

No invasive species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011 were recorded within the site boundary during the site visit.

#### 2.3.1 Fauna in the Existing Environment

#### Birds

Records of birds seen and heard on the site of the proposed replacement lands were taken. Common passerines were recorded incidentally within the site. No birds listed on Annex I of the EU Birds Directive were recorded during the field survey. The site provided habitat for a range of common and widespread species but not of significance for rare or protected bird species, notably those associated with SPAs in the wider area. Given the lack of significant habitat for rare or protected bird species, there is no requirement for further bird surveys at the site.

#### Otter

A comprehensive search for otter was undertaken along a 10m riparian buffer of the stream adjacent to the southern site boundary (NRA, 2008 and Reid, et al 2013). No otter resting or breeding sites and no evidence of otter was recorded within the replacement lands, however, the watercourse along the site boundary is likely to be utilised by commuting and foraging otter.

#### Bats

There are no structures within the site which may provide suitable roosting habitat for bats. A large open landscape structure dominates the site and though linear features may be used by foraging and commuting bats, overall, the site is considered to have low suitability for bat species.

#### Other Terrestrial Mammals

No evidence of badger was recorded during the site visit and no other protected mammal species or evidence of such species were recorded within the site boundaries.

No faunal species listed under the Annexes of the Habitats Directive were recorded during the site visit.



# IDENTIFICATION OF RELEVANT EUROPEAN SITES

## Identification of the European Sites within the Likely Zone of Impact

The following methodology was used to establish which European Sites are within the Likely Zone of Impact of the proposed replacement lands:

- Initially the most up to date GIS spatial datasets for European designated sites and water catchments were downloaded from the NPWS website (www.npws.ie) and the EPA website (www.epa.ie) on the 24/06/2020. The datasets were utilized to identify European Sites which could feasibly be affected by the proposed replacement lands.
- All European Sites within a distance of 15km surrounding the replacement lands were identified and are shown on Figure 3.1. In addition, the potential for connectivity with European Sites at distances of greater than 15km from the proposed replacement lands was also considered in this initial assessment. In this case, no potential connectivity with sites located at a distance of over 15km from the proposed replacement lands was identified.
- > The catchment mapping was used to establish or discount potential hydrological connectivity between the site of the proposed replacement lands and any European Sites. The hydrological catchments are also shown in Figure 3.1.
- In relation to Special Protection Areas, in the absence of any specific European or Irish guidance in relation to such sites, the Scottish Natural Heritage (SNH) Guidance, 'Assessing Connectivity with Special Protection Areas (SPA)' (2016) was consulted. This document provides guidance in relation to the identification of connectivity between proposed replacement lands and Special Protection Areas. The guidance takes into consideration the distances species may travel beyond the boundary of their SPAs and provides information on dispersal and foraging ranges of bird species which are frequently encountered when considering plans and projects.
- Table 3.1, provides details of all relevant European Sites as identified in the preceding steps and assesses which are within the likely Zone of Impact. The assessment considers any likely direct or indirect impacts of the proposed replacement lands, both alone and in combination with other plans and projects, on European Sites by virtue of the following criteria: size and scale, land-take, distance from the European Site or key features of the site, resource requirements, emissions, excavation requirements, transportation requirements and duration of construction, operation and decommissioning were considered in this screening assessment
- > The site synopses and conservation objectives of these sites, as per the NPWS website (www.npws.ie), were consulted and reviewed at the time of preparing this report 24/06/2020. Figure 3.1 shows the location of the proposed replacement lands in relation to all European sites within 15km of the proposed replacement lands.
- Where potential pathways for Significant Effect are identified, the site is included within the Likely Zone of Impact and further assessment is required.

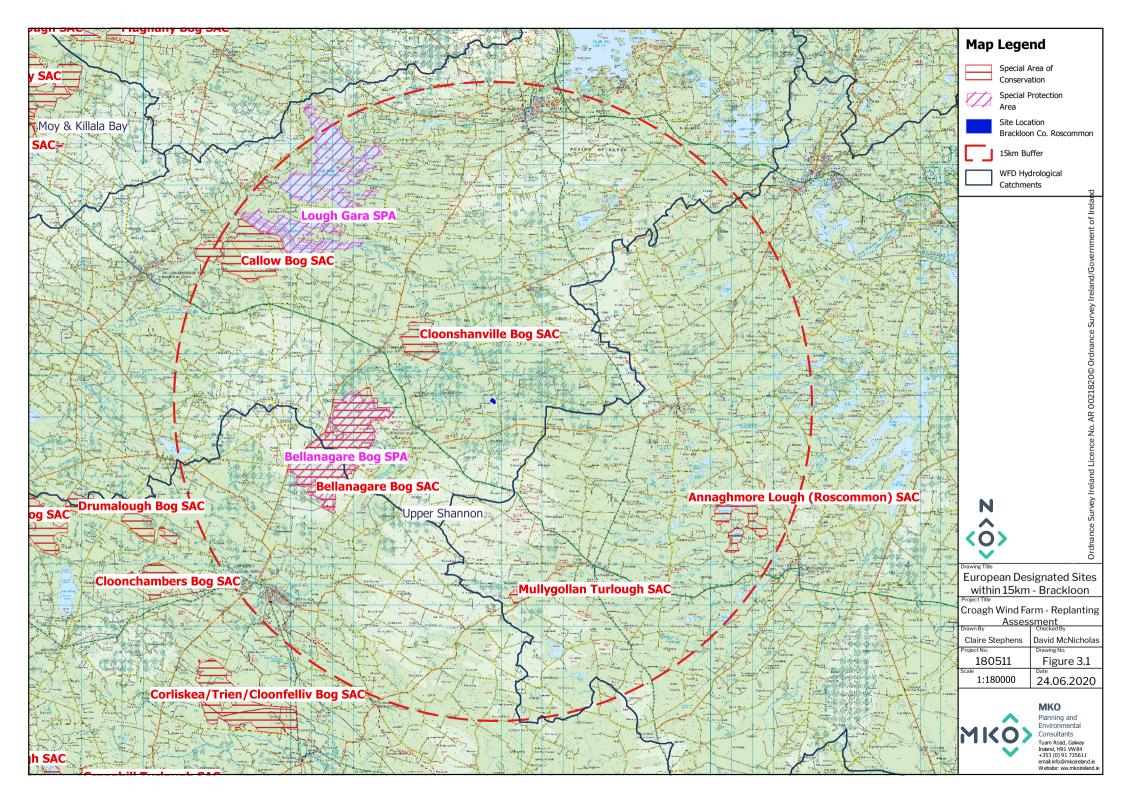




Table 3.1 Identification of Designated sites within the Likely Zone of Impact

European Sites and distance from proposed replacement lands	Qualify Interests/Special Conservation Interests for which the European site has been designated (Sourced from NPWS online Conservation Objectives, www.npws.ie on the 24/06/2020)	Conservation Objectives	Likely Zone of Impact Determination	Possibility of Significant Effects? (If Yes Progress To Stage 2 Of AA Process)
Special Areas of Con	servation (SAC)			
Cloonshanville Bog SAC (000614)  Distance: 3.3km  (4.1km hydrological distance)	<ul> <li>Active raised bogs [7110]</li> <li>Degraded raised bogs still capable of natural regeneration [7120]</li> <li>Depressions on peat substrates of the Rhynchosporion [7150]</li> <li>Bog woodland [91D0]</li> </ul>	Detailed conservation objectives for this site (Version 1, January 2016) were reviewed as part of the assessment and are available at www.npws.ie	There will be no direct effects as the project footprint is located entirely outside the designated site.  The proposed afforestation site has surface water connectivity >4.1km downstream with Cloonshanville Bog SAC via a stream, running adjacent along the southern boundary of the site. However, given distance downstream of the terrestrial habitats and nature and small scale of the works as permitted in the technical approval document there is no potential for indirect effects on the SAC.  No pathway for significant effect was identified and the site is not within the Likely Zone of Impact.	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.



European Sites and distance from proposed replacement lands	Qualify Interests/Special Conservation Interests for which the European site has been designated (Sourced from NPWS online Conservation Objectives, www.npws.ie on the 24/06/2020)	Conservation Objectives	Likely Zone of Impact Determination	Possibility of Significant Effects? (If Yes Progress To Stage 2 Of AA Process)
Bellanagare Bog SAC (000592)  Distance: 3.3km	<ul> <li>Active raised bogs [7110]</li> <li>Degraded raised bogs still capable of natural regeneration [7120]</li> <li>Depressions on peat substrates of the Rhynchosporion [7150]</li> </ul>	Detailed conservation objectives for this site (Version 1, November 2015) were reviewed as part of the assessment and are available at www.npws.ie	There will be no direct effects as the project footprint is located entirely outside the designated site.  No hydrological connectivity has been identified between the proposed afforestation site designated for terrestrial habitats and this European site. Due to the lack of connectivity between the small-scale replacement site and the European Site, no pathway for indirect effect between the proposal and the designated site exists.  No pathway for significant effect was identified and the site is not within the Likely Zone of Impact.	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.
Mullygollan Turlough SAC [000612] <b>Distance:</b> 3.4km	> Turloughs [3180]	Detailed conservation objectives for this site (Version 1, January 2018) were reviewed as part of the assessment and are available at www.npws.ie	There will be no direct effects as the project footprint is located entirely outside the designated site.	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.



European Sites and distance from proposed replacement lands	Qualify Interests/Special Conservation Interests for which the European site has been designated (Sourced from NPWS online Conservation Objectives, www.npws.ie on the 24/06/2020)	Conservation Objectives	Likely Zone of Impact Determination	Possibility of Significant Effects? (If Yes Progress To Stage 2 Of AA Process)
			Mullygollan Turlough SAC is located approximately 3.4km south-east of the proposed afforestation site and is buffered by agricultural, forestry, bog and scrub habitats. No hydrological connectivity exists between the proposed replacement lands and the designated site.  No pathway for significant effect was identified and the site is not within the Likely Zone of Impact.	
Callow Bog SAC (000595)  Distance: 3.6km	<ul> <li>Active raised bogs [7110]</li> <li>Degraded raised bogs still capable of natural regeneration [7120]</li> <li>Depressions on peat substrates of the Rhynchosporion [7150]</li> </ul>	Detailed conservation objectives for this site (Version 1, January 2016) were reviewed as part of the assessment and are available at www.npws.ie	There will be no direct effects as the project footprint is located entirely outside the designated site.  There is no hydrological connectivity between the proposed afforestation site and this European site designated for terrestrial habitats, located in a separate hydrological sub-catchment.  Therefore, no pathway for indirect	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.



European Sites and distance from proposed replacement lands	Qualify Interests/Special Conservation Interests for which the European site has been designated (Sourced from NPWS online Conservation Objectives, www.npws.ie on the 24/06/2020)	Conservation Objectives	Likely Zone of Impact Determination	Possibility of Significant Effects? (If Yes Progress To Stage 2 Of AA Process)
			effect between the proposal and the designated site exists.  No pathway for significant effect was identified and the site is not within the Likely Zone of Impact.	
Annaghmore Lough (Roscommon) SAC [001626]  Distance: 4.6km	<ul> <li>Alkaline fens [7230]</li> <li>Vertigo geyeri (Geyer's Whorl Snail) [1013]</li> </ul>	Detailed conservation objectives for this site (Version 1, January 2019) were reviewed as part of the assessment and are available at www.npws.ie	There will be no direct effects as the project footprint is located entirely outside the designated site.  This SAC is located in a separate hydrological catchment to the proposed small-scale afforestation works and there is no connectivity between the afforestation site and the SAC. Impacts on the listed Qualifying Interests can be ruled out due to the distance from the proposed works area and the absence of a complete source-pathway-receptor chain for impact.  No pathway for significant effect was identified and the site is not within the Likely Zone of Impact.	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.



European Sites and distance from proposed replacement lands	Qualify Interests/Special Conservation Interests for which the European site has been designated (Sourced from NPWS online Conservation Objectives, www.npws.ie on the 24/06/2020)	Conservation Objectives	Likely Zone of Impact Determination	Possibility of Significant Effects? (If Yes Progress To Stage 2 Of AA Process)
Tullaghanrock Bog SAC (002354) <b>Distance:</b> 4.6km	<ul> <li>Active raised bogs [7110]</li> <li>Degraded raised bogs still capable of natural regeneration [7120]</li> <li>Depressions on peat substrates of the Rhynchosporion [7150]</li> </ul>	Detailed conservation objectives for this site (Version 1, December 2015) were reviewed as part of the assessment and are available at www.npws.ie	There will be no direct effects as the project footprint is located entirely outside the designated site.  There is no hydrological connectivity between the proposed afforestation site and this European site designated for terrestrial habitats, located in a separate hydrological sub-catchment.  Therefore, no pathway for indirect effect between the proposal and the designated site exists.  No pathway for significant effect was identified and the site is not within the Likely Zone of Impact.	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.
Special Protection A	rea (SPA)			
Bellanagare Bog SPA [004105] <b>Distance:</b> 4.6km	Screenland White-fronted Goose (Anser albifrons flavirostris) [A395]	This site has the generic conservation objective:  'To maintain or restore the favourable conservation condition	There will be no direct effects as the project footprint is located entirely outside the designated site.	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.



