding of the communities in which we operate. We aspire to work **with** the communities surrounding our energy sites and wish to build projects that are good for us as a commercial company, good for our neighbours, and that contribute to the fulfilment of national and global Climate Change objectives.

Coillte has developed four wind farms in Ireland over the past decade and has learnt many valuable lessons in relation to working with local communities and the importance of including local people in

decisions that affect them. In 2017, the Renewable Energy Team undertook a review of our Community Engagement process and embarked on the design of a radically enhanced approach with the support of AstonEco Management.

The key elements of this approach, referred to as our 'Fair Play' model are:

- Detailed and systematic engagement with all close neighbours to the project (within 2 km) from a very early stage of project design.
- Open, transparent dialogue and communications.
- Creating opportunities for open, two-way dialogue on key issues.
- Involvement of the local community at all stages of the project design process.
- Empowering local communities to be part of project discussions that affect them.
- Ensuring that the local community have access to all relevant information as soon as it is available, in an understandable format.

The approach emphasises a focus on the residents of dwellings within 2 km of the initial site boundary as these people will be closest to the development and will therefore be most sensitive to any potential effects caused by the development. In the past, engagement has commenced when the project is almost fully designed and being prepared for planning submission. In our 'Fair Play' approach we start engagement as soon as a site has been identified as suitable for detailed environmental studies within the Coillte internal screening process. The approach also recognises the need to keep people further away from the development informed about the project as details become more defined.

In order to build better projects we have recognised the imperative of enabling meaningful engagement between the project team and the local residents. This engagement has to pass beyond just information provision, and through open, transparent dialogue and the involvement of people in decisions that affect them, move towards a more collaborative approach to infrastructure design that has a National interest but a local impact.

*What are our external drivers for Stakeholder Engagement?*

- Actively engaging in the conversation helps raise awareness and provides insight that can ensure successful project outcomes for everyone.
- Active and open dialogue with our community stakeholders is essential for the success of our projects. It is through two-way dialogue that Coillte Renewable Energy can responsibly partner with local communities.
- Coillte Renewable Energy is committed to strengthening partnerships with local communities.
- Public support is achieved by actively working with communities towards mutually desirable goals. Meaningful communication with stakeholders creates trust and mutual respect, as well as a shared understanding and vision of what a successful project can look like.

- Timely, proactive, open and honest communication is a cornerstone of our Engagement Charter. This approach helps to minimise possible adverse impacts on our neighbours and instead helps to achieve positive social, economic and environmental outcomes.
- In line with national policy, Coillte Renewable Energy are committed to meaningful consultation, which brings about constructive local dialogue, as well as mutual trust and understanding.

### 3 COILLTE RESOURCES

In order to implement this 'Fair Play' approach Coillte have resourced this project with a number of dedicated staff from the outset. The following key personnel have been involved in Community Engagement on the Croagh Project from within Coillte:

**Ciaran Mc Gill**, a native of Sligo, is our Project Manager. A qualified Civil Engineer, Ciaran has worked for Coillte for nineteen years covering projects in both forest roads design and construction, as well as wind energy projects throughout the full process from concept design, through planning and onto construction.

**Andy Fox** is our Community Engagement Manager. Andy has spent the past 15 years working hand in hand with communities to drive towards sustainable local development. Andy leads a team of three and has full responsibility for the development and implementation of Coillte's Community Engagement Strategy and Policy, with a focus on enhancing social acceptance across Coillte Renewable Energy's portfolio of development projects.

**Eamonn Keavney** is our Community Liaison Officer. Eamonn has worked with Coillte in all aspects of forestry during a forty year tenure. He has vast experience of forestry and comes with a deep understanding of both the local community and the needs of the local area.

**Carol Ryan** is our Communications Manager. Carol has worked with Coillte since 2001 across various business units in communications and project management roles. She looks after communications across our suite of renewable energy projects.

**Tom Costello** has worked as a Forest manager for Coillte for over 30 years. Tom has recently been involved in Community Liaison work on various projects across the Coillte portfolio. He has extensive experience on community engagement and the implementation of Community Benefit Funds, Near Neighbour Schemes and Energy Efficiency Schemes. Tom has also been involved in all aspects of forestry and community engagement during his thirty five year service with Coillte.

**Lorraine Meehan**, is our consultant, McCarthy Keville O'Sullivan Ltd's (MKO) Project Manager. Lorraine Meehan is a Senior Environmental Scientist with over 13 years of experience who has worked with MKO since 2007. Lorraine has gained extensive experience, working primarily as an Environmental Scientist and Project Manager on a wide range of projects and plans requiring environmental assessment. Lorraine's key strengths and responsibilities relate to the efficient and effective management of projects, including coordination of multidisciplinary project teams, engagement with the relevant authorities, stakeholders and members of the public on proposed and ongoing projects, organisation of extensive scoping and consultation exercises, and coordination and production of final project outputs, including Environmental Impact Statements/Environmental Impact Assessment Reports, Strategic Environmental Assessment Environmental Reports, and Constraints & Feasibility and Site Selection Studies.

A major focus of the engagement approach has been to make the technical design team more accessible to local people. At various stages of the project the following specialists from MKO and their sub-contractors together with Coillte have engaged with local individuals and groups on topics including the following;

- Noise
- Visuals
- Ecology & Biodiversity, Birds
- Archaeology & Cultural Heritage
- Engineering layout & design
- Statutory & non-statutory consultation, including circulation of the scoping report and invitation for feedback, the proposed consultee list which was amended to add some tourism groups suggested by our neighbours. Feedback on all responses received together with preplanning meeting feedback was given at the larger group meetings.
- Community Benefit
- Recreation and Amenity

## **4 SUMMARY OF COMMUNITY ENGAGEMENT CARRIED OUT**

### **4.1 INITIAL STAGE ENGAGEMENT**

Engagement commenced in June 2018 with the appointment of Eamonn Keavney as the CLO for the proposed project. Eamonn, having worked and resided within the wider local area over a 40 year career was ideally placed to lead the engagement process with the near neighbours.

As outlined above, Coillte emphasises a focus on the residents of dwellings within 2 km of the site as these people will be closest to the development and will be most sensitive to any potential effects caused by the proposed development. In commencing the engagement, we needed to identify the 2 km zone to commence within. This was achieved through a twofold exercise;

- a) Firstly, for the surrounding area, identification of all dwellings, lived in, vacant and with the potential to be occupied, mapping of all and establishment of a 750m buffer in which potential turbines would not be sited;
- b) followed with the site itself, identification and collation of all known constraints within the proposed site and surrounding area, including streams, statutorily designated sites, recorded archaeological sites and monuments telecommunications links etc;
- c) The combination of both sets of buffers was then utilised to develop a non-constrained area for investigation which was potentially suitable for turbine siting. An initial turbine layout was developed of ten potential turbines.
- d) These ten locations were then buffered by 2 km to allow the 2 km area to be identified. Engagement then commenced with all houses within the 2 km area together with a number of houses located just outside the 2km area where neighbours indicated an interest in the proposed development.