European Sites and distance from proposed replacement lands	Qualify Interests/Special Conservation Interests for which the European site has been designated (Sourced from NPWS online Conservation Objectives, www.npws.ie on the 24/06/2020)	Conservation Objectives	Likely Zone of Impact Determination	Possibility of Significant Effects? (If Yes Progress To Stage 2 Of AA Process)
		of the bird species listed as Special Conservation Interests of this SPA."  (NPWS Generic version 7.0, 2020)	Bellanagare Bog SPA is located approximately 4.6km south-west of the proposed afforestation site and is buffered by agricultural, forestry and peatland habitats.  No significant supporting habitat for SCI species within the site and that given the absence of habitat and distance from the SPA no potential for indirect effects as a result of disturbance exist.  No pathway for significant effect was identified and the site is not within the Likely Zone of Impact.	
Lough Gara SPA [004048]  Distance: 9.4km  (12.9km hydrological distance)	<ul> <li>Whooper Swan (Cygnus cygnus) [A038]</li> <li>Greenland White-fronted Goose (Anser albifrons flavirostris) [A395]</li> </ul>	This site has the generic conservation objective:  'To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests of this SPA.'	There will be no direct effects as the project footprint is located entirely outside the designated site.  The proposed afforestation site has surface water connectivity >12.9km downstream with Lough Gara SPA via a stream, running adjacent	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.



European Sites and distance from proposed replacement lands	Qualify Interests/Special Conservation Interests for which the European site has been designated (Sourced from NPWS online Conservation Objectives, www.npws.ie on the 24/06/2020)	Conservation Objectives	Likely Zone of Impact Determination	Possibility of Significant Effects? (If Yes Progress To Stage 2 Of AA Process)
		(NPWS Generic version 7.0, 2020)	along the southern boundary of the site. However, given the distance downstream of the wetland species and nature and small scale of the works as permitted in the technical approval document there is no potential for indirect effects on the SPA.	
			No pathway for significant effect was identified and the site is not within the Likely Zone of Impact.	



### European Sites with the Potential to be Significantly Affected by the Proposed Replacement lands

No European Sites will be affected by the proposed replacement lands.

# Likely Cumulative Impact of the Proposed Works on European Sites, in-combination with other plans and projects

The potential for the proposed replacement lands to contribute to a cumulative effect on European Sites was considered. The online planning system for Roscommon County Council was consulted on the 24/06/2020.

Additional relevant projects identified in the vicinity of the replacement forestry lands around the townland of Shankill, Elphin and Bellanagare in the last 5 years include.

- Permission to construct a Funeral Home, Embalming Theatre and all associated ancillary works at the site located in (Planning Ref.: 1661) – Finalised Application Decision: Conditional,
- Planning permission to carry out refurbishments, to include reroofing and to construct an extension to the existing commercial premises with all associated ancillary works at Elphin (Planning Ref.: 18450) Finalised Application Decision: Conditional,
- Permission for a change of use from retail/office development to 2 no. apartments at the ground floor of property at (Planning Ref.: 1814) - Finalised Application Decision: Conditional,
- > To construct new domestic garage and extension to existing dwelling to contain sunroom together with all associated site works at Shankill Td., Elphin, Co. Roscommon (Planning Ref.: 20114) New Application Decision Due: 04.07.2020
- Permission to construct extension to existing dwelling to contain sunroom together with all associated site works at (Planning Ref.: 20225) New Application.

The following plan has been reviewed and taken into consideration as part of this assessment:

Roscommon County Development Plan 2014-2020

No pathway or mechanism for the proposed replacement lands to result in any significant effect on any European Site was identified when considered on its own during the assessment process and therefore there is no potential for it to contribute to any such effects when considered in-combination with any other plans and projects.

The review of plans and projects that is described above did not reveal any additional potential pathways for effect on European Sites that may have arisen as a result of those plans or projects.



# ARTICLE 6(3) APPROPRIATE ASSESSMENT SCREENING STATEMENT AND CONCLUSIONS

The findings of this Screening Assessment are presented following the European Commission's Assessment of Plans and Projects Significantly affecting Natura 2000 Sites: Methodological Guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC (EC, 2001) and Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (EC, 2018) as well as the Department of the Environment's Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (DoEHLG, 2010).

### **Data Collected to Carry Out Assessment**

In preparation of the report, the following sources were used to gather information:

- > Review of NPWS Site Synopses, Conservation Objectives for the European Sites
- > Review of 2019, 2013 and 2007 EU Habitats Directive (Article 17) Reports.
- Review of online web-mappers: National Parks and Wildlife Service (NPWS), EPA, Water Framework Directive (WFD)
- Review of OS maps and aerial photographs of the site of the proposed project.
- **Review** of other plans and projects within the area.
- > Site visit undertaken on the 14<sup>th</sup> of October 2019 by John Hynes of MKO.

#### 4.2 **Concluding Statement**

It is concluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites, that the proposed replacement land, individually or in combination with other plans and projects, will not have a significant effect on any European Site.

The proposed afforestation has Technical Approval from the Forest Service and will be undertaken accordingly. This approval is conditional to all associated works being undertaken in accordance with Forest Service requirements. The impacts associated with this afforestation have been classified overall as a neutral impact. As such, when considered in combination with the other land uses in the area, and considering that the forestry guidelines are designed to minimise and prevent impacts to habitats that are outside the site, cumulative impacts on sensitive ecological receptors are not anticipated.



#### **BIBLIOGRAPHY**

Bailey, M. and Rochford J. (2006) Otter Survey of Ireland 2004/2005. Irish Wildlife Manuals, No. 23. National Parks and Wildlife Service, Department of Environment, Heritage and Local Government, Dublin, Ireland.

Balmer, D.E., Gillings, S., Caffrey, B.J., Swann, R.L., Downie, I.S. and Fuller, R.J. (2013). Bird Atlas 2007-11: the breeding and wintering birds of Britain and Ireland. BTO Books, Thetford, UK.

Barbour, M.T. and J.B. Stribling. (1991) Use of Habitat Assessment in Evaluating the Biological Integrity of Stream Communities. Biological Criteria: Research and Regulation: 25-38. EPA-440/5-91-005. Washington, DC: Office of Water, US EPA.

CIEEM, 2018, Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine. Version1.1

Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (Habitats Directive) and Directive 2009/147/EC (codified version of Directive 79/409/EEC as amended) (Birds Directive) – transposed into Irish law as European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477/2011).

DEHLG (2009) Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. DEHLG, Dublin.

DoEHLG (2010). Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities. Revision, February, 2010. Department of the Environment, Heritage and Local Government.

EC (2018) Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, Office for Official Publications of the European Communities, Luxembourg. European Commission.

EC (2001) Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC.

EC (2002) 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, Office for Official Publications of the European Communities, Luxembourg. European Commission.

EC (2006) Nature and biodiversity cases: Ruling of the European Court of Justice. Office for Official Publications of the European Communities, Luxembourg.

EC (2007a) Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission. Office for Official Publications of the European Communities, Luxembourg. European Commission.

EC (2007b) Interpretation Manual of European Union Habitats. Version EUR 27. European Commission, DG Environment.

European Communities (Conservation of Wild Birds) Regulations, 1985, SI 291/1985 & amendments – http://www.irishstatutebook.ie

European Communities (Natural Habitats) Regulations, SI 94/1997, SI 233/1998 & SI 378/2005 – http://www.irishstatutebook.ie



Fossitt, J. A. (2000). A Guide to Habitats in Ireland. Dublin: The Heritage Council.

Habitats Directive (92/43/EEC).

Murphy, D.F. (2004) Requirements for the Protection of Fisheries Habitat During Construction and Development Works at River Sites. Eastern Regional Fisheries Board, Dublin.

Natural England (March 2007). Draft Guidance: The Assessment of Regional Strategies and Sub-Regional Strategies Under the Provisions of the Habitats Regulations.

NPWS (2008) The Status of EU Protected Habitats and Species in Ireland. Conservation Status in Ireland of Habitats and Species listed in the European Council Directive on the Conservation of Habitats, Flora and Fauna 92/43/EEC.

NPWS of the DEHLG (2008) The Report on Status of Habitats and Species in Ireland: Technical Reports and Forms.

NPWS Protected Site Synopses and maps available on http://www.npws.ie/en/ProtectedSites/

NPWS (2018) Conservation objectives supporting document – lesser horseshoe bat *(Rhinolophus hipposideros)* Version 1. Conservation Objectives Supporting Document Series. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Dublin, Ireland.

NRA (2004) Environmental Impact Assessment of National Road Schemes – A Practical Guide, National Roads Authority, Dublin.

NRA (2009). Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes. Dublin: National Roads Authority.

NRA (2008). The Management of Noxious Weeds and Non-native Invasive Plant Species on National Roads. Dublin: National Roads Authority.

Scottish Natural Heritage (SNH) (July 2013) Assessing Connectivity with Special Protection Areas (SPA)

Stace, C. A. (1997). New Flora of the British Isles. Cambridge: Cambridge University Press.

Therivel R. (2009) Workshop Material on the Habitats Directive Assessment of Plans Levett-Therivel Sustainability Consultants on behalf of the Heritage Council, Kilkenny.

Therivel, R. (2009) 'Appropriate assessment of plans in England', Environmental Impact Assessment Review 29(4), pp. 261-272.





## **APPENDIX 3**

APPROPRIATE ASSESSMENT SCREENING REPORT – BALLARD CO. WICKLOW



### Article 6 (3) Appropriate Assessment Screening Report

Assessment of Forestry Replacement Lands for Croagh Wind Farm at Ballard, Co. Wicklow





Client: Coillte Teoranta

Project Title: Assessment of Forestry Replacement Lands

for Croagh Wind Farm at Ballard, Co.

Wicklow

Project Number: 180511

Document Title: Appropriate Assessment Screening Report

Document File Name: **AASR F - 2020.07.06 - 180511** 

Prepared By: MKO

Tuam Road Galway Ireland H91 VW84



Rev	Status	Date Author(s)		Approved By
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1.

#### INTRODUCTION

#### 1.1 Background

MKO has been appointed to provide the information necessary to allow the competent authority to conduct an Article 6(3) Screening for Appropriate Assessment of the proposed replacement area is in the townland of Ballard in Co. Wicklow.

Screening for Appropriate Assessment is required under Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive). Where it cannot be excluded that a project or plan, either alone or in combination with other projects or plans, would have a significant effect on a European Site then same shall be subject to an appropriate assessment of its implications for the site in view of the site's conservation objectives. The current project is not directly connected with, or necessary for, the management of any European Site consequently the project has been subject to the Appropriate Assessment Screening process.

The assessment in this report is based on a desk study was undertaken during 2020 as well as site visited on the 18<sup>th</sup> May 2016 by Faith Wilson Ecological Consultant and on the 29<sup>th</sup> October 2018 by Malachy Walsh and Partners (Engineering and Environmental Consultants). It specifically assesses the potential for the proposed replacement lands to result in significant effects on European sites in the absence of any best practice, mitigation or preventative measures.

This Appropriate Assessment Screening Report has been prepared in accordance with the European Commission's Assessment of Plans and Projects Significantly affecting Natura 2000 Sites: *Methodological Guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC* (EC, 2001) and *Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC* (EC, 2018) as well as the Department of the Environment's Appropriate Assessment of Plans and Projects in Ireland - *Guidance for Planning Authorities* (DoEHLG, 2010).

In addition to the guidelines referenced above, the following relevant documents were also considered in the preparation of this report:

- 1. Council of the European Commission (1992) Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora. Official Journal of the European Communities. Series L 20, pp. 7-49.
- EC (2000) Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats'
  Directive 92/43/EEC, Office for Official Publications of the European Communities,
  Luxembourg.
- 3. EC (2007) Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence. Opinion of the commission.
- 4. EC (2013) Interpretation Manual of European Union Habitats. Version EUR 28. European Commission.

### 1.2 Appropriate Assessment

#### 1.2.1 Screening for Appropriate Assessment

The Habitats Directive (Council Directive 92/43/EEC) is implemented in Ireland by the European Communities (Birds & Natural Habitats) Regulations 2011 (S.I. No.477/2011), the European Communities (Birds & Natural Habitats) (Amendment) Regulations 2015 (S.I. No. 355/2015), and the Planning and Development Acts 2000-2015, as amended. The requirement for AA is set out in Article 6 of the Habitats Directive.

1



In summary, Article 6(3) of the Directive requires an Appropriate Assessment to be undertaken where there is a possibility of the proposed project – either individually or in combination with other plans and projects – having an effect on a European site (i.e. a Special Area of Conservation (SAC) or a Special Protection Area (SPA)). The AA focuses on the implications that the proposed project may have in the context of the rationale behind why an area was designated for protection. Article 6(3) continues by stating that statutory approval can only be granted if the assessment has shown that there will be no adverse effects on the integrity of the European site. In cases where the integrity of a site may be impacted, then the requirements of Article 6(4) apply.

Therefore, potential impacts on European sites must be considered by the relevant public authority, listed under the European Communities (Birds & Natural Habitats) Regulations, 2011 (S.I. No.477/2011). The Competent Authority's determination as to whether an Appropriate Assessment is required must be made on the basis of objective information and should be recorded. The Competent Authority may request information to be supplied to enable it to carry out screening.

Consultants or project proponents may provide for the competent authority, the information necessary for them to determine whether an Appropriate Assessment is required and provide advice to assist them in the Article 6(3) Appropriate Assessment Screening decision.

Where it cannot be excluded beyond reasonable scientific doubt at the Screening stage, that a proposed plan or project, individually or in combination with other plans and projects, would have a significant effect on the conservation objectives of a European site, an Appropriate Assessment is required.

Where An Appropriate Assessment is required, the Competent Authority may require the applicant to prepare a Natura Impact Statement.

The term Natura Impact Statement (NIS) is defined in legislation. An NIS, where required, should present the data, information and analysis necessary to reach a definitive determination as to 1) the implications of the plan or project, alone or in combination with other plans and projects, for a European site in view of its conservation objectives, and 2) whether there will be adverse effects on the integrity of a European site. The NIS should be underpinned by best scientific knowledge, objective information and by the precautionary principle.

#### **Statement of Authority**

The replacement lands were visited on the 18<sup>th</sup> May 2016 by Faith Wilson Ecological Consultant and on the 29th October 2018 by Malachy Walsh and Partners (Engineering and Environmental Consultants). This report has been prepared by Claire Stephens (B.Sc. Env.) and David McNicholas (B.Sc., M.Sc., MCIEEM) of MKO. Claire is an experienced ecologist with over 2 years' professional ecological consultancy experience. David has over 9 years' professional ecological consultancy experience and is a full member of the Chartered Institute of Ecology and Environmental Management. This report has been reviewed by Pat Roberts (B.Sc., MCIEEM) who has over 15 years' experience in ecological assessment and management.



# DESCRIPTION OF THE PROPOSED REPLACEMENT LANDS

#### 2.1 Site Location

The forestry replacement land (the site) is located within the townland of Ballard in Co. Wicklow, approximately 1.3km west of the village of Ballinaclash and approximately 4km southwest of the Rathdrum town. Avondale Forest is located 3.5km to the east. (Grid Reference: E 315424 N 184332). The site is accessed via a track directly off a local unnamed road which runs along the southern boundary. A site location map is provided in Figure 2.1.

#### 2.2 Characteristics of the Proposed Replacement Lands

#### 2.2.1 **Description of the project**

This report provides a description of the forestry replacement land and an assessment of the potential impacts, including in-combination impacts, associated with afforestation at Ballard, Co. Wicklow

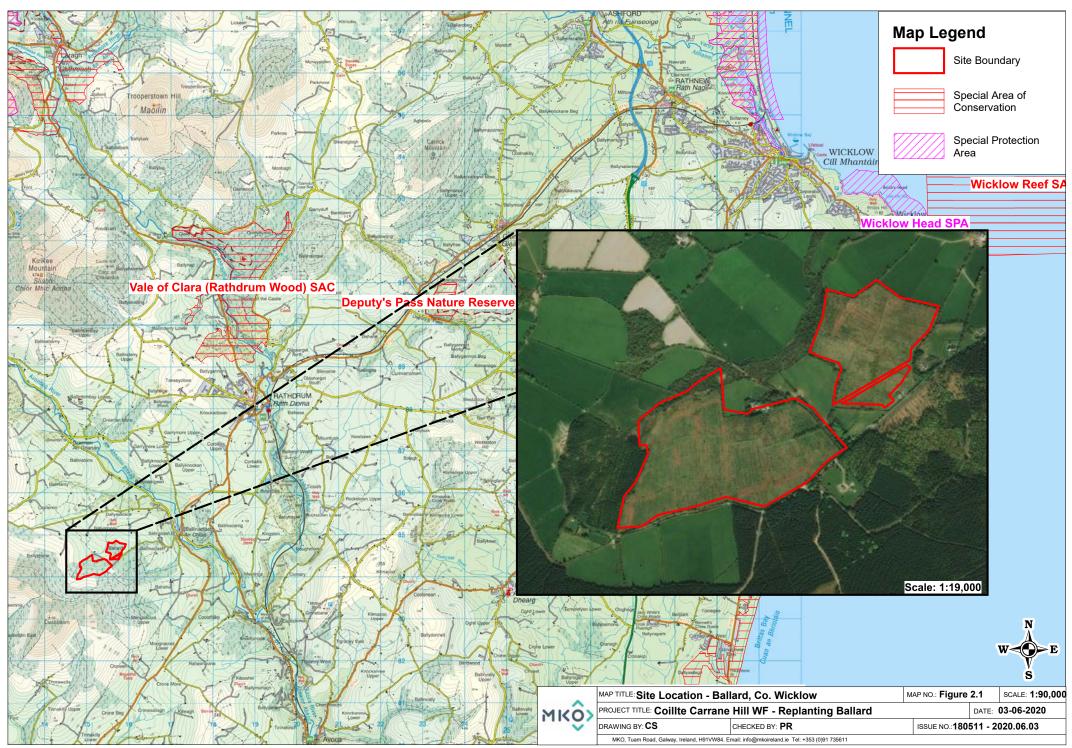
Construction of the proposed Croagh Wind Farm will require felling of 55.1 hectares of forestry. The lands of 39.56ha at Ballard, Co. Wicklow was identified as a potential forestry replacement area.

## Description of the Baseline Ecological Environment

The proposed afforestation site was visited on the 18<sup>th</sup> May 2016 by Faith Wilson Ecological Consultant and on the 29<sup>th</sup> October 2018 by Malachy Walsh and Partners (Engineering and Environmental Consultants). The dominant habitats at the site were *scrub (WS2)*. *In* the western block, the scrub formed a habitat mosaic with *dry-humid acid grassland (GS3)*. Pockets of *dense bracken (HD1*) occurs throughout the site, mostly adjoining disused tracks which are classified as *recolonising bare ground (ED3)*. The site boundaries are a combination of *hedgerow (WL1)* habitat and *treeline (WL2)*. Both the eastern and western extent of the Ballard site each features a small area of *Immature woodland (WS2)*, consisting of birch (*Betula* sp.). The western extent of the Ballard site features a small area of *mixed broadleaved conifer woodland (WD2)*, *conifer plantation (WD4)* and *wet grassland (GS4)*.

The Ballyeustace Stream, classified as *depositing/lowland river (FW2*), flows along the north-western and northern boundary of the western compartment and along the northern boundary of the eastern compartment. The sides of this stream are well vegetated by willows (*Salix sp.*) and birch (*Betula sp.*). The shallow drains were dry at the time of the survey and had floral cover of terrestrial plants.

No habitats which correspond to those that are listed in Annex I of the EU Habitats Directive were identified during the site visit.





#### 2.3.1 Fauna in the Existing Environment

#### Bats

There are no structures within the site which may provide suitable roosting habitat for bats. Treelines, hedgerows, woodland habitat and the stream habitat within and around the site are likely to be utilised by commuting and foraging bat species.

#### Birds

Bird species recorded within the site included jay (Garrulus glandarius), snipe (Gallinago gallinago), buzzard (Buteo buteo), kestrel (Falco tinnunculus) and stonechat (Saxicola torquata). The site provided habitat for a range of common and widespread species but not of significance for rare or protected bird species. No evidence of bird species for which surrounding SPAs have been designed were recorded within the site and the site does not provide a significant area of suitable habitat for such species. Bird species recorded within the site were common species. Given the lack of significant habitat for rare or protected bird species, there is no requirement for further bird surveys at the site.

#### Other faunal species

A comprehensive search of the site for mammals was undertaken. Evidence of badger (a subsidiary sett) and sitka deer was seen while onsite as well as droppings were identified within the afforestation boundary.

The watercourse along the site boundaries is likely to be utilised by commuting and foraging otter. Otter is listed on Annex II and IV of the EU Habitats Directive and is protected under the Irish Wildlife Act. No suitable habitat for other species of conservation concern was identified within the proposed afforestation site.

4



# IDENTIFICATION OF RELEVANT EUROPEAN SITES

## Identification of the European Sites within the Likely Zone of Impact

The following methodology was used to establish which European Sites are within the Likely Zone of Impact of the proposed replacement lands:

- Initially the most up to date GIS spatial datasets for European designated sites and water catchments were downloaded from the NPWS website (www.npws.ie) and the EPA website (www.epa.ie) on the 24/06/2020. The datasets were utilized to identify European Sites which could feasibly be affected by the proposed replacement lands.
- All European Sites within a distance of 15km surrounding the replacement lands were identified and are shown on Figure 3.1. In addition, the potential for connectivity with European Sites at distances of greater than 15km from the proposed replacement lands was also considered in this initial assessment. In this case, no potential connectivity with sites located at a distance of over 15km from the proposed replacement lands was identified.
- > The catchment mapping was used to establish or discount potential hydrological connectivity between the site of the proposed replacement lands and any European Sites. The hydrological catchments are also shown in Figure 3.1.
- In relation to Special Protection Areas, in the absence of any specific European or Irish guidance in relation to such sites, the Scottish Natural Heritage (SNH) Guidance, 'Assessing Connectivity with Special Protection Areas (SPA)' (2016) was consulted. This document provides guidance in relation to the identification of connectivity between proposed replacement lands and Special Protection Areas. The guidance takes into consideration the distances species may travel beyond the boundary of their SPAs and provides information on dispersal and foraging ranges of bird species which are frequently encountered when considering plans and projects.
- Table 3.1, provides details of all relevant European Sites as identified in the preceding steps and assesses which are within the likely Zone of Impact. The assessment considers any likely direct or indirect impacts of the proposed replacement lands, both alone and in combination with other plans and projects, on European Sites by virtue of the following criteria: size and scale, land-take, distance from the European Site or key features of the site, resource requirements, emissions, excavation requirements, transportation requirements and duration of construction, operation and decommissioning were considered in this screening assessment
- The site synopses and conservation objectives of these sites, as per the NPWS website (www.npws.ie), were consulted and reviewed at the time of preparing this report 24/06/2020. Figure 3.1 shows the location of the proposed replacement lands in relation to all European sites within 15km of the proposed replacement lands.
- Where potential pathways for Significant Effect are identified, the site is included within the Likely Zone of Impact and further assessment is required.

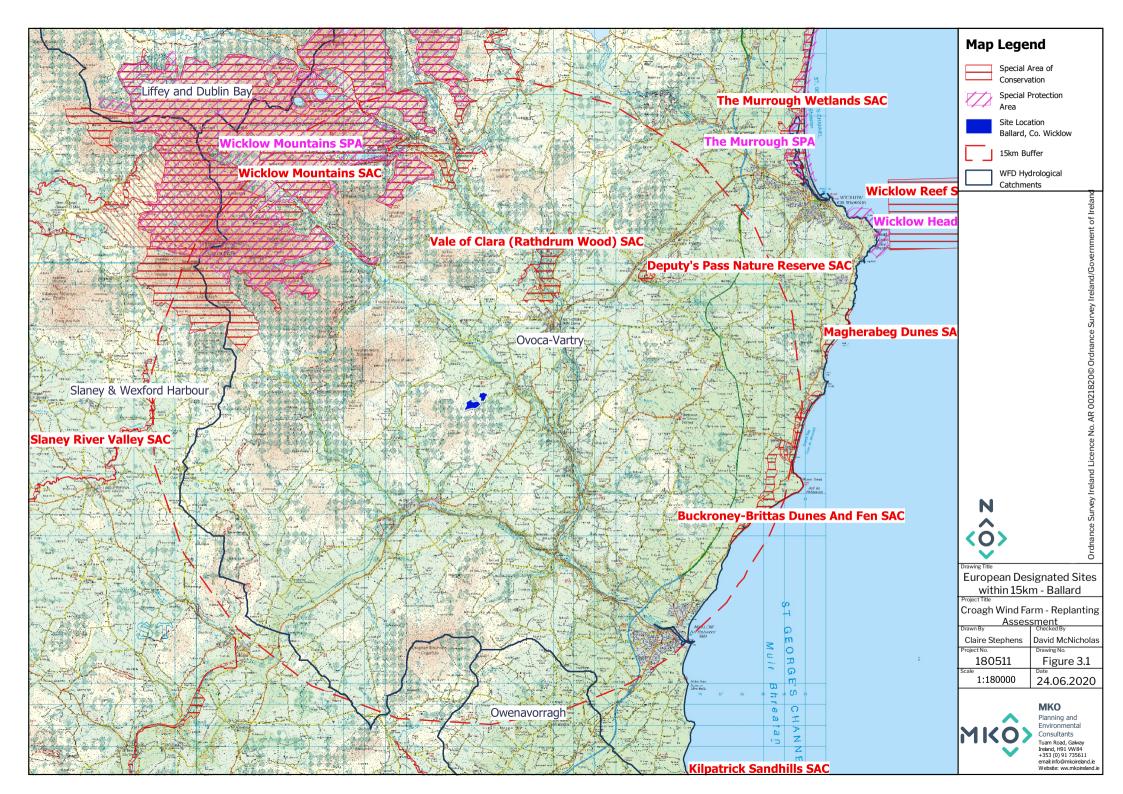




Table 3.1 Identification of Designated sites within the Likely Zone of Impact

	resignated sites within the takery 2011e of hip			
European Sites and distance from proposed replacement lands	Qualify Interests/Special Conservation Interests for which the European site has been designated (Sourced from NPWS online Conservation Objectives, www.npws.ie on the 24/06/2020	Conservation Objectives	Likely Zone of Impact Determination	Possibility of Significant Effects? (If Yes Progress To Stage 2 Of AA Process)
Special Areas of Cor	nservation (SAC)			
Vale of Clara (Rathdrum Wood) SAC (000733) <b>Distance:</b> 4.7km	> Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]	'To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.'  (NPWS Generic version 7.0, 2020)	There will be no direct effects as the project footprint is located entirely outside the designated site.  This European site is designated for terrestrial habitats and is located in a separate hydrological sub-catchment to the proposed afforestation works. No pathway for indirect effect between the proposal and the designated site exists.  No pathway for significant effect was identified and the site is not within the Likely Zone of Impact.	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.
Wicklow Mountains SAC (002122) <b>Distance:</b> 7.8km	Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110]	Detailed conservation objectives for this site (Version 1, July 2017) were reviewed as part of the assessment and are available at <a href="https://www.npws.ie">www.npws.ie</a>	There will be no direct effects as the project footprint is located entirely outside the designated site.  Wicklow Mountains SAC is located approximately 7.8km north-west of	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.