The individual house engagement continued from June to date as thoughts and views from our neighbours were gathered. As part of this process, a low-call number and project email address were created to aid communication. All those who expressed an interest agreed to their inclusion in an email group for two-way traffic such as raising queries and receipt of answers in addition to facilitating updates and circulation of information to all parties. As the engagement continued, the list extended as other interested near neighbours, some from outside the 2 km area agreed to be added. For those who were unable to receive information digitally or preferred printed media, all information was circulated in print from the CLO, who was always available to answer any queries or bring concerns to the project team. Through the dual email and delivery approach, we were able to engage with all neighbours within the immediate zone and were very available for any queries.

### **4.2 GROUP MEETINGS**

Small group meetings commenced in September 2018.

A site visit for neighbours was carried out in early October 2018, which was well attended. A few neighbours who were unable to attend the main day had individual visits hosted by the CLO.

Larger group meetings commenced in January 2019, and continued regularly until August 2019. Attendance varied at these events, with high attendances at the start, but tailed off for the last couple of meetings. Minutes were taken and circulated for all the larger group meetings and were circulated for comments or additions. Our planning and environmental consultants, MKO, were present at the larger group meetings together with specialists for various aspects of the ongoing studies. The Coillte Engagement Manager, the project CLO and Project Manager were also in attendance. Agendas were circulated in advance of meetings and after the first couple of meetings, in response to wishes raised, an update of the studies including the engineering layout and design was circulated in advance so that people had time to consider the updates and ask questions or raise issues accordingly. All meetings included time for questions and answers.

The larger group meetings coincided with the main environmental studies and statutory consultation process for the proposed project, with the proposed turbine layout fixed in June 2019. Post this layout fix, only minor alterations of the order of 20m were envisaged.

Due to low attendance at the last two larger group meetings, we reassessed our approach, in order that we were available and responsive to the near neighbours in a format that was as time efficient for our neighbours as possible. Feedback received also commented that the meetings were becoming repetitive and that the same people were asking the same questions at each meeting. Therefore we considered modifying our approach in that we would revert to individual engagements to explain the design and address any queries, which we emailed or delivered to all our neighbours. No feedback suggested that our neighbours wished to continue the monthly meetings.

### **4.3 LAYOUT ITERATION**

Maps of the proposed development were circulated, with four significant iterations, the initial layout, the identification of two new locations to the south west for detailed consideration, the preferred layout outlining the two turbines to the north east were likely to be removed and the current layout map. Please refer to section 5 below for further details.

### **4.4 INDIVIDUAL ENGAGEMENT**

Individual engagement has continued since June 2018 and will continue into the future. All issues and queries are considered and feedback given. Information is also circulated in relation to related issues including notification of the issue of the Draft Wind Energy Guidelines for public consultation in December 2019 and how to input feedback within this consultation process.

### **4.5 WORKSHOPS**

A number of workshops have occurred on the project as detailed below. Workshop handout materials are included in Appendix C.

#### **4.5.1 Noise - AWN**

Two noise workshops occurred, the first informal session in January 2019 introduced the noise sub consultants, outlined the proposed background noise measurement campaign, agreed monitoring locations and answered any queries. One effect of this first noise workshop was to increase the number of noise monitors to ten locations (a site of this size would typically only have 6 measurement locations). The second noise workshop was held in July 2019 and was designed with input from the near neighbours. The purpose of this workshop was to give people an understanding of noise and the terminology, set out the background noise measurements captured, outline the design of the



proposed wind farm using the background noise measurements and address concerns such as low frequency sound, infrasound, amplitude modulation and post construction compliance methodologies. A further noise workshop outlining the predicted noise results at individual house level and any mitigations required as a clinic type (based on a cluster of 4-5 houses in a similar geographic area) was planned but did not occur, due primarily to lack of clarity on what noise guidelines would be in place at the time of the planning application. Our neighbours had a strong feeling that without the new guidelines being adopted, a session based on the 2006 guidelines would not be meaningful.

#### **4.5.2 Archaeology – MKO utilising materials from Tobar Archaeology & Ecology - MKO**

Project workshops with the near neighbours were held as outline above on the following topics;

Two workshop sessions were held on archaeology and cultural heritage and ecology and ornithology based on feedback during the meetings. These occurred in July and August 2019, when many of the studies were completed and gave attendees an insight into the area and what the studies had uncovered.

#### **4.5.3 Visual Impact - MKO**

Many of our neighbours wished to know what the proposed wind farm would look like for their homes. To address this, we included a number of sessions on landscape and visual impact in our monthly meetings. Photomontages and visibility maps were presented and explained. In addition, visualisation software called “Trueview” was utilised to represent what the development would look like from individual houses. “Trueview” involves the use of an iPad which can be held vertically and tracked around to superimpose proposed turbines into the actual terrain. Proposed turbines can be shown stationary and moving to give a representation of views around a house. All interested neighbours were visited, even those where turbines would not be visible. Following these site visits, indicative prints were delivered to all houses as a record of the day and to allow further perusal. We acknowledge that the photos in particular are not to photomontage standard but the visual representation was worthwhile to get an idea of what the development would look like on an individual basis.

#### **4.5.4 Property Values**

A further workshop was planned on property values in a wind farm area, however this didn't occur. The topic was discussed regularly during the larger group meetings, with evidence both proving and disproving an impact on property prices in an area due to wind farm development. The lack of quality Irish data, together with the very cyclical nature of the Irish property market, which would render any conclusions open to wide interpretation, resulted in the workshop not progressing.

### **4.6 NEWSLETTERS & BOOKLET**

Two newsletters were circulated at the early engagement stages in August 2018, to introduce our team and our project, to outline our inclusive approach, to answer some of the early queries we had received together with circulation of contact details for the team. These newsletters were circulated to all within the 2 km zone. The subsequent individual engagements, the small group and larger group meetings provided updates and information post the initial newsletters.

When the planning design of the proposed project and the studies were largely completed, we compiled the data into a 24 page booklet, which was circulated to all houses within 5 km of any

proposed turbine in December 2019. The information contained within this booklet, together with photomontages and constraints maps are all available in the project website, launched in December 2019.

#### **4.7 COVID-19**

The outbreak of the Covid-19 virus resulted in protective restrictions to reduce the spread and impact of Covid-19 within our communities, which has impacted on planned engagements since restrictions came into force. However we remain committed to keeping our neighbours informed about the progress of the project as we continue to work towards a planning application.

As we continue to work in accordance with protective measures outlined by the HSE and Government, our commitment to keeping in contact is as important as ever, and we have been engaging through individual phone calls, group emails, texts and via posting all our updates for this project on the project website. We remain contactable through phone, text, email and by post if needs be.

The restrictions have impacted on our commitment to further workshop / individual house sessions planned when the EIAR, planning application and supporting documentation are compiled and ready for submission of a planning application. At these sessions, it was envisioned that the project team will visit individuals or groups, depending on their preference, to go through the complete set of documents, show people what is included and answer any queries, in hopefully a useful session to allow our neighbours to better understand the planning application, its various constituents and its format to facilitate any observations on the application. As the planning application will be submitted during the Covid restrictions, house visits will not be possible, but we still be available to go through the proposed documentation and answer any queries by phone or email.

#### **4.8 PROJECT WEBSITE**

The website went live on 19<sup>th</sup> December 2019.

The full suite of planning application documents will be made available to all our neighbours via our project website. Follow up sessions with neighbours will be carried out as requested.