>	Natural dystrophic lakes and	the proposed afforestation site and are	
	ponds [3160]	buffered by agricultural, forestry,	
>	Northern Atlantic wet heaths	peatland and scrub habitats.	
	with E <i>rica tetralix</i> [4010]	Although the sites are located within	
>	European dry heaths [4030]	the same hydrological catchment, no	
>	Alpine and Boreal heaths	hydrological connectivity exists	
	[4060]	between the proposed replacement	
>	Calaminarian grasslands of	lands and the designated site.	
	the Violetalia calaminariae		
	[6130]	No pathway for effect was identified	
>	Species-rich Nardus	and the site is not within the Likely	
	grasslands, on siliceous	Zone of Impact.	
	substrates in mountain areas		
	(and submountain areas, in		
	Continental Europe) [6230]		
>	Blanket bogs (* if active bog)		
_	[7130]		
>	Siliceous scree of the		
	montane to snow levels		
	(Androsacetalia alpinae and		
	Galeopsietalia ladani) [8110]		
>	Calcareous rocky slopes with		
	chasmophytic vegetation		
	[8210]		
<b>&gt;</b>	Siliceous rocky slopes with		
	chasmophytic vegetation		
	[8220]		
<b>&gt;</b>	Old sessile oak woods with		
	Ilex and Blechnum in the		
	British Isles [91A0]		
<b>)</b>	Lutra lutra (Otter) [1355]		



Deputy's Pass Nature Reserve SAC (000717) <b>Distance:</b> 9.0km	>	Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]	'To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.'  (NPWS Generic version 7.0, 2020)	There will be no direct effects as the project footprint is located entirely outside the designated site.  This European site is designated for terrestrial habitats. There is no connectivity between the replacement site and the SAC. Therefore, no pathways for indirect effects were identified.  No pathway for effect was identified and the site is not within the Likely Zone of Impact.	
Buckroney-Brittas Dunes and Fen SAC (000729) <b>Distance:</b> 13.4km	> > > > >	Annual vegetation of drift lines [1210] Perennial vegetation of stony banks [1220] Mediterranean salt meadows (Juncetalia maritimi) [1410] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Atlantic decalcified fixed dunes (Calluno-Ulicetea) [2150]	Detailed conservation objectives for this site (Version 1,March 2017) were reviewed as part of the assessment and are available at <a href="https://www.npws.ie">www.npws.ie</a>	There will be no direct effects as the project footprint is located entirely outside the designated site.  This European site is located in a separate hydrological sub-catchment to the proposed afforestation works. Given the nature and small scale of the works and the distance between the works and the SAC, no pathways for indirect effects via surface water were identified.  No pathway for significant effect was identified and the site is not within the Likely Zone of Impact.	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.



	>	Dunes with Salix repens ssp. argentea (Salicion arenariae) [2170] Humid dune slacks [2190] Alkaline fens [7230]			
Slaney River Valley SAC (000781) Distance: 14.7km	<pre>&gt;&gt;</pre>	Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410] Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] Margaritifera margaritifera (Freshwater Pearl Mussel) [1029]	Detailed conservation objectives for this site (Version 1, October 2011) were reviewed as part of the assessment and are available at <a href="https://www.npws.ie">www.npws.ie</a>	There will be no direct effects as the project footprint is located entirely outside the designated site.  This European site is located in a separate hydrological catchment to the proposed afforestation works. Given the nature and small scale of the works and the distance between the works and the SAC, no pathways for indirect effects exist.  No pathway for significant effect was identified and the site is not within the Likely Zone of Impact.	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.



	<ul> <li>Petromyzon marinus (Sea Lamprey) [1095]</li> <li>Lampetra planeri (Brook Lamprey) [1096]</li> <li>Lampetra fluviatilis (River Lamprey) [1099]</li> <li>Alosa fallax fallax (Twaite Shad) [1103]</li> <li>Salmo salar (Salmon) [1106]</li> <li>Lutra lutra (Otter) [1355]</li> <li>Phoca vitulina (Harbour Seal) [1365]</li> </ul>			
Special Protection A	rea (SPA)			
Wicklow Mountains SPA (004040) <b>Distance:</b> 7.8km	<ul> <li>Merlin (Falco columbarius)         [A098]</li> <li>Peregrine (Falco peregrinus)         [A103]</li> </ul>	This site has the generic conservation objective:  'To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests of this SPA.''  (NPWS Generic version 7.0, 2020)	There will be no direct effects as the project footprint is located entirely outside the designated site.  The proposed afforestation site is located outside of the core foraging range of Merlin (5km core range) and Peregrine (2km core range) (SHN 2016). The site does not support significant suitable habitat for the SCI species for which the	No – Potential for significant effect has been excluded and there is no need to progress to Stage 2 of the Appropriate Assessment process.



SPA is designated. Therefore, potential for indirect effects as a result of disturbance can be ruled out.
No pathway for significant effect was identified and the site is not within the Likely Zone of Impact.



### European Sites with the Potential to be Significantly Affected by the Proposed Replacement Lands

No European Sites will be affected by the proposed replacement lands.

# 3.3 Likely Cumulative Impact of the Proposed Works on European Sites, in-combination with other plans and projects

The potential for the proposed replacement lands to contribute to a cumulative effect on European Sites was considered. The online planning system for Wicklow County Council was consulted on the 24/06/2020.

Additional relevant projects identified in the townland of Ballard, in the vicinity of the replacement forestry lands, around the townland of Ballinaclash in the last 5 years were assessed. These include;

- Permission for a two storey dwelling with connection to services, garage and associated works (Planning Ref.: 161241) Finalised Application Decision: Conditional,
- Permission for the construction of a dwelling, connection to existing public services and associated site works (Planning Ref.: 16765) Finalised Application Decision: Conditional,
- Retention of a garage as constructed and all ancillary site works (Planning Ref.: 16759), Finalised Application Decision: Conditional,
- Permission for a covered silage pit, milking parlour / dairy / plant unit / cattle handling facility, calf shed, construction dirty water tank, silage effluent tank, rainwater harvesting tank, demolition of calf shed (Planning Ref.: 171367) Finalised Application Decision: Conditional,
- Permission for the construction of a single storey dwelling, garage, bored well, wastewater treatment system together with all associated site works (Planning Ref.: 1750),
- Permission for two semidetached dwellings with connection to services, entrance and site and associated works (Planning Ref.: 191025) - Finalised Application Decision: Conditional
- Permission for 2 no. two storey dwellings with connection to services, surfaced access driveway and associated works (Planning Ref.: 20566) New Application Decision due: 12.08.2020.

The following plan has been reviewed and taken into consideration as part of this assessment:

Wicklow County Development Plan 2016 - 2022

The review focused on policies and objectives that relate to European sites. None of the objectives reviewed had the potential to result in cumulative adverse effects on any European Site.

No pathway or mechanism for the proposed replacement lands to result in any significant effect on any European Site was identified when considered on its own during the assessment process and therefore there is no potential for it to contribute to any such effects when considered in-combination with any other plan or project.

The review of plans and projects that is described above did not reveal any additional potential pathways for effect on European Sites that may have arisen as a result of those plans or projects.



# ARTICLE 6(3) APPROPRIATE ASSESSMENT SCREENING STATEMENT AND CONCLUSIONS

The findings of this Screening Assessment are presented following the European Commission's Assessment of Plans and Projects Significantly affecting Natura 2000 Sites: Methodological Guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC (EC, 2001) and Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (EC, 2018) as well as the Department of the Environment's Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (DoEHLG, 2010).

### **Data Collected to Carry Out Assessment**

In preparation of the report, the following sources were used to gather information:

- Site visits: 18<sup>th</sup> May 2016 & 29th October 2018
- > Review of NPWS Site Synopses, Conservation Objectives for the European Sites
- Review of 2019, 2013 and 2007 EU Habitats Directive (Article 17) Reports.
- Review of online web-mappers: National Parks and Wildlife Service (NPWS), EPA, Water Framework Directive (WFD)
- Review of OS maps and aerial photographs of the site of the proposed project.
- Review of other plans and projects within the area.

#### 4.2 **Concluding Statement**

It is concluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites, that the proposed forestry replacement land, individually or in combination with other plans and projects, will not have a significant effect on any European Site.

The proposed afforestation has Technical Approval from the Forest Service and will be undertaken accordingly. This approval is conditional to all associated works being undertaken in accordance with Forest Service requirements. The impacts associated with this afforestation have been classified overall as a neutral impact. As such, when considered in-combination with the other land uses in the area, and considering that the forestry guidelines are designed to minimise and prevent impacts to habitats that are outside the site, cumulative impacts on sensitive ecological receptors are not anticipated.



#### **BIBLIOGRAPHY**

Bailey, M. and Rochford J. (2006) Otter Survey of Ireland 2004/2005. Irish Wildlife Manuals, No. 23. National Parks and Wildlife Service, Department of Environment, Heritage and Local Government, Dublin, Ireland.

Balmer, D.E., Gillings, S., Caffrey, B.J., Swann, R.L., Downie, I.S. and Fuller, R.J. (2013). Bird Atlas 2007-11: the breeding and wintering birds of Britain and Ireland. BTO Books, Thetford, UK.

Barbour, M.T. and J.B. Stribling. (1991) Use of Habitat Assessment in Evaluating the Biological Integrity of Stream Communities. Biological Criteria: Research and Regulation: 25-38. EPA-440/5-91-005. Washington, DC: Office of Water, US EPA.

CIEEM, 2018, Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine. Version1.1

Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (Habitats Directive) and Directive 2009/147/EC (codified version of Directive 79/409/EEC as amended) (Birds Directive) – transposed into Irish law as European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477/2011).

DEHLG (2009) Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. DEHLG, Dublin.

DoEHLG (2010). Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities. Revision, February, 2010. Department of the Environment, Heritage and Local Government.

EC (2018) Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, Office for Official Publications of the European Communities, Luxembourg. European Commission.

EC (2001) Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC.

EC (2002) 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, Office for Official Publications of the European Communities, Luxembourg. European Commission.

EC (2006) Nature and biodiversity cases: Ruling of the European Court of Justice. Office for Official Publications of the European Communities, Luxembourg.

EC (2007a) Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission. Office for Official Publications of the European Communities, Luxembourg. European Commission.

EC (2007b) Interpretation Manual of European Union Habitats. Version EUR 27. European Commission, DG Environment.

European Communities (Conservation of Wild Birds) Regulations, 1985, SI 291/1985 & amendments – http://www.irishstatutebook.ie

European Communities (Natural Habitats) Regulations, SI 94/1997, SI 233/1998 & SI 378/2005 – http://www.irishstatutebook.ie



Fossitt, J. A. (2000). A Guide to Habitats in Ireland. Dublin: The Heritage Council.

Habitats Directive (92/43/EEC).

Murphy, D.F. (2004) Requirements for the Protection of Fisheries Habitat During Construction and Development Works at River Sites. Eastern Regional Fisheries Board, Dublin.

Natural England (March 2007). Draft Guidance: The Assessment of Regional Spatial Strategies and Sub-Regional Strategies Under the Provisions of the Habitats Regulations.

NPWS (2008) The Status of EU Protected Habitats and Species in Ireland. Conservation Status in Ireland of Habitats and Species listed in the European Council Directive on the Conservation of Habitats, Flora and Fauna 92/43/EEC.

NPWS of the DEHLG (2008) The Report on Status of Habitats and Species in Ireland: Technical Reports and Forms.

NPWS Protected Site Synopses and maps available on http://www.npws.ie/en/ProtectedSites/

NPWS (2018) Conservation objectives supporting document – lesser horseshoe bat *(Rhinolophus hipposideros)* Version 1. Conservation Objectives Supporting Document Series. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Dublin, Ireland.

NRA (2004) Environmental Impact Assessment of National Road Schemes – A Practical Guide, National Roads Authority, Dublin.

NRA (2009). Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes. Dublin: National Roads Authority.

NRA (2008). The Management of Noxious Weeds and Non-native Invasive Plant Species on National Roads. Dublin: National Roads Authority.

Scottish Natural Heritage (SNH) (July 2013) Assessing Connectivity with Special Protection Areas (SPA)

Stace, C. A. (1997). New Flora of the British Isles. Cambridge: Cambridge University Press.

Therivel R. (2009) Workshop Material on the Habitats Directive Assessment of Plans Levett-Therivel Sustainability Consultants on behalf of the Heritage Council, Kilkenny.

Therivel, R. (2009) 'Appropriate assessment of plans in England', Environmental Impact Assessment Review 29(4), pp. 261-272.







# **APPENDIX 4-4**

CONSTRUCTION AND ENVIRONMENTAL MANAGEMENT PLAN



# Construction and Environmental Management Plan

Proposed Croagh Wind Farm, Co. Leitrim & Co. Sligo



# **DOCUMENT DETAILS**

Client: Coillte

Project Title: Croagh Wind Farm

Project Number: **180511** 

Document Title: Construction and Environmental

**Management Plan** 

Document File Name: **CEMP - 2020.07.06 - 180511 - F** 

Prepared By: MKO

Tuam Road Galway Ireland H91 VW84



Rev	Status	Date	Author(s)	Approved By
01	Draft	20/03/2019	EG	EM
02	Final	06/07/2020	EM	MW



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#### 1. INTRODUCTION

This Construction and Environmental Management Plan (CEMP) has been developed by McCarthy Keville O' Sullivan Ltd. (MKO) on behalf of Coillte, who intend to apply to both Letrim County Council and Sligo County Council for planning permission to construct a wind energy development that straddles the border between Co Leitrim and Co Sligo, comprising up to 10 no. wind turbines and associated infrastructure, near Drumkeeran, Co. Leitrim.