#### **4.9 CONSULTATION THEMES**

The main themes captured during the course of the consultation included;

- The engagement process itself and how best to encourage all parties to maximise the benefit from it. A Proposed Engagement Plan or PEP was developed with the near neighbours throughout late 2018 and the first few months of 2019, which was deemed in good order for signing by all present who wished to in the April 2019 meeting. The PEP outlined the process which we all hoped to follow throughout engagement on the project. The PEP is appended to this Community Report and consisted of the following main sections;
  1. The Goal of the document
  2. Ground Rules for engagement
  3. What are the steps to be taken with the local neighbours by Coillte?
  4. What are the local neighbour's concerns?

## 5. The 7 zone model

- The environmental impact assessment used to enable transparent engagement
- Noise identified by all neighbours through multiple interactions as the major issue. Cumulative noise based on the noise issues felt by some neighbours from existing developments.
- Potential health effects from the turbines from noise, infrasound, low frequency sound and amplitude modulation. Are these fully understood? What evidence is there.
- What shadow flicker will there be from the development?
- The proposed size of the turbines relative to those already in situ locally and with reference to the wind energy guidelines dating from 2006. Does Leitrim already have its share of wind turbines? How many, how high and what type of turbines will be put in my neighbourhood (and exactly where)?
- The potential impact on tourism of the proposed development.
- Will the proposed development impact on the value of my property. Is there any evidence in an Irish context around this?
- What will the quality of life impact of this be on all neighbours?
- What are the impacts on water, plants, birds and animals?
- What are the impacts on climate and air quality?
- What are the impacts on local infrastructure and use of local roads?
- What are the impacts on mobile phone / mobile broadband / TV reception?
- What amount of energy and CO2 is involved in making the turbines?

These themes were discussed regularly throughout the engagement process, which we answered in a transparent and open manner and allowed healthy discussion around all areas. Ultimately not all themes could be or were addressed to the satisfaction of all our neighbours, but we remain open in trying to find fair and equitable solutions for all including sharing information sources at our disposal. The themes raised are also addressed in the relevant sections of the EIAR for the project.

### 4.10 SUMMARY TABLE

A summary of all engagements is included at Appendix A below and the main milestones are displayed schematically in Figure 1 below.