Should the project secure planning permission, this CEMP will be updated, in line with all conditions and obligations which apply to any grant of permission. The CEMP should be read in conjunction with the EIAR and planning drawings. The CEMP, due to its structure and nature will also require constant updating and revision throughout the construction period as set out below. Therefore, this is a working document and will be developed further prior to and during the construction phase of the wind farm development.

Triggers for amendments to the CEMP will include:

- When there is a perceived need to improve performance in an area of environmental impact;
- As a result of changes in environmental legislation applicable and relevant to the project;
- Where the outcomes from auditing establish a need for change;
- and
- As a result of an incident or complaint occurring that necessitates an amendment.

This report provides the environmental management framework to be adhered to during the precommencement, construction and operational phases of the Proposed Development and it incorporates the mitigating principles to ensure that the work is carried out in a way that minimises the potential for any environmental impacts to occur. The CEMP also details the mitigation measures to be implemented in order to comply with the environmental commitments outlined in the EIAR. The contractor will be contractually obliged to comply with all such measures.

This report is intended as a single, amalgamated document that can be used during the future phases of the project, as a single consolidated point of reference relating to all construction, environmental and drainage requirements for the Planning Authority, developer and contractors alike.

# Scope of Construction and Environmental Management Plan

This report is presented as a guidance document for the construction of the proposed Croagh Wind Farm including connection to the national grid. Where the term 'site' is used in the CEMP it refers to all works associated with the proposed development enabling works. The CEMP outlines clearly the mitigation measures and monitoring proposals that are required to be adhered to in order to complete the works in an appropriate manner.

The report is divided into nine sections, as outlined below.

- Section 1 provides a brief introduction as to the scope of the report.
- Section 2 outlines the Site and Project details, detailing the targets and objectives of this plan along with providing an overview of construction methodologies that will be adopted throughout the project.



- Section 3 sets out details of the environmental controls to be implemented on site. Site drainage measures, peat stability monitoring measures and a waste management plan are also included in this section.
- Section 4 sets out a fully detailed implementation plan for the environmental management of the project outlining the roles and responsibilities of the project team.
- > Section 5 outlines the Emergency Response Procedure to be adopted in the event of an emergency in terms of site health and safety and environmental protection.
- > Section 6 consists of a summary table of all mitigation proposals to be adhered to during the project, categorised into three separate headings, 1) pre-commencement measures; 2) construction-phase measures and 3) operational-phase measures.
- > Section 7 consists of a summary table of all monitoring requirements and proposals to be adhered to during the project, categorised into three separate headings, 1) precommencement measures; 2) construction-phase measures and 3) operational-phase
- > Section 8 sets out a programme for the timing of the works.
- > Section 9 outlines the proposals for reviewing compliance with the provisions of this report.



# SITE AND PROJECT DETAILS

#### 2.1 Site Location

The core of the proposed development site is located within existing commercial forestry, approximately 5.0 kilometres south of the village of Drumkeeran, Co. Leitrim and 7.3 kilometres southeast of the town of Dromahair, Co. Leitrim at its closest point. Access to the site, during the construction phase, will be via a proposed new construction access road off the R280 Regional Road in Drumkeeran. The principal site entrance for the proposed development during both the construction and operational phase will be via an existing entrance off the L4282 local road.

It is proposed to connect the development to the national electricity grid via an underground cable which will connect the proposed onsite substation to the existing Garvagh substation. This connection and all associated works form part of the planning application.

The proposed development site is used for commercial forestry, with widespread young to mature forestry coverage. Wind energy is also a significant land-use in the vicinity of the proposed Croagh Wind Farm, and includes the operating Garvagh Glebe, Black Banks, Carrane Hill and Geevagh wind farms. The Garvagh Glebe wind farm is located adjacent to the boundary of the proposed development site. In addition to forestry and wind energy, other land-uses in the surrounding area include agriculture, peat-cutting and low-density residential.

# 2.2 Description of the Development

The proposed development will comprise the construction of up to 10 No. wind turbines and all associated works. The proposed turbines will have a maximum blade tip height of up to 170 metres. The full description of the proposed development is as follows:

- Construction of 10 No. wind turbines with a maximum overall blade tip height of up to 170 metres, and associated hardstand areas;
- I no. 38kV permanent electrical substation including a control building with welfare facilities, all associated
  electrical plant and equipment, security fencing, all associated underground cabling, waste water holding tank
  and all ancillary works;
- 3. 1 no. permanent Meteorological Mast with a maximum height of up to 100 metres;
- All associated underground electrical and communications cabling connecting the turbines to the proposed wind farm substation:
- All works associated with the connection of the proposed wind farm to the national electricity grid, via underground cabling to the existing Garvagh substation;
- 6. Upgrade of existing tracks and roads, provision of new site access roads and hardstand areas;
- 7. The partial demolition and alteration of two agricultural buildings in the townlands of Sheena and associated junction access and road works to the existing yard, agricultural buildings and agricultural lands in the townlands of Sheena and Derrybofin to provide a link road primarily for construction traffic off the R280. This link road will be used for the delivery of abnormal loads to the site during the construction period and may be used during the operational period if necessary or to facilitate the decommissioning of the wind farm. Following construction, access to the link road will be closed off and the yard/agricultural building will revert to its use for agricultural purposes except if and when required for delivery of abnormal loads during the operational period of the windfarm or to facilitate the decommissioning of the wind farm;
- 1 no. borrow pit;
- 9. 2 no. peat and spoil repository areas
- 10. 2 no. temporary construction compounds;
- Recreation and amenity works, including marked trails, boardwalk and viewing area provision of a
  permanent amenity car park, and associated recreation and amenity signage
- 12. Site Drainage;
- 13. Permanent Signage;
- 14. Ancillary Forestry Felling to facilitate construction and operation of the proposed development; and
- 15. All associated site development works



# 2.3 Targets and Objectives

The construction phase works are designed to approved standards, which include specified materials, standards, specifications and codes of practice. The design of the project has considered environmental issues and this is enhanced by the works proposals.

The key site targets are as follows;

- Adopt a sustainable approach to construction and, ensure sustainable sources for materials supply where possible;
- Keeping all watercourses free from obstruction and debris;
- Avoidance of any pollution incident or near miss as a result of working around or close to existing watercourses and having emergency measures in place;
- Correct fuel storage and refuelling procedures to be followed;
- Air and noise pollution prevention to be implemented;
- Correct management of peat stability;
- > Construction Methods and designs will be altered where it is found there is an adverse effect on the environment;
- Good waste management and house-keeping to be implemented;
- Using recycled materials if possible, e.g. excavated stone, soil and subsoil material;
- Avoidance of vandalism;
- Monitoring of the works and any adverse effects that it may have on the environment; and,
- Provide adequate environmental training and awareness for all project personnel.

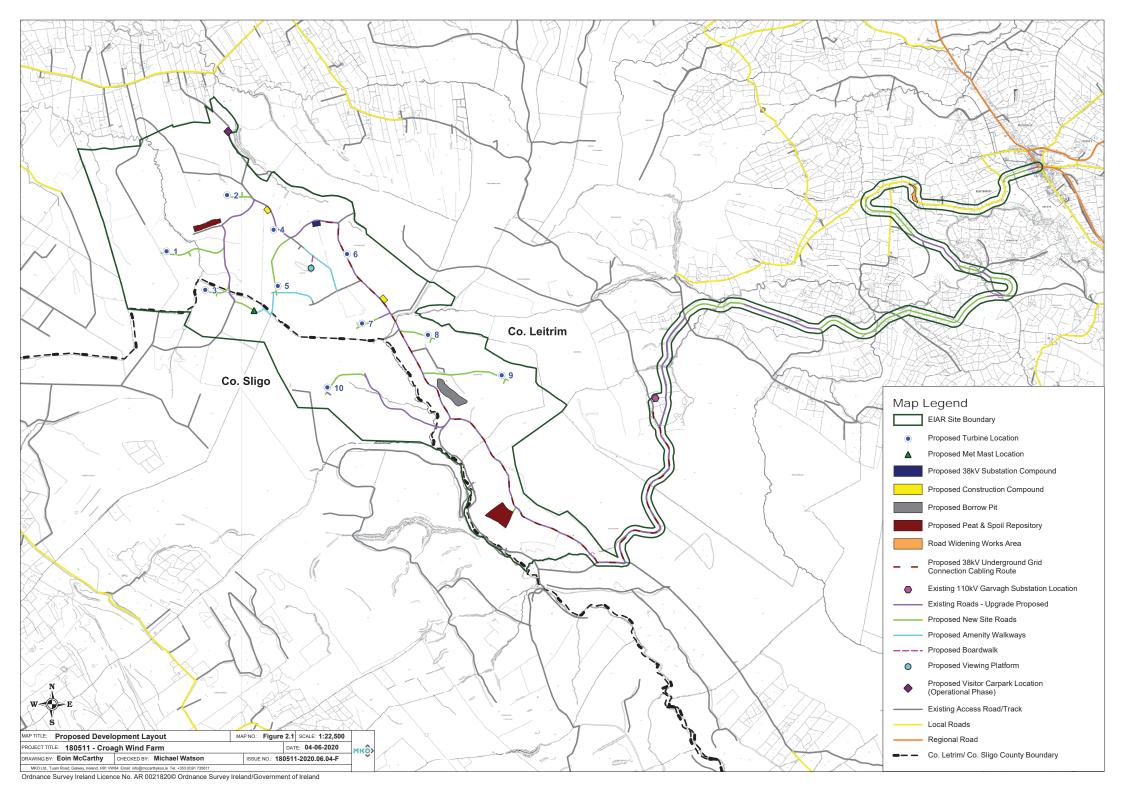
The key site objectives are as follows;

- Keep impact of construction to a minimum on the local environment, watercourses, habitats and wildlife;
- Comply with all relevant water quality legislation;
- Ensure construction works and activities are completed in accordance with mitigation and best practice approach presented in the Environmental Impact Assessment Report, Natura Impact Statement and associated planning documentation;
- Ensure construction works and activities are completed in accordance with any planning conditions for the development;
- Ensure construction works and activities have minimal impact/disturbance to local landowners and the local community; and
- Ensure construction works and activities have minimal impact on the Natural Environment.

# 2.4 Construction Methodologies Overview

#### 2.4.1 Introduction

An experienced main contractor will be appointed for the civil works for the construction phase of the Proposed Development. The appointed contractor for the works will be required to comply with this CEMP and any revisions made to this document in the preparation of method statements for the various elements of the construction phase of the proposed development. An overview of the proposed Construction and Demolition Methodologies is provided below.





# 2.4.2 Overview of Proposed Construction Methodology

The proposed construction methodology is summarised under the following main headings:

- Site Access Roads
- > Temporary Construction Compound
- **>** Borrow Pit
- Peat and Spoil Repositories
- Site Drainage System
- Culvert crossings
- > Proposed Clear-span Watercourse Crossings
- Crane Hardstands
- > Turbine and Anemometry Mast Foundations
- Electricity Substation and Control Buildings
- **>** Cable Trenching
- Grid Connection Cabling

This section of the CEMP also includes the methodology for the partial demolition and alteration of two agricultural buildings in the townlands of Sheena and associated junction access road works in the townlands of Sheena and Derrybofin to provide a link road for construction traffic off the R280.

#### 2.4.3 Site Access Roads

The road construction design has taken into account the following key factors as stated in the Fehily Timoney & Company's (FTC) Peat & Spoil Management Plan in Appendix 4-2 of the EIAR:

- 1. Buildability considerations
- 2. Serviceability requirements for construction and wind turbine delivery and maintenance vehicles
- 3. Minimise excavation arising
- 4. Requirement to minimise disruption to peat hydrology

Whilst the above key factors are used to determine the road design the actual construction technique employed for a particular length of road are determined on the prevailing ground conditions encountered along that length of road.

The proposed upgrade to existing roadways and construction of new roadways will incorporate passing bays to allow traffic to pass easily while traveling around the site.

#### 2.4.3.1.1 Upgrade to Existing Roads or Tracks

The general construction methodology for upgrading of existing sections of excavated and floating roads or tracks, as presented in FTC's Peat & Spoil Management Plan in Appendix 4.2, is summarised below. This methodology includes procedures that are to be included in the construction to minimise any adverse impact on peat stability.

- 5. For upgrading of existing excavated access tracks the following guidelines apply:
  - a. Excavation will be required on one or both sides of the existing access track to a competent stratum.
  - b. Granular fill to be placed and compacted in layers
  - c. The surface of the existing access track should be overlaid with up to 500mm of selected granular fill.
  - d. Access roads to be finished with a layer of capping across the full width of the road.



- e. A layer of geogrid/geotextile may be required at the surface of the existing access road in areas where the existing track shows signs of excessive rutting, etc.
- f. For excavations in peat and spoil, side slopes shall be not greater than 1 (v):3 (h). Where areas of weaker peat are encountered then shallower slopes will be required to ensure stability.
- 6. For upgrading of existing floated access tracks the following guidelines apply:
  - a. The make-up of the existing floating access roads on site is generally locally tree brash/trunks laid directly onto the peat surface and/or geotextile overlain by up to 500mm of coarse granular fill/till type (fine granular/cohesive) site won material. It should be noted that there are localised variations in the make-up of the existing floated access tracks on site, frequently no tree brash/trunks were used in the make-up and the presence of a geogrid was also noted in localised sections of the existing track.
  - b. The surface of the existing access track will be levelled prior the placement of any geogrid/geotextile, where necessary (to prevent damaging the geogrid/geotextile).
  - c. Where coarse granular fill has been used in the existing floated access road make-up, a layer of geogrid will be placed on top of the existing floated access track.
  - d. Where fine granular/cohesive type material has been used in the existing floated access road make-up (as is the case on some of the existing access roads in the southeast of the site), a layer of geotextile will be required as a separator layer with a layer of geogrid.
  - e. The geogrid will be overlaid with up to 500mm of selected granular fill. Granular fill to be placed and compacted in layers.
- 7. The finished road width will have a running width of 5m, with wider sections on bends and corners.
- 8. On side long sloping ground any road widening works required will be done on the upslope side of the existing road where possible.
- 9. At transitions between new floating and existing excavated roads a length of road of about 10 to20m shall have all peat excavated and replaced with suitable fill. The surface of this fill shall be graded so that the road surface transitions smoothly from floating to excavated road.
- 10. A final surface layer shall be placed over the existing access track, to provide a road profile and graded to accommodate wind turbine construction and delivery traffic.

#### 2.4.3.2 Construction of New Excavated Roads

Excavate and replace type access roads are the conventional method for construction of access roads on peatland sites and the preferred construction technique on this site.

The general methodology for the construction of excavated roads, as presented in FTC's Peat & Spoil Management Plan in Appendix 4-2 of the EIAR, is summarised below. This methodology includes procedures that are to be included in the construction to minimise any adverse impact on peat stability.

- 1. Prior to commencing road construction movement monitoring posts will be installed in areas where the peat depth is greater than 2m.
- 2. Interceptor drains will be installed upslope of the access road alignment to divert any surface water away from the construction area.
- 3. Excavation will take place to a competent stratum beneath the peat.
- 4. Road construction will be carried out in sections of approximately 50m lengths i.e. no more than 50m of access road should be excavated without replacement with stone fill.
- 5. Excavation of materials with respect to control of peat stability.



- a. Acrotelm (top about 0.3 to 0.4m of peat) is generally required for landscaping and shall be stripped and temporarily stockpiled for re-use as required.

  Acrotelm stripping shall be undertaken prior to main excavations.
- b. Where possible, the acrotelm shall be placed with the vegetation part of the sod facing the right way up to encourage growth of plants and vegetation.
- c. All catotelm peat (peat below about 0.3 to 0.4m depth) shall be transported immediately on excavation to the borrow pit or peat repositories.
- 6. Side slopes in peat shall be not greater than 1 (v): 2 or 3 (h). This slope inclination will be reviewed during construction, as appropriate. Where areas of weaker peat are encountered then shallower slopes will be required. Battering of the side slopes of the excavations will be carried out as the excavation progresses.
- The excavated access road will be constructed of up to 1000mm of selected granular fill.
- 8. Access roads to be finished with a layer of capping across the full width of the road.
- 9. A layer of geogrid/geotextile may be required at the surface of the competent stratum.
- 10. At transitions between floating and excavated roads a length of road of about 10 to 20m shall have all peat excavated and replaced with suitable fill. The surface of this fill shall be graded so that the road surface transitions smoothly from floating to excavated road.
- 11. Where steeper slopes are encountered along with relatively deep peat (i.e. typically greater than 1m) and where it is proposed to construct the access road perpendicular to the slope contours it is best practice to start construction at the bottom of the slope and work towards the top, where possible. This method avoids any unnecessary loading to the adjacent peat and greatly reduces any risk of peat instability.
- 12. A final surface layer shall be placed over the excavated road and graded to accommodate wind turbine construction and delivery traffic.

#### 2.4.3.3 Construction of New Floating Roads

In a number of areas across the site of the Proposed Development it will be necessary to construct floating roads over peat.

The general construction methodology for the construction of floating, as presented in FTC's Peat and Spoil Management Plan in Appendix 4-2 of the EIAR, is summarised below. This methodology includes procedures that are to be included in the construction to minimise any adverse impact on peat stability.

- 1. Prior to commencing floating road construction movement monitoring posts will be installed in areas where the peat depth is greater than 3m.
- 2. Base geogrid to be laid directly onto the existing peat surface along the line of the road in accordance with geogrid provider's requirements.
- 3. The typical make-up of the new floated access road is a minimum of 1000mm of selected granular fill with 2 no. layers of geogrid with possibly the inclusion of a basal layer of tree trunks/brash.
- Granular fill to be placed in layers and compacted in accordance with the TII Specification for Road Works.
- 5. During construction of the floated access roads it may be necessary to include pressure berms either side of the access road in some of the deeper/weaker peat areas. The inclusion of a 2 to 5m wide pressure berm (typically 0.5m in height) either side of the access road at such locations will reduce the likelihood of potential bearing failures beneath the access road.
- 6. The finished running width of the road will be 5m, with wider sections on bends and corners.
- 7. Stone delivered to the floating road construction shall be end-tipped onto the constructed floating road. Direct tipping of stone onto the peat shall not be carried out.



- 8. To avoid excessive impact loading on the peat due to concentrated end-tipping all stone delivered to the floating road shall be tipped over at least a 10m length of constructed floating road.
- 9. Where it is not possible to end-tip over a 10m length of constructed floating road due to the presence of weak deep peat then dumpers delivering stone to the floating road shall carry a reduced stone load (not greater than half full) until such time as end-tipping can be carried out over a 10m length of constructed floating road.
- 10. Following end-tipping a suitable bulldozer shall be employed to spread and place the tipped stone over the base geogrid along the line of the road.
- 11. A final surface capping layer shall be placed over the full width of the floating road, as per design requirements, to provide a road profile and graded to accommodate wind turbine construction and turbine delivery traffic.

The 3.75 kilometres of proposed amenity walkways will be constructed using a methodology similar to that of new floating roads, as outlined above. The walkways will measure approximately 2.5m in width.

#### 2.4.4 Crane Hardstands

All crane pads will be designed taking account of the loadings provided by the turbine manufacturer and will consist of a compacted stone structure. The crane hardstands will be constructed in a similar manner to the excavated site roads and to the turbine manufacturer's specifications. The largest predicted area has been assessed in this EIAR.. Where an excavated crane hardstand cannot be used due to the depth of peat, the hardstand will be supported by using reinforced concrete piles as per the methodology outlined for piled foundations summarised below. The position of the crane pads varies between turbine locations depending on topography, position of the site access road, and the turbine position.

# **Temporary Construction Compounds**

The temporary construction compounds will be constructed as follows:

- > The area to be used as the compound will be marked out at the corners using ranging rods or timber posts. Drainage runs and associated settlement ponds will be installed around the perimeter;
- > The compound platform will be established using a similar technique as the construction of the substation platform discussed above;
- A layer of geo-grid will be installed, and compacted layers of well graded granular material will be spread and lightly compacted to provide a hard area for site offices and storage containers;
- Areas within the compound will be constructed as site roads and used as vehicle hardstandings during deliveries and for parking;
- The compound will be fenced and secured with locked gates if necessary; and,
- Upon completion of the Proposed Development the temporary construction compound will be decommissioned by backfilling the area with the material arising during excavation, landscaping with topsoil as required.

The visitorcar park that is proposed as part of the recreation and amenity facilities will be constructed in a similar manner to the proposed temporary construction compounds.

#### 2.4.6 **Borrow Pit**

The development will comprise 1 no. borrow pit. It is proposed to obtain the majority of all rock and hardcore material that will be required during the construction of the proposed development from the



on-site borrow pit Usable rock may also be won from other infrastructure construction including the substation and the turbine base excavations.

The proposed borrow pit is located approximately 430 metres west of Turbine No. 9, measures approximately 20,930m<sup>2</sup> in area and is shown in Figure 2.1. The borrow pit will typically be excavated as follows:

- > The areas to be used for both borrow pit will be marked out at the corners using ranging rods or timber posts. Drainage runs and associated settlement ponds will be installed around the perimeter;
- Interceptor drainage ditches will be excavated on all sides of the borrow pit to catch surface water runoff, and direct it to downstream re-distribution locations;
- The borrow pit will be constructed so that the base of the borrow pit is below the level of the adjacent section of access road.
- The bedrock material will be extracted from the borrow pit and stockpiled or used as required;
- The use of material won from the borrow pit will be sequential with new road construction or turbine base formations;
- As the borrow pit excavations progress and become deeper, surface water and groundwater ingress will be removed via pumping to settlement ponds, and redistribution locally across natural vegetated areas. Where required, additional specialist treatment will be employed to ensure no deterioration in downstream water quality occurs;
- > Slopes within the excavated rock formed around the perimeter of the borrow pit will be formed at stable inclinations to suit local in-situ rock conditions.
- Infilling of the peat & spoil will commence at the back edge of the borrow pit and progress towards the borrow pit entrance/rock buttress. Leaving in place upstands/segments ofintact rock which will help to retain the placed peat & spoil and will allow the borrow pit to be developed and infilled in cells.
- A rock buttress is required at the downslope edge of the borrow pit to safely retain the infilled peat and spoil. The height of therock buttresses constructed should be greater than the height of the infilled peat & spoil to prevent any surface peat & spoil run-off. A buttress up to 7m (approx.) in height is likely to be required.
- The rock buttress will be founded on competent strata. The founding stratum for the rock buttress should be inspected and approved by the project geotechnical engineer.
- In order to prevent water retention occurring behind the buttresses, the buttresses will be constructed of coarse boulder fill with a high permeability.
- > The surface of the placed peat & spoil will be shaped to allow efficient run-off of surface water from the placed arising's.
- Control of groundwater within the borrow pit will be required.
- Further guidelines on the construction of the borrow pit are included within Section 7.4 of the Peat & Spoil Management Plan (Appendix 4-2 of the EIAR)

Post-construction, the borrow pit area will be permanently secured and a stock-proof fence will be erected around the borrow pit areas to prevent access to these areas. Appropriate health and safety signage will also be erected on this fencing and at locations around the fenced area.

# 2.4.7 **Peat and Spoil Repositories**

Two locations have been identified as suitable peat and spoil repository areas and are shown in Figure 4.1. The peat depth within the footprint of the repositories is generally less than 1.5m. Repository No. 1 is located approximately 1,080m south of Turbine No. 9 and measures approximately 24,770 square metres. Repository No. 2 is located approximately 210m southwest of Turbine No. 2 and measures approximately 9,760 square metres. Both repository areas are located adjacent to existing roads.



Both repository areas have a perimeter buttress which will contain and ensure the placed peat and spoil remains stable in the long-term. Prior to the placement of any excavated peat and spoil, the permanent stone buttresses shall be constructed around the perimeter of the repository areas. Construction details for each of the repository areas are shown on the layout drawings in Appendix 4-1 of the EIAR.

The presence of perimeter buttresses will help prevent the flow of any saturated peat which may occur at the surface of the placed peat over the life time of the repository and will also allow some drainage of the placed peat and spoil within the repository areas.

The repository areas in particular the stone buttresses shall be constructed as follows:

- All stone buttresses required within the repository areas will be founded on mineral soil or bedrock i.e. competent strata. The founding stratum for each stone buttress will be inspected and approved by a geotechnical engineer or competent person.
- In order to prevent water retention occurring behind the buttresses, the buttresses will be constructed of coarse boulder fill with a high permeability. The buttresses will be constructed of well graded granular rock fill of about 100mm up to typically 500mm in size. Alternatively, drains will be placed through the buttresses to allow excess water to drain.
- > The height of the stone buttresses constructed will be greater than the height of the stored peat and spoil to prevent any surface run-off. The height of the stone buttresses will be a minimum of 0.5m above the height of the placed peat and spoil to prevent any potential for saturated peat to flow out of the repository area.
- > The side slopes of the stone buttresses shall be constructed at 45 degrees. The stone buttresses will be widened to allow construction traffic access for tipping purposes during the placement of the excavated peat and spoil.
- An interceptor drain will also be installed upslope of the repository areas. The drain will divert any surface water away from the repository area and hence prevent water from ponding in the area.
- A settlement pond will be required at the lower side of the repository areas.
- A granular layer of material will be required at the base of the stored spoil immediately upslope of the stone buttresses to act as a drainage layer. This drainage layer will aid in preventing a build-up of pore water pressure behind the stone buttress.
- The placement of the excavated spoil will commence at the downslope edge of the repository area against the stone buttress and placement will then continue upslope against the stone buttress and placement will then continue upslope.
- It is important that the surface of the stored spoil be shaped to allow efficient run-off of water from the stored spoil.
- Supervision by a geotechnical engineer or appropriately competent person is required for the construction of the repository area.

The management of excavated peat and overburden and the methods of placement and/or reinstatement are described in detail in FTC's Peat and Spoil Management Plan in Appendix 4-2 of this EIAR.

# 2.4.8 **Drainage System**

The early establishment of temporary drainage facilities will manage the risk of impacts on watercourses on and adjacent to the site during construction. In addition, construction operations will adopt best working practices. The development of the site will need to be phased accordingly. The construction of the drainage will start from the downstream sections and progress upstream, connecting conveyance systems with other drainage features as each development phase progresses. They will be designed with sufficient flexibility to respond to an early phase incoming flow during the construction phase.



Surface drainage design and management is summarised in Section 3.2 below.

# 2.4.9 Culvert Crossings on the Wind Farm Site

Culverts will be required where site roads, crane pads and turbine pads cross main forestry drainage networks.