2018

2019

2020

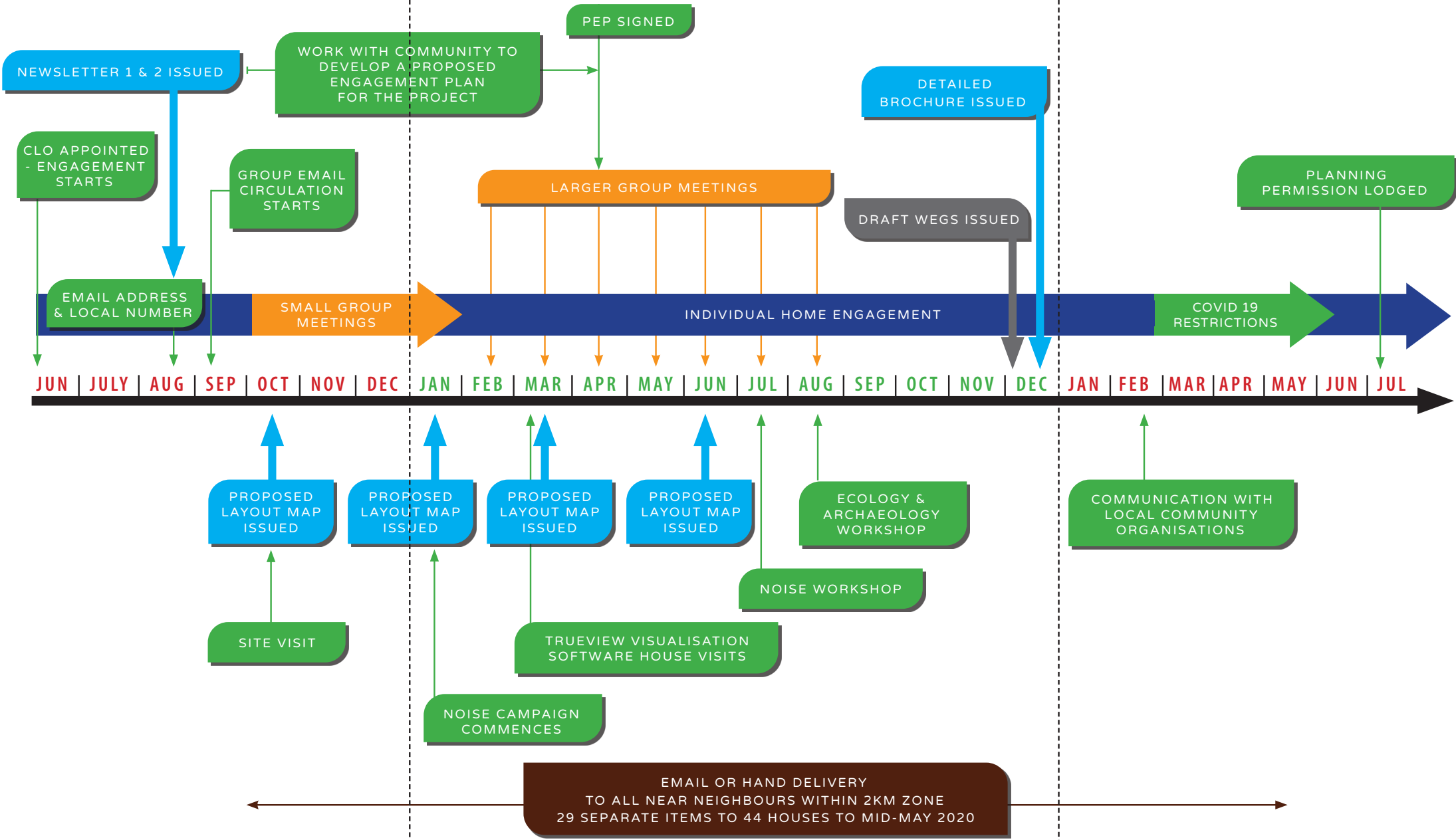


Figure 1

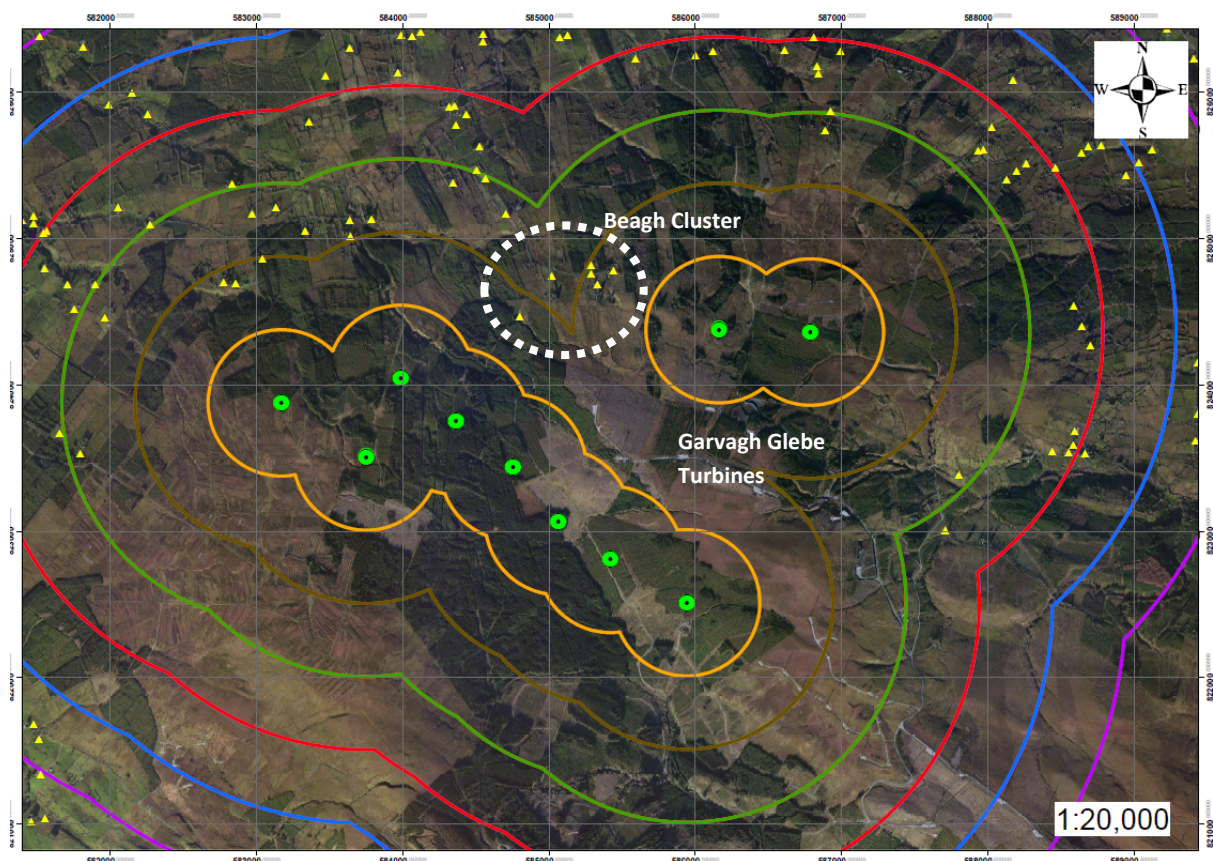
## 5 INFLUENCE OF ENGAGEMENT ON THE EVOLUTION OF THE WIND FARM DESIGN

As outlined in Section 4 above, the engagement process undertaken on the proposed project has given the project team a detailed appreciation of the issues and concerns of the near neighbours. This close working relationship has facilitated the evolution of the project design to understand and alleviate the concerns expressed as far as possible.

The mains concerns expressed together with their impact on the design evolution are set out below.

### 5.1 'WRAP-AROUND' EFFECT

A cluster of homes in Beagh townland are located just north of the existing Garvagh Glebe windfarm, the closest existing turbine being approximately 780m from the closest house in a southerly direction. The proposed Croagh layout would see proposed turbines located to the east and west of the Beagh house cluster, at distances of between 750 and 1,000m separation to the closest houses. Please see Figure 2 below.



**Figure 2** – Initial layout map showing Eircodes. The Beagh house cluster is circled with a white dashed line

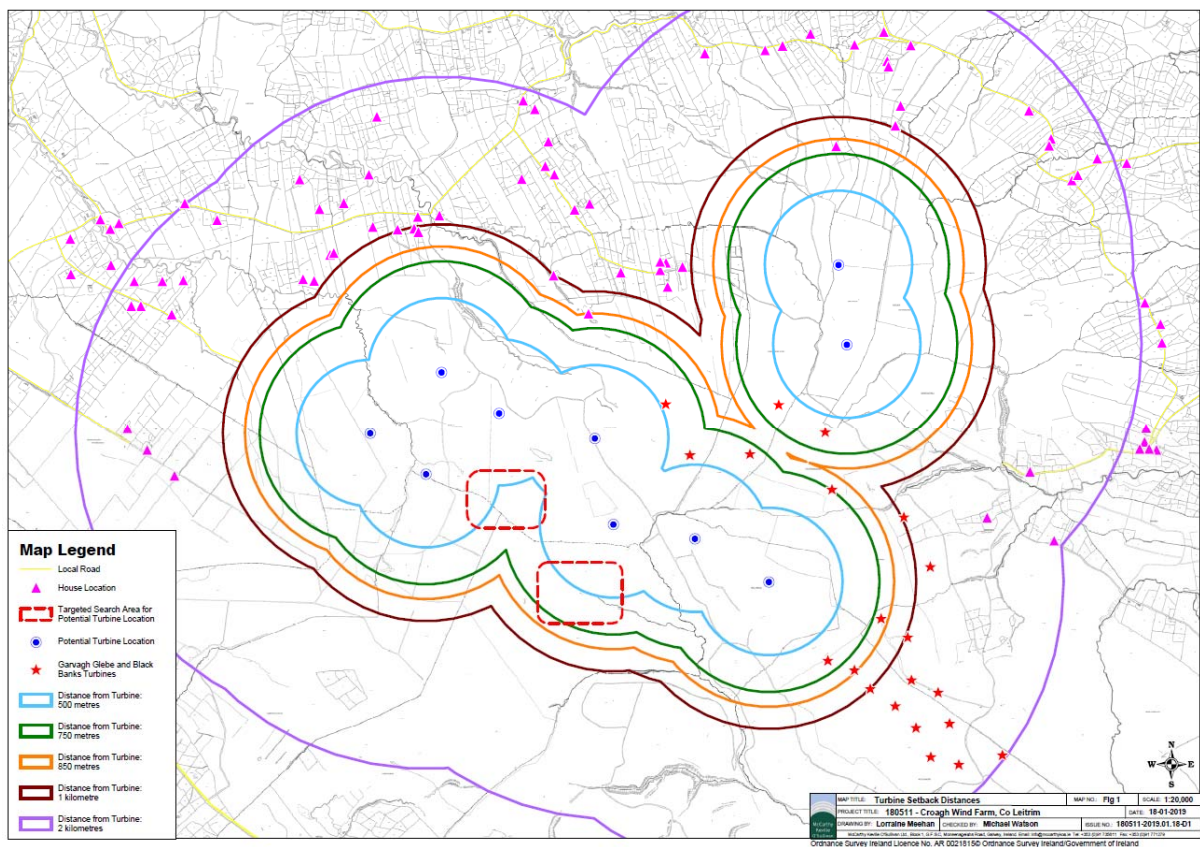
Neighbours raised concerns regarding noise emissions from the existing turbines when the wind blew from a southerly location, but that southerly winds were not the prevailing wind and so were intermittent. The initial Croagh layout as proposed would mean that a combination of existing and proposed turbines would form an angle of almost 180 degrees around these houses. In effect the near neighbours felt that turbines would have a 'wraparound effect' on their homes; turbines

would be east, west and south of them and that this could give rise to noise emissions for winds from all these directions which would be the majority of the time. Visually, turbines would partially surround their homes.

Although the main views from all homes in the cluster are predominantly north, with views of Lough Gill, Benbulbin etc. which would be uninterrupted by the proposed new locations, the design team recognised this concern and started to work with our neighbours to mitigate this affect.