Culverts will be installed with a minimum internal gradient of 1% (1 in 100). Smaller culverts will have a smooth internal surface. Larger culverts may have corrugated surfaces which will trap silt and contribute to the stream ecosystem. Depending on the management of water on the downstream side of the culvert, large stone may be used to interrupt the flow of water. This will help dissipate its energy and help prevent problems of erosion. Smaller water crossings will simply consist of an appropriately sized pipe buried in the sub-base of the road at the necessary invert level to ensure ponding or pooling doesn't occur above or below the culvert and water can continue to flow as necessary.

All culverts will be inspected regularly to ensure they are not blocked by debris, vegetation or any other material that may impede conveyance. Any watercourse crossings required will be installed outside of the salmonid spawning season, October to June in any year, in accordance with Inland Fisheries Ireland best practice (IFI, 2016). This will ensure no potential impacts on salmonid spawning habitat.

All of the above works will be supervised by the Environmental Clerk of Works and the project hydrologist.

# 2.4.10 Proposed Clear-span Watercourse Crossing

It is proposed to construct clear-span watercourse crossings along the access roads to Turbine No. 1 and Turbine No. 10 using corrugate metal arches. The locations of these crossings are shown as *Proposed New Watercourse Crossing No. 1* and *No. 2* on the layout drawings included in Appendix 4-1 of this EIAR. It is proposed that these crossings will be constructed using a corrugated metal arch and appropriate backfill.

The typical construction methodology for the installation of a corrugated metal arch and stone clear-span bridge is presented below:

- The access road on the approach to the watercourse will be completed to a formation level which is suitable for the passing of plant and equipment required for the installation of the watercourse crossing.
- The foundation will consist of concrete panels which will be installed on a concrete lean mix foundation to provide a suitable base. The base will be excavated to rock or competent ground with a mechanical excavator with the foundation formed in-situ using a semi-dry concrete lean mix. The base will be excavated along the stream bank with no instream works required.
- The bottom plate of the arch will be bolted to the foundation on both sides of the stream. The top section of the culvert will be bolted together and lifted into position and bolted to the two bottom sections. This sequence will continue until the full length of culvert is in position.
- Once the arch is in position stone backfill will be placed and compacted against the culvert up to the required level above the foundations. A concrete beam will then be shuttered, fixed and poured along the two shoulders of the steel culvert.
- When the concrete beams are cured the filling and compaction of the road will be completed.

A further four new water course crossings will be required as part of the proposed development. The locations of these crossings are shown as *Proposed New Watercourse Crossing No. 3* to *No. 7* on the



layout drawings in Appendix 4-1. It is proposed that these crossings will be constructed using bottomless, pre-cast concrete structures.

The typical construction methodology for the installation of a pre-cast concrete clear-span bridge is presented below:

- > The access road on the approach to the watercourse will be completed to a formation level which is suitable for the passing of plant and equipment required for the installation of the watercourse crossing.
- > All drainage measures along the proposed road will be installed in advance of the works.
- > The abutment will consist of concrete panels which will be installed on a concrete lean mix foundation to provide a suitable base. The base will be excavated to rock or competent ground with a mechanical excavator with the foundation formed in-situ using a semi-dry concrete lean mix. The base will be excavated along the stream bank with no instream works required.
- Access to the opposite side of the river for excavation and foundation installation will require the installation of pre-cast concrete slab across the river to provide temporary access for the excavator.
- All pre-cast concrete panels and slabs/beams will be installed using a crane which will be set up on the bank of the watercourse and will be lifted into place from the bank with no contact with the watercourse.
- A concrete deck will be poured over the beams/slabs which span across the river. This will be shuttered, sealed and water tested before concrete pouring can commence.

The watercourse crossings will be constructed to the specifications of the OPW bridge design guidelines 'Construction, Replacement or Alteration of Bridges and Culverts - A Guide to Applying for Consent under Section 50 of the Arterial Drainage Act, 1945', and in consultation with Inland Fisheries Ireland. Abutments will be constructed from precast units combined with in-situ foundations, placed within an acceptable backfill material.

# 2.4.11 Turbine and Anemometry Mast Foundations

The wind turbines and anemometry mast foundations will be a reinforced concrete base designed to Eurocode 2/BS8110. Foundation loads will be provided by wind turbine and mast supplier, and factors of safety will be applied to these in accordance with European design regulations. The turbine will be anchored to the foundation using a bolt assembly which shall be cast into the concrete. The anemometry mast is a free-standing structure which is also anchored to the reinforced concrete foundation. It is anticipated that the foundations for both the turbines and the anemometry mast will be either piled or ground bearing foundations and that the formation level of the turbine foundations will be on the lower mineral subsoil or bedrock. Turbine bases will measure approximately 20 metres in diameter, while the anemometry mast base will measure approximately 25 square metres. They will be formed a minimum of one metre below the base of the peat layer on stiff subsoil material or bedrock, or at a suitable level directed by the Geotechnical Engineer/Designer. The foundations will be constructed as follows:

- The extent of the excavation will be marked out and will include an allowance for trimming the sides of the excavation to provide a safe working area and slope batter;
- Where practical, the peat will be stripped over the area of the excavation and stored locally for reuse, the subsoil will be excavated and stored to one side for reuse during the landscaping around the finished turbine;
- No material will be removed from site and storage areas will be stripped of vegetation prior to stockpiling in line with best working practices;
- All groundwater and surface water arising from turbine base excavation will be pumped to the dirty water system prior to discharge from the works area;



- Soil excavation shall be observed by a qualified archaeologist in accordance with a scheme of archaeological monitoring to identify any significant remains as they come to light and,
- > The foundation excavation will be raised to formation level by compacted layers of well graded granular material, spread and compacted to provide a hard area for the turbine foundation.

#### Reinforced concrete piled foundations will be completed as follows:

- > The extent of the excavation will be marked out and will include an allowance for trimming the sides of the excavation to provide a safe working area and slope batter;
- No material will be removed from site and placement areas will be stripped of vegetation prior to placement in line with best working practices;
- A piling platform for the piling rig will be constructed. This will be done by laying geotextile on the existing surface and a stone layer will then be placed on top of the geotextile by an excavator and compacted in order to give the platform sufficient bearing capacity for the piling rig.
  - The piling rig, fitted with an auger, will then bore through the soft material with a sleeve fitted around the auger to prevent the sidewalls of the peat from collapsing. The borehole is then extended to a suitable depth into the subsoil/bedrock.
  - When the auger and the sleeve are removed high tensile steel cages will be lowered into the boreholes. These steel cages will extrude above the level of the top of the concrete pile.
  - As the auger is removed concrete is pumped into the borehole.
  - **>** Reinforcing steel on the top of the pile will tie to the foundation base steel.
  - > The procedure for standard excavated reinforced concrete bases as outlined below can be applied from here.

#### Standard excavated reinforced concrete bases will be completed as follows:

- A layer of concrete blinding will be laid approximately 75mm thick directly on top of the newly exposed formation, tamped and finished with a screed board to leave a flat level surface. The concrete will be protected from rainfall during curing and all surface water runoff from the curing concrete should be prevented from entering surface water drainage directly;
- High tensile steel reinforcement will be fixed in accordance with the designer's drawings & schedules. The foundation anchorage system will be installed, levelled and secured to the blinding using steel box section stools;
- Ductwork will be installed as required, and formwork erected around the steel cage and propped from the backside as required;
- The foundation anchorage system will be checked both for level and line prior to the concrete being installed in the base. These checks will be passed to turbine manufacturer for their approval;
- Concrete will be placed using a concrete pump and compacted using vibrating pokers to the levels and profile indicated on the drawings. Upon completion of the concreting works the foundation base will be covered and allowed to cure;
- > Steel shutters will be used to pour the circular chimney section;
- **>** Earth wires will be placed around the base; and,
- > The foundation will be backfilled with a cohesive material, where possible using the material arising during the excavation and landscaped using the vegetable soil set aside during the excavation.
- Soil, rock and other materials excavated during construction shall be managed in line with the recommendations/ best practice guidelines outlined in Section 4.3.4 of Chapter 4 of the EIAR.



# 2.4.12 Onsite Electricity Substation and Control Building

The proposed electricity substation will be constructed by the following methodology:

- The area of the onsite substation will be marked out using ranging rods or wooden posts and the soil and overburden stripped and removed to nearby temporary storage area for later use in landscaping. Any excess material will be sent to one of the on-site peat repositories or the proposed borrow pit, for reinstatement purposes.
- The dimensions of the onsite substation area have been designed to meet the requirements of the ESB and the necessary equipment to safely and efficiently operate the proposed wind farm;
- A control building will be built within the onsite substation compound;
- The foundations will be excavated down to the level indicated by the designer and appropriately shuttered reinforced concrete will be laid over it. An anti-bleeding admixture will be included in the concrete mix;
- > The block work walls will be built up from the footings to DPC level and the floor slab constructed, having first located any ducts or trenches required by the follow on mechanical and electrical contractors;
- > The block work will then be raised to wall plate level and the gables & internal partition walls formed. Scaffold will be erected around the outside of the building for this operation;
- The roof slabs will be lifted into position using an adequately sized mobile crane;
- The timber roof trusses will then be lifted into position using a telescopic load all or mobile crane depending on site conditions. The roof trusses will then be felted, battened, tiled and sealed against the weather.
- The electrical equipment will be installed and commissioned.
- Perimeter fencing will be erected.
- **>** The construction and components of the substation are to ESB specifications.

# 2.4.13 Cable Trenching and Grid Connection

The transformer in each turbine is connected to the substation through a network of buried electrical cables. The ground is trenched typically using a mechanical excavator. The top layer of soil is removed and saved so that it is replaced on completion. The cables will be bedded with suitable material. The cables will be laid at a depth that meets all national and international requirements, and will generally be approximately 1.3m in depth and 0.6m in width; a suitable marking tape is installed between the cables and the surface (see Plate 2-1 below). On completion, the ground will be reinstated as previously described above. The route of the cable ducts will follow the access track to each turbine location, and are visible on the site layout drawings included as Appendix 4-1 of the EIAR.

The proposed on-site substation will be connected to the existing Garvagh 110kV Electricity Substation via underground grid connection cabling which will be constructed to ESB specifications, using the methodology outlined below.

# 2.4.14 Grid Connection Construction Methodology

The underground cabling (UGC) works will consist of the installation of ducts in an excavated trench to accommodate power cables, and a fibre communications cable to allow communications between the Croagh Wind Farm Substation and Garvagh Substation.

The UGC will either be a single circuit or a double circuit 38kV connection, in accordance with the requirements and specifications of ESB . The difference between the two connection types is the number of ducts, the number of cables and the width of the trench and associated joint bay chambers. A single circuit connection typically consists of 3 no. 110mm diameter HDPE power cable ducts and 1 no. 110mm



diameter HDPE communications duct to be installed in an excavated trench, typically 600mm wide by 1,220mm deep. A double circuit connection typically consists of 6 no. 110mm diameter HDPE power cable ducts and 2 no. 110mm diameter HDPE communications duct to be installed in an excavated trench, typically 900mm wide by 1,220mm deep. For trench designs there will be variations on the design to adapt to service crossings and watercourse crossings.

The power cable ducts will accommodate the power cables and the communications duct(s) will accommodate a fibre cable(s) to allow communications between the Croagh Wind Farm substation and Garvagh Substation. The ducts will be installed, the trench reinstated in accordance with landowner or local authority specification, and then the electrical cabling/fibre cable is pulled through the installed ducts in approximately 650/750m sections. Construction methodologies to be implemented and materials to be used will ensure that the UGC is installed in accordance with the requirements and specifications of ESB.

The underground cable required to facilitate the grid connection will be laid beneath the surface of the site and/or public road using the following the methodology summarised below, and outlined in detail in TLI Group's Croagh Wind Farm 38kVGrid Connection – Construction Methodology included as Appendix 4-5 of this EIAR:

The Contractor, and their appointed Site Manager, will prepare a targeted Method Statement concisely outlining the construction methodology and incorporating all mitigation and control measures included within the planning application and accompanying reports and as required by planning conditions where relevant;

- All existing underground services shall be identified on site prior to the commencement of construction works;
- At watercourse crossings, the contractor will be required to adhere to the environmental control measures outlined within the planning application and accompanying reports, the final Construction Environmental Management Plan (CEMP) and best practice construction methodologies;
- Where the cable route intersects with culverts, the culvert will remain in place (where possible) and the ducting will be installed either above or below the culvert to provide minimum separation distances in accordance with ESB specifications;
- Traffic management measures will be implemented in accordance with those included in the Chapter 14 of this EIAR and a final Traffic Management Plan will be prepared and agreed with the local authority;
- The excavated trench will be approximately 600/900mm in width and approximately 1220mm deep both within the public road network and within Coillte lands;
- The base of the excavated trench will be lined with sand bedding to be imported to site from a local licensed supplier. The 110mm diameter HDPE cable ducting will be placed into the prepared trench, inspected and backfilled as per Figures 4 & 5;
- Excavated material will be temporarily stockpiled onsite for re-use during reinstatement. Stockpiles will be restricted to less than 2m in height. Stockpiles will be located a minimum of 50m from surface water features and all stockpiling locations will be subject to approval by the Site Manager and Project Ecological Clerk of Works (ECoW);
- Excavated material shall be reused to backfill the trench where appropriate and any surplus material will be transported to either the proposed onsite borrow pit or repository areas;
- Any earthen (sod) banks to be excavated will be carefully opened with the surface sods being stored separately and maintained for use during reinstatement;
- The excavated trench will be dewatered if required, from a sump installed within the low section of the opened trench. Where dewatering is required, silt laden water will be fully and appropriately attenuated, through silt bags, before being appropriately discharged to vegetation or surface water drainage feature (please refer to drainage design in the proposed development);
- Where required, grass will be reinstated by either seeding or by replacing with grass turves;



- No more than a 100 metre section of trench will be opened at any one time. The second 100 metres will only be excavated once the majority of reinstatement has been completed on the first:
- The excavation, installation and reinstatement process will take on average of 1 no. day to complete a 100m section;
- Where the cable is being installed in a roadway, temporary reinstatement may be provided to allow larger sections of road to be permanently reinstated together;
- Following the installation of ducting, pulling the cable will take approximately 1 day between each joint bay, with the jointing of cables taking approximately 1-2 days.