The first iteration involved rotating the axis the two proposed turbines to the north east to a north/south orientation, which achieved a greater separation distance to homes on the eastern side but didn't improve the 'wraparound' impression. In addition, the site visit carried out at the time with neighbours allowed the design team to understand the issue.

The design team began looking at areas to the south east of the early turbine layout, to see if they were suitable for wind turbines, from a geotechnical, environmental and wind resource viewpoint. An added bonus of the area under consideration was the lack of neighbours to the southwest of the site. Figure 3 below indicates the area considered as two rectangular areas.

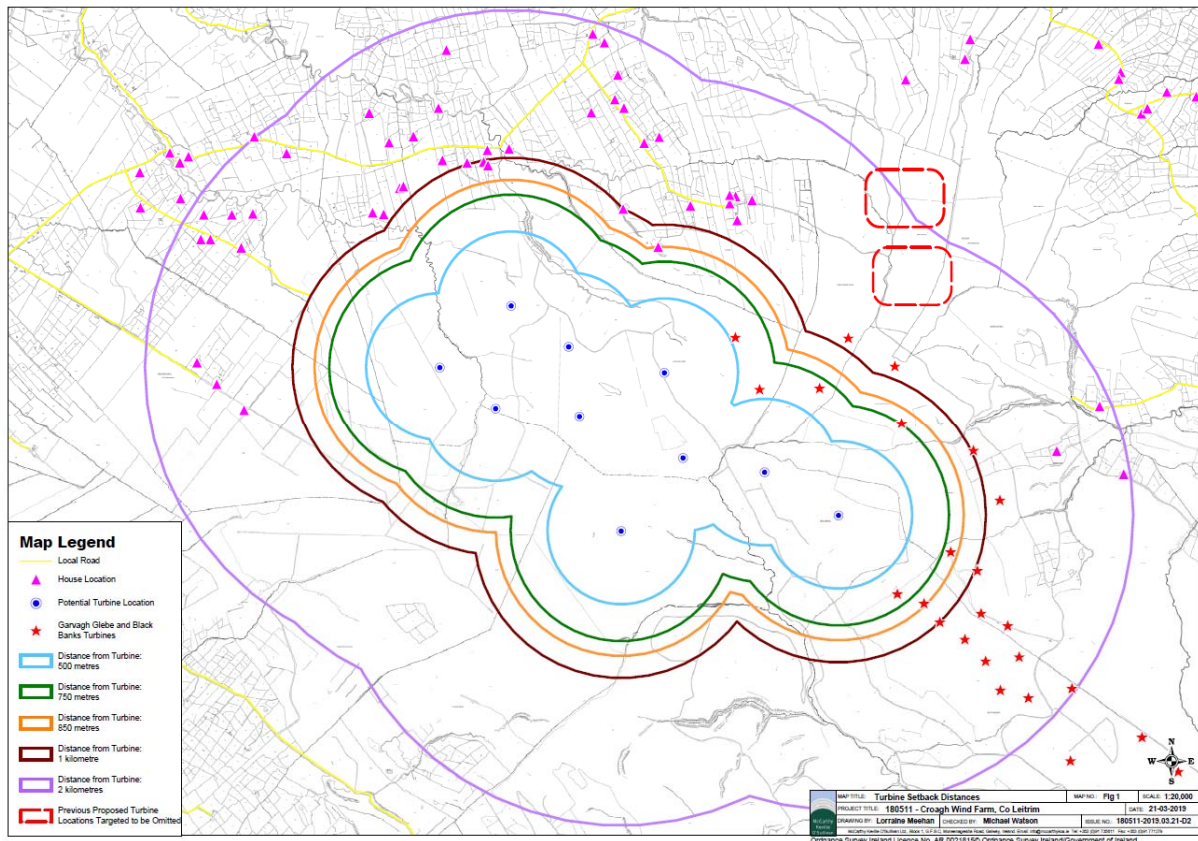


**Figure 3 – Evolving Layout**

The additional areas were included into the study area and over the course of a number of months studies, were deemed suitable for turbine siting. This stage of the design therefore identified that there were twelve potentially viable turbine sites.

From the earliest engagement the team had highlighted that Coillte were assessing a proposed ten turbine wind farm. As it had been verified that the two alternative locations were viable, Coillte were able to keep a proposed ten turbine layout, whilst also removing the wrap around effect to the Beagh house cluster. We fully briefed our neighbours and the layout evolutions together with the decision not to increase the proposed development size to a twelve turbine layout.

A map of the proposed ten turbine layout was shared and discussed at our June 2019 meeting, see Figure 4 below.



**Figure 4 – June 2019 Design Iteration.**

A further benefit of the evolved layout was that the number of properties within 2 km of a proposed turbine was reduced by 34.

## 5.2 PROXIMITY OF TURBINES TO DWELLINGS

In order to understand the number of residences in the area and to establish a buffer to properties, we started off with the Eircodes for the surrounding area. Notwithstanding the minimum 500m separation distance recommended in the 2006 Wind Energy Guidelines, Coillte utilised an initial 750m buffer to all Eircodes, when developing the initial developable area for the proposed turbine. In this way, the starting position was a minimum separation of 750m from any proposed turbine to any dwelling. The housing buffer and the environmental constraints were then utilised to develop our first proposed iteration of our 10 turbine layout.

Once the first iteration was developed, engagement started in June 2018. The following table details the number of Eircodes and their distance from any proposed turbines;

| Distance, m        | Count     | Total      |
|--------------------|-----------|------------|
| <1000              | 8         | 8          |
| 1500 - 2000        | 14        | 22         |
| 2000 - 2500        | 40        | 62         |
| 2500 - 3000        | 45        | 107        |
| <b>3000 - 3500</b> | <b>25</b> | <b>164</b> |

**Table 1** – Eircodes within radii of Proposed Turbines (Note; additional dwellings were identified which didn't have Eircodes)

Our engagement within the area identified a number of other residences which didn't have Eircodes, which were added, together with a few just beyond the 2 km separation area, where neighbours were interested in the proposed development. Our near neighbour engagement group therefore consisted of 76 house locations. Of these, 52 are currently occupied, with 15 currently empty and a further 9 in a very poor state of repair. 9 dwellings were located between 750m and 1000km away from a proposed turbine, with the closest house just over 750m from a turbine location.

Our engagement identified the following two main themes;

- As outlined above, the Beagh housing cluster potentially had turbines to the east and west of it as distances of between 750 to 1000m each side, and these neighbours relayed these concerns to us in our engagement.
- A number of other neighbours expressed wishes that if further separation could be achieved to their dwellings that it would be welcomed.

The subsequent studies which drove the layout evolution were mindful of the neighbours' concerns where the design team tried to maximise separation distances to occupied residences.

The evolution of the design through the various design iterations, has actually increased the distance from 34 of the 76 house locations to greater than 2 km from a proposed turbine, leaving 42 house locations within 2 km of a proposed turbine. Of these, there is one occupied house located within 1km of a proposed turbine, at a separation of 850m, all other occupied houses are a minimum of 1,050m from any turbine. The current layout has 28 occupied dwellings within 2 km of any proposed turbine. Table 3 below demonstrates this.

| Distance, m   | Original Layout                                |                           | Current layout                                 |                           |
|---------------|------------------------------------------------|---------------------------|------------------------------------------------|---------------------------|
|               | Total number of houses (occupied & unoccupied) | Number of occupied Houses | Total number of houses (occupied & unoccupied) | Number of occupied Houses |
| 0-1,000       | 11                                             | 10                        | 5                                              | 1                         |
| 1,000 – 2,000 | 13                                             | 41                        | 8                                              | 27                        |
| <b>Total</b>  | <b>75</b>                                      |                           | <b>41</b>                                      |                           |

**Table 2** – Comparison of the numbers of dwellings within 2km of the original and final layouts.



### 5.3 NOISE

The main concern identified from our engagement with the near neighbours was the impact of noise. The area is already well developed in terms of wind farm infrastructure, so residents are knowledgeable of wind farms, their construction and operation together with the effect of wind direction on noise propagation. The neighbours closest to existing wind farm developments also expressed issues with noise nuisance from existing turbines under certain wind directions.

Understanding the potential noise from the proposed development was therefore paramount for the design team.

- The first step here was taken at the earliest possible stage. The importance of noise and a robust background noise measurement campaign was clearly set out as a requirement when procuring consultants to deliver the project, and a specialist noise consultant with wide experience (AWN) formed part the appointed consultants team.
- The background noise measurement campaign was designed in consultation with the near neighbours including bringing the noise consultants to meet the neighbours in advance of the measurement campaign commencement. Existing noise issues together with sensitive noise locations were identified and a measurement campaign was undertaken at 9 separate locations picked by our neighbours (6 would be the normal number for a development of this size). The results of the campaign revealed that background noise levels in the area were quite low.
- The results of the background noise measurement campaign were shared with the near neighbours at a workshop, designed in consultation with the community, to provide a non-technical outline of the theory of wind turbine noise.
- The sound power levels from the proposed turbine is required to identify predicted noise levels at various wind speeds and directions. The Croagh scheme was designed with reference to modern turbine technology which has seen the evolution of much quieter turbines over existing, older wind turbine models. The newer turbines are larger yet more efficient than older models and are much quieter on a per MW basis. The starting point of the layout was therefore to maximise the potential of the site, in tandem with the lowest possible potential for noise impacts.
- All dwellings were utilised for development of the predicted noise levels, and mitigation strategies were developed as required to comply with the guidance.
- Added to this is the fact that distance from a wind turbine is the most effective design phase method of mitigation of noise impacts. 2km is widely regarded as a rule of thumb distance where noise impacts reduce to close to background levels.
- The layout evolution as described in Section 5.2 above allowed the number of dwellings with 2km to be reduced by 45%, newer turbine technology resulted in the number of point sources of noise to be much reduced by using a smaller number of larger turbines. The net result of this is that the proposed development is designed to be as quiet as possible and therefore to have as little potential for noise issues to arise.
- Added to this the scheme proposes regular operational noise monitoring, together with a clear and simple issue capture system to ensure that the operational wind farm is in full compliance with planning conditions.

Therefore, in engagement with our neighbours, we recognised the existence of wind farm noise in area already, we designed the layout to maximise separation distance from proposed turbines

to minimise any impacts. We also utilised our engagement to increase neighbours understanding of noise and noise measurement to help alleviate concerns.

#### 5.4 VISUAL IMPACT

There were two main concerns identified by near neighbours in relation to visual impacts from the proposed development;

- The proposed turbines were larger than those in existence in the area, the proposed turbines would overshadow houses and would not be in keeping with existing wind farms.
- The Beagh house cluster would be visually surrounded by turbines

The initial layout had two turbines located to the north east somewhat separate to the main cluster. This had the potential to create a disjointed effect of two clusters, and impacted the Beagh houses in particular. Through the design evolution, the two separate turbines were removed, resulting in a much more visually coherent single cluster with greater separation to existing homes and appeared less disjointed from a very local perspective.

Early photomontages were developed and discussed with the near neighbours through a series of engagements, showing a representation of the scheme for neighbours to see and understand potential impacts. These are included in Appendix B.

In response to queries from our neighbours in relation what the proposed scheme would look like from individual homes, particularly as the tip heights were taller than those of existing wind turbines in the area, visualisation software called “Trueview” was utilised to represent what the development would look like from individual houses. All interested neighbours were visited, even those where turbines would not be visible. Indicative prints were delivered to all houses following the site visits as a record of the day and to allow further perusal. In this way we were able to demonstrate what the proposed development would look like, and take screening and lower visibility areas into account. The exercise also demonstrated how the proposed new turbines blend in with the existing turbines. These indicative prints are included in Appendix E.

In addition to the above, a detailed visual impact assessment supported by photomontages and screening assessments was completed for the proposed wind farm layout to mitigate the potential for visual impact.

In this way the proposed wind farm was designed to minimise the visual impact on local dwellings and roads in addition to the wider area.

#### 5.5 TOURISM

Some of the near neighbours are involved in the tourism business, so the impact of the proposed wind farm on tourism in the wider area was raised as a concern.

The design was cognisant of these concerns and the layout was designed to mitigate any impacts including;

Photomontages are presented in the Landscape & Visual Chapter of the EIAR from a wide variety of locations surrounding the site. These were selected based on consultation with our near neighbours, other stakeholders and from a scenic view impact assessment. Views from Lough Gill, Killerry, Carrowkeel and other tourist attractions were visited and assessed for impacts.

The proposed wind farm was scoped with Fáilte Ireland and their response was taken on board in the design.

The proposed wind farm was scoped with local tourist organisations, identified by our neighbours, but no response was received from these bodies.

All surrounding historical sites were visited by our archaeologists and visuals team to identify any impacts on setting and mitigate accordingly.

In this way the proposed development has been designed to work with existing wind farms and the tourism potential of the area.

## 6 COMMUNITY ENGAGEMENT IN THE WIDER AREA

Figure 5 below shows the proposed project relative to local communities and settlements and outlines the area within 10 km of the proposed farm.



**Figure 5 – Map outlining a 10km distance form proposed turbines**

A list of all community groups within 10km of the proposed site was compiled throughout January & February 2020 with approximately 70 community groups identified in the area within the 10 km radius. All of these were contacted via post or email on 19<sup>th</sup> February 2020 with details on the proposed project, via the project brochure, and invited to be included on the stakeholder list for the project and to raise any queries or issues. Appendix D includes a list of these organisations. The project team will continue to build relationships with these groups.

## **7 ONGOING LIAISON AND CONTACT**

A number of different phases have been detailed below with differing levels of engagement anticipated depending on the levels of project activity. Underpinning all of the engagement below will be a dedicated Community Liaison Officer for the project who is contactable by email and phone. These details will remain on the project website which will be in place for the duration of the project. As the project progresses, regular updates will be posted to this website.

### **Post Planning submission until 6 months pre-construction**

During this period (12 -24 months) a number of key community related activities will continue to be progressed. The first is a participatory design process for the Croagh Community Benefit Fund (CBF). Approximately 2 months after the project has been submitted into the planning system the team will start a process of reaching out initially to residents within the 2km zone and then slightly further afield, in order to bring together a small group of people who are interested in working on the design and structure of a community based entity that would ultimately run this Community Benefit Fund. This process will start with a scoping exercise followed by a series of facilitated workshops. It is hoped that representatives involved in existing local development initiatives will be stakeholders in this process and will therefore contribute to this strategy.

The second piece of work is to explore the potential for Community Investment in the project as outlined in the new Renewable Energy Support Scheme (RESS). This will probably follow on from the CBF work stream and will look at the best ways to promote awareness about this opportunity in advance of it coming online.

### **Pre- Construction and Construction phase**

6 months prior to the commencement of construction on the project we will initiate the set-up of a liaison group. The project will meet with this group on a monthly basis to prepare for the construction phase and monitor activities during construction. This group will develop plans on communicating effectively with residents directly impacted by construction activities and deliveries, especially traffic planning to minimise disruption.

The project will also engage with local suppliers prior to the construction phase in order to outline the projects future needs and promote the use of local suppliers and service providers wherever possible. This may take the form of a “meet the buyer” event.

### **Operational Phase**

The project will continue with a proposed annual meeting with the liaison group to update the group on project performance and address any issues identified. The Community Liaison Officer will also be available throughout this period to directly address any issues raised by local residents. As stated above, the project website will also be maintained as a method of providing regular, up to date information on the project.

## **Decommissioning Phase**

A year prior to the commencement of decommissioning of the project, the project team will engage with the established liaison group as well as all residents within the 2km zone to outline the decommissioning plan and address any issues identified at that time.

In line with the Governments Code of Practice 2016 (XX) the project will publish an annual report of all engagement activities on the project website.

## **8 POTENTIAL ENDURING BENEFITS OF THIS PROJECT**

Croagh Wind Farm has the potential to bring significant positive benefit to the local community. The project will create sustainable local employment, it will contribute annual rates to the local authority and it will provide opportunity for local community investment in the project in line with the new Renewable Energy Support Scheme. As with all wind farm projects which Coillte develop, a community benefit fund will be put in place for the lifetime of the project to provide direct funding to those areas surrounding the project.

### **8.1 COMMUNITY BENEFIT FUND**

Two important areas of Government policy development are nearing completion which will have a bearing on the establishment of future community benefit funds, the updated Wind Energy Guidelines and the Renewable Energy Support Scheme (RESS). Both sets of policy are expected to be finalised during Q2/Q3 2020 which will provide the Government requirements on future community benefit funds for renewable energy projects. We will fully take into account these two important policies as we present the Coillte approach to community benefit.

Coillte expects that for each megawatt hour (MWh) of electricity produced by the wind farm, the project will contribute €2 into a community fund for the RESS period i.e. first 15 years of operation and €1 per MWh for the remaining lifetime of the wind farm.

If this project is constructed as currently designed we estimate that a total of approximately 5 million euro will be available in the local area for community funding over the lifetime of the project. The above figure is indicative only and will be dependent on the generation capacity of the wind farm which is influenced by a number of factors including:

1. Number of wind turbines.
2. Capacity and availability of energy production of those turbines.
3. Quantity of wind.

### **How the fund will be used and administered?**

The Community Benefit Fund belongs to the local community. The premise of the fund is that it should be used to bring about significant, positive change in the local area. To make this happen, our first task will be to form a benefit fund development working group that clearly represents both the close neighbours to the project as well as nearby communities. This group will then work on designing the governance and structure of a community entity that would administer the Community Benefit Fund. We aim to commence this work in summer 2020.

## **8.2 COMMUNITY INVESTMENT OPPORTUNITY**

### **What is meant by Community Investment?**

The proposed Renewable Energy Support Scheme (RESS) sets out that future renewable energy project proposals enable the possibility for local communities to invest in projects in a meaningful way as a means to directly gain from the financial dividends that a project can provide should it be consented, built and operated. In response to this, Coillte have been working hard with external agencies to develop workable models of Community Investment. As with the benefit fund, we aim to take this work into the community during 2020, to continue to explore this exciting possibility and see how best to embed its design within the community.

## **8.3 EMPLOYMENT OPPORTUNITIES**

It is estimated that the proposed project will create approximately 80-100 jobs during the construction phase and 2-3 jobs during the operational and maintenance phases of the proposed development. During construction, additional employment will be created in the region through the supply of services and materials to the development. In addition to this, there will also be income generated by local employment from the purchase of local services i.e. travel and lodgings.

## **8.4 RECREATION**

There are number of features which the proposed project has the ability to unlock under a recreation opportunity. The timing of the project is beneficial as many of the areas of mature conifer plantation within the site have been clear-felled over the past few years which have unlocked some hidden gems including;

- Lough Nacroagh situated in the middle of the site
- Scenic views from the site particularly to the north
- Streams within the site

It is proposed to develop some recreational walks as part of the development of the project. These proposed walks will utilise existing forest tracks, new wind farm roads and trails, a boardwalk area together with a picnic area adjacent to Croagh lough, and viewing / seating areas. In addition, areas will be targeted for planting with broadleaves and berried trees to create areas of interest for small birds and increase the biodiversity habitat of the area.

Please see Chapter 4 of the EIAR for more details.

The site is very well placed within the wider recreational area with the existing Miners Way very close to the site. Coillte is already active in this area with Sligo & Leitrim County Councils and we propose that the project support the development of the wider area which could be uncovered as part of a wider regional strategy.

## 9 CONCLUSION / COMMITMENT

As outlined throughout this Community Report, there has been very active engagement on the project throughout the planning design phase to date. Many of our neighbours are supportive of the project, while others wish that the project doesn't proceed. We have achieved much in terms of making the proposed project a better project for all through our engagement, however we did not progress to a point where a full stakeholder group was formed and already working on the Community Benefit Fund and Community Investment work-streams. We fully recognise however that development of a proposed wind farm is a long and complex process and that there is ample time to jointly develop our community offerings with our near neighbours and other stakeholders, and we will be progressing these throughout the planning adjudication and decision phases as well as in the pre-construction phase should the project receive planning consent.

It is Coillte's intention to adhere to this community report for the lifetime of the development, in compliance with the Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement issued by the Department of Communications, Climate Action and Environment (December 2016) or updated revision.

## **Appendix A – Engagement Completed Record**





| Date       | Engagement (Describe) | Small group Meetings (Attendees) | Larger Group Meetings (Attendees) | Emails                                                                                                                                                                                            | Workshops                               | Site Visits | Layout Map circulated                                                                       | Meeting Summary                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------|-----------------------|----------------------------------|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|-------------|---------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01/11/2018 |                       | 7                                |                                   |                                                                                                                                                                                                   |                                         |             |                                                                                             | Introduction of all parties, neighbours, Coillte & consultants. Proposed engagement strategy, separation distance to homes, turbine size, health, noise, existing turbines, bats, traffic management, community WF, timelines of studies, Proposed engagement Plan (PEP) introduced, near neighbours to form a local group for engagement. Noise was agreed by all to be the single largest issue to be tackled.     |
| 09/11/2018 |                       |                                  |                                   | Minutes Issue. Email to circulation list. Delivery to all others within near neighbour zone.                                                                                                      |                                         |             |                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 28/11/2018 |                       | 2                                |                                   |                                                                                                                                                                                                   |                                         |             |                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 03/12/2018 |                       |                                  |                                   | Proposed Scoping consultee list shared with all near neighbours. EIAR study timeline issued to all near neighbours. Email to circulation list. Delivery to all others within near neighbour zone. |                                         |             |                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 11/12/2018 |                       |                                  |                                   | Email to Beagh house cluster in relation to noise monitor location and explaining what's measured. Delivery to all others who accepted a noise monitor.                                           |                                         |             |                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 08/01/2019 |                       |                                  |                                   | Formal Notification of decision by Beagh Residents to engage with Coillte & Coillte response.                                                                                                     |                                         |             |                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 21/01/2019 |                       | 4                                |                                   |                                                                                                                                                                                                   | Noise AWN - locating the noise monitors |             | Layout on 5000 scale background, original 10 WTG plus study area for 2 additional locations | EIAR studies update, scoping responses received to date, grid connection, preplanning meetings proposed, early stage photomontages presented and left for perusal, discussion on trueview visualisation software, Noise (AWN sub consultant in attendance for this session); monitoring campaign, monitor locations, predictions, how existing noise is modelled, shadow flicker, update on engagement process, Q&A. |
| 21/01/2019 |                       | 9                                |                                   |                                                                                                                                                                                                   | Noise AWN - locating the noise monitors |             |                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                      |

| Date                    | Engagement (Describe)                                                               | Small group Meetings (Attendees) | Larger Group Meetings (Attendees) | Emails                                                                                                                                                                                                                | Workshops | Site Visits | Layout Map circulated                                                                                           | Meeting Summary                                                                                                                                                                        |
|-------------------------|-------------------------------------------------------------------------------------|----------------------------------|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-------------|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 21/01/2019 & 24/01/2019 | Erection of noise monitors at dwellings. Liaison with residents as part of process. |                                  |                                   |                                                                                                                                                                                                                       |           |             |                                                                                                                 |                                                                                                                                                                                        |
| 18/02/2019              |                                                                                     |                                  |                                   | Email Enclosing the EIAR scoping document and the draft PEP. Answering queries arising from 21/01/19 meeting. Email to circulation list. Delivery to all others within near neighbour zone.                           |           |             |                                                                                                                 |                                                                                                                                                                                        |
| 20/02/2019              |                                                                                     |                                  |                                   | Confirmation of meeting issued to circulation list.                                                                                                                                                                   |           |             |                                                                                                                 |                                                                                                                                                                                        |
| 21/02/2019              |                                                                                     |                                  | 16                                |                                                                                                                                                                                                                       |           |             |                                                                                                                 | PEP, EIAR studies update, potential for turbine relocation, Q&A covering noise, infrasound, Coillte long-term strategy, workshop design, WEGS, wider engagement outside the 2km zone.  |
| 06/03/2019              |                                                                                     |                                  |                                   | Email informing about the visualisation software visit to near neighbour houses. Site visits to all interested houses to allow them to "see" what the current layout iteration would look like for individual houses. |           |             |                                                                                                                 |                                                                                                                                                                                        |
| 13/03/2019              |                                                                                     |                                  |                                   | Minutes Issue. Email to circulation list. Delivery to all others within near neighbour zone.                                                                                                                          |           |             |                                                                                                                 |                                                                                                                                                                                        |
| 13/03/2013              |                                                                                     |                                  |                                   | Email inviting near neighbours to become involved in design of community workshops.                                                                                                                                   |           |             |                                                                                                                 |                                                                                                                                                                                        |
| 20/03/2019              |                                                                                     |                                  |                                   | Draft meeting agenda issued to circulation list.                                                                                                                                                                      |           |             |                                                                                                                 |                                                                                                                                                                                        |
| 21/03/2019              |                                                                                     |                                  | 9                                 | Map V3 circulated                                                                                                                                                                                                     |           |             | Layout Map on 5000 scale background, 2 turbines to NE potentially not proceeding, 10 WTG now in single cluster. | EIAR Studies update, potential to relocate 2 WTG to avoid 180 degree affect, turbine size, studies, number of dwellings, update on the noise campaign, update on the PEP process, Q&A. |

| Date                                            | Engagement (Describe) | Small group Meetings (Attendees) | Larger Group Meetings (Attendees) | Emails                                                                                                                                                           | Workshops                                                                                                                                                        | Site Visits | Layout Map circulated                             | Meeting Summary                                                                                                                                                                                                                                                                     |
|-------------------------------------------------|-----------------------|----------------------------------|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|---------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 24/03/19,<br>25/03/19,<br>09/04/19,<br>25/04/19 |                       |                                  |                                   |                                                                                                                                                                  | Site visits to all interested houses to allow them to "see" what the current layout iteration would look like for individual houses. Trueview software utilised. |             |                                                   |                                                                                                                                                                                                                                                                                     |
| 02/04/2019                                      |                       |                                  |                                   | Minutes Issue. Email to circulation list. Delivery to all others within near neighbour zone (4th & 5th April).                                                   |                                                                                                                                                                  |             |                                                   |                                                                                                                                                                                                                                                                                     |
| 17/04/2019                                      |                       |                                  |                                   | Meeting Agenda and Project Update Issue. Email to circulation list. Delivery to all others within near neighbour zone.                                           |                                                                                                                                                                  |             |                                                   |                                                                                                                                                                                                                                                                                     |
| 25/04/2019                                      |                       |                                  | 15                                |                                                                                                                                                                  |                                                                                                                                                                  |             |                                                   | EIAR studies update, Trueview software and its limitations and benefits, vibration and landslides, noise, existing noise, noise workshop design, community funds to benefit near neighbours - not all want a community fund, health, property values, PEP signed, fires, bats, Q&A. |
| 26/04/2019                                      |                       |                                  |                                   | Emails in relation to venue and rotating chair for future meetings.                                                                                              |                                                                                                                                                                  |             |                                                   |                                                                                                                                                                                                                                                                                     |
| 03/05/2019                                      |                       |                                  |                                   | Update on Met mast informing that it had been tampered with causing it's collapse. Email to circulation list. Delivery to all others within near neighbour zone. |                                                                                                                                                                  |             |                                                   |                                                                                                                                                                                                                                                                                     |
| 07/05/2019                                      |                       |                                  |                                   | Minutes Issue. Email to circulation list. Delivery to all others within near neighbour zone.                                                                     |                                                                                                                                                                  |             |                                                   |                                                                                                                                                                                                                                                                                     |
| 15/05/2019                                      |                       | 2                                |                                   |                                                                                                                                                                  |                                                                                                                                                                  |             |                                                   |                                                                                                                                                                                                                                                                                     |
| 07/06/2019                                      |                       |                                  |                                   | Meeting Agenda and Project Update Issue. Email to circulation list. Delivery to all others within near neighbour zone.                                           |                                                                                                                                                                  |             |                                                   |                                                                                                                                                                                                                                                                                     |
| 12/06/2019                                      |                       |                                  | 9                                 |                                                                                                                                                                  |                                                                                                                                                                  |             | 10 WTG in single cluster, 2 to NE not proceeding. | EIAR studies update, WEGS - tip height discussion in reference to the 2006 guidelines, Photomontages tabled and left for perusal, tourism, planning process, LCC preplanning meeting, noise - workshop design;                                                                      |