Plate 2-1 Typical Cable Trench View

# 2.4.14.1 Existing Underground Services

In order to facilitate the installation of the proposed UGC, it may be necessary to relocate existing underground services such as water mains or existing cables. In advance of any construction activity, the contractor will undertake additional surveys of the proposed route to confirm the presence or otherwise of any services. If found to be present, the relevant service provider will be consulted with in order to determine the requirement for specific excavation or relocation methods and to schedule a suitable time to carry out works.

If existing low voltage underground cables are found be present, a trench will be excavated, and new ducting and cabling will be installed along the new alignment and connected to the network on either end. The trench will be backfilled with suitable material to the required specification. Warning strip and marking tape will be laid at various depths over the cables as required. Marker posts and plates will be installed at surface level to identify the new alignment of the underground cable, the underground cables will then be re-energised.

In the event that water mains are encountered the water supply will be turned off by the utility so work can commence on diverting the service. The section of existing pipe will be removed and will be replaced with a new pipe along the new alignment of the service. The works will be carried out in accordance with the utility standards.



#### 2.4.14.2 **Joint Bays**

Joints Bays are to be provided approximately every 750m - 800m along the UGC route to facilitate the jointing of 2 no. lengths of UGC. The joint bays will be pre-cast concrete structures installed below finished ground level. The joint bay width varies between single and double circuits (2.03 - 2.7m). Joint Bays will be located in the non-load bearing strip of roadways insofar as possible.

In association with Joint Bays, Communication Chambers are required at every joint bay location to facilitate communication links between the Croagh Wind Farm substation and the existing Garvagh 110kV Substation. Earth Sheath Link Chambers are also required approximately every second joint bay along the cable route. Earth Sheath Links are used for earthing and bonding cable sheaths of underground power cables, installed in a flat formation, so that the circulating currents and induced voltages are eliminated or reduced. Earth Sheath Link Chambers and Communication Chambers are located in close proximity to Joint Bays. Earth Sheath Link Chambers and Communication Chambers will typically be pre-cast concrete structures with an access cover at finished surface level. The locations of the joint bays and chambers are shown on the site layout drawings in Appendix 4-1.

The precise siting of all Joint Bays, Earth Sheath Link Chambers and Communication Chambers within the planning corridor is subject to approval by ESBN.

#### 2.4.14.3 Grid Connection Watercourse/Culvert Crossings

Nine watercourse crossing locations were identified along the cable route. All of the watercourse crossings identified are culverts and no bridge crossings have been identified. It is proposed to cross all watercourses using open trenching with either an undercrossing or an overcrossing, depending on the depth of the culvert. A schedule of the culverts identified and the proposed crossing method to be implemented is detailed in Appendix 4-6 of this EIAR and the locations are shown on the site layout drawings included in Appendix 4-1. Should an alternative methodology option be required for individual crossings during the construction process this will be agreed with the relevant authorities including prior to works commencing. The proposed culvert crossing methods are detailed in Figure 2-2 below, the number of ducts will vary between a single and double circuit connection.

Where the cable route intersects with existing watercourses, a detailed construction method statement will be prepared by the Contractor prior to the commencement of construction and is to be approved by the Local Authority and relevant environmental agencies as required.

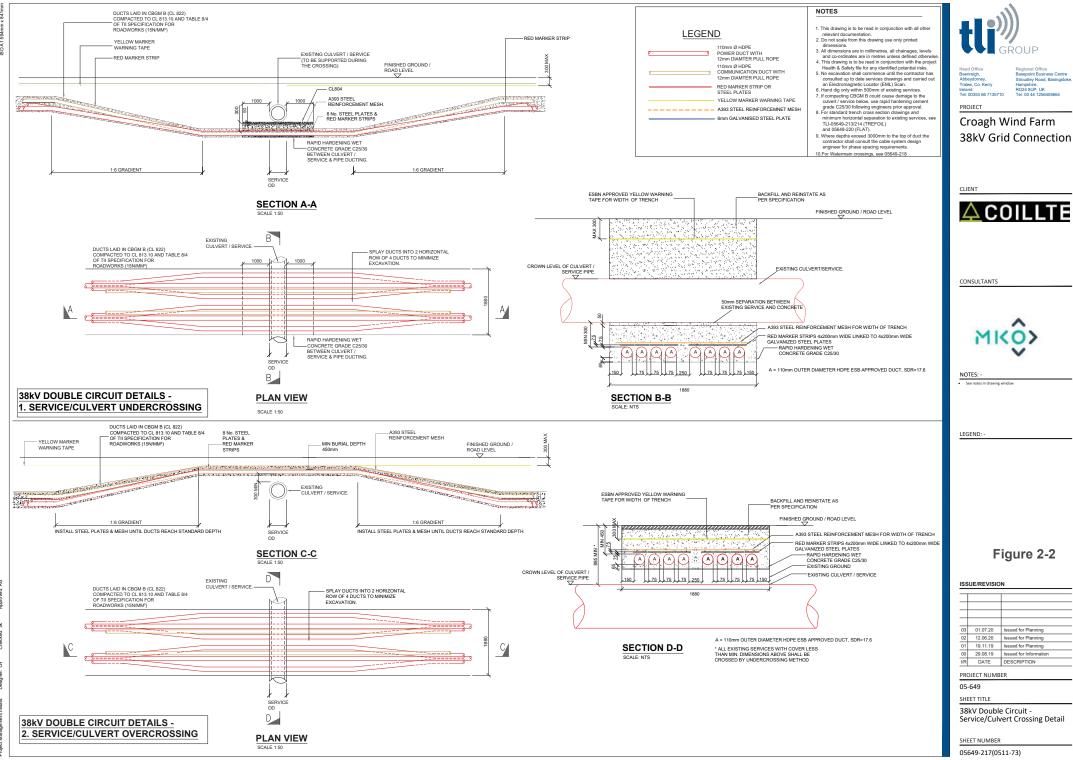
Inland Fisheries Ireland have published guidelines relating to construction works along water bodies entitled "Requirements for the Protection of Fisheries Habitats during Construction and Development Works at River Sites", and these guidelines will be adhered to during the construction of the proposed development.

# 2.4.14.4 Horizontal Direction Drilling

It is not currently proposed to implement Horizontal Directional Drilling (HDD) for any crossings. However, following confirmatory site investigations prior to construction it may be necessary to utilise HDD for some crossings.

Horizontal Direction Drilling (HDD) is a method of drilling under obstacles such as bridges, culverts, railways, water courses, etc. in order to install cable ducts under the obstacle. This method is employed where installing the ducts using standard installation methods is not possible. The proposed HDD methodology is as follows: -

A works area of circa .40 square metres will be fenced on both sides of a crossing



Stroudley Road, Basingstok

Croagh Wind Farm



03	01.07.20	Issued for Planning
02	12.06.20	Issued for Planning
01	19.11.19	Issued for Planning
00	29.08.19	Issued for Information
I/R	DATE	DESCRIPTION
_		



- The drilling rig and fluid handling units will be located on one side of the bridge and will be stored on double bunded 0.5mm PVC bunds which will contain any fluid spills and storm water run-off.
- Entry and exit pits (1m x 1m x 2m) will be excavated using an excavator, the excavated material will be temporarily stored within the works area and used for reinstatement or disposed of to a licensed facility.
- A 1m x 1m x 2m steel box will be placed in each pit. This box will contain any drilling fluid returns from the borehole.
- The drill bit will be set up by a surveyor, and the driller will push the drill string into the ground and will steer the bore path under the watercourse.
- A surveyor will monitor drilling works to ensure that the modelled stresses and collapse pressures are not exceeded.
- The drilled cuttings will be flushed back by drilling fluid to the steel box in the entry pit.
- Once the first pilot hole has been completed a hole-opener or back reamer will be fitted in the exit pit and will pull a drill pipe back through the bore to the entry side.
- Once all bore holes have been completed, a towing assembly will be set up on the drill and this will pull the ducting into the bore.
- The steel boxes will be removed, with the drilling fluid disposed of to a licensed facility.
- > The ducts will be cleaned and proven and their installed location surveyed.
- The entry and exit pits will be reinstated to the specification of ESB Networks and the landowner.

A joint bay or transition chamber will be installed on either side of the bridge following the horizontal directional drilling as per ESB requirements. The horizontal direction drilling method is illustrated in Figure 2-3 below.

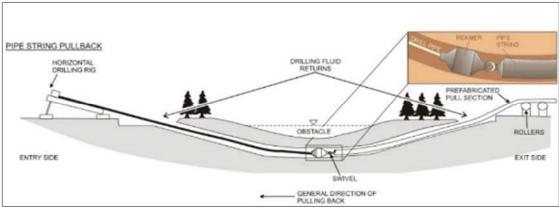


Figure 2-3 Horizontal Directional Drilling Methodology

# 2.4.15 **Proposed Demolition Works**

It is proposed to carry out partial demolition works on two agricultural buildings as part of the development of the proposed link road, between the R280 in Drumkeeran and L4282, for turbine component and abnormal load deliveries. A single bay on the northern side of the storage shed will be demolished and the masonry wall will be reconstructed at the end of the adjacent bay. A 6.9m length of the rear masonry wall of the livestock shed will be demolished and part of the gable sheeting will be removed. The central steel support structure will be relocated by one metre to increase the size of the opening at the rear of the livestock shed. This will be replaced with a corrugated, galvanised steel door. This detail is shown in. The demolition will be carried out using the following methodology.

- An inventory of the waste types that will be generated by the demolition works will be carried out.
- Any equipment or miscellaneous materials within northern bay of the storage shed will be removed.



- Removal of all fixtures and supporting structures.
- Removal of the roof sheeting over the northern bay of the storage shed and the section of gable sheeting at the rear of the livestock shed.
- Demolition will be completed by way of a mechanical excavator which will remove the structure and all associated groundworks.
- > The demolition of the masonry wall structures will be carried out by a mechanical excavator.
- > The majority of the waste generated by the demolition of the existing shed will consist of concrete rubble and stones from the existing wall structure, floor and foundations. This material will be segregated from all other waste components and sent by an authorised waste collector to an authorised waste recovery facility.
- The remaining volume of waste material will not be large enough to warrant any further segregation therefore, all waste generated during the demolition of the building will be deposited into a single skip that will be brought by a waste collector to an appropriately authorised facility.

# 2.5 **Decommissioning**

The wind turbines proposed as part of the Proposed Development are expected to have a lifespan of approximately 30 years. Following the end of their useful life, the wind turbines may be replaced with a new set of turbines, subject to planning permission being obtained, or the Proposed Development may be decommissioned fully. The onsite substation will remain in place as it will be under the ownership of the ESB and will form a permanent part of the national electricity grid.

Upon decommissioning of the Proposed Development, the wind turbines would be disassembled in reverse order to how they were erected. All above ground turbine components would be separated and removed off-site for recycling. Turbine foundations would remain in place underground and would be covered with earth and reseeded as appropriate. Leaving the turbine foundations in-situ is considered a more environmentally prudent option, as to remove that volume of reinforced concrete from the ground could result in significant environment nuisances such as noise, dust and/or vibration. Site roadways will be left in situ, for future forestry operations. The amenity and recreation infrastructure will also be left in-situ. Underground cables, including grid connection, will be removed and the ducting left in place. A decommissioning plan will be agreed with the local authorities three months prior to decommissioning the Proposed Development.

However, as noted in the Scottish Natural Heritage report (SNH) Research and Guidance on Restoration and Decommissioning of Onshore Wind Farms (SNH, 2013) reinstatement proposals for a wind farm are made approximately 30 years in advance, so within the lifespan of the wind farm, technological advances and preferred approaches to reinstatement are likely to change. According to the SNH guidance, it is therefore:

"best practice not to limit options too far in advance of actual decommissioning but to maintain informed flexibility until close to the end-of-life of the wind farm".



# ENVIRONMENTAL MANAGEMENT

#### 3.1 Introduction

This CEMP has been prepared and presented as a standalone document and includes all best practice measures required to construct the wind farm. The following sections give an overview of the drainage design, dust and noise control measures and a waste management plan for the site.

# 3.2 **Protecting Water Quality**

# 3.2.1 Good Environmental Management During Construction

Timing of works can strongly influence the potential for damaging the freshwater environment. Operations during wetter periods of the year pose a significantly greater risk of causing erosion and siltation, which can be particularly severe following major rainfall or snowmelt events. Traditionally, wind farm construction undertaken during the drier summer months would result in significantly less erosion and siltation. Construction activities in the hydrological buffer zones shall be avoided during or after prolonged rainfall or an intense rainfall event and work will cease entirely near watercourses when it is evident that water quality could potentially be impacted. Given that this site has an established drainage network and existing watercourse crossing points, there will be minimal impacts on watercourses.

# 3.2.2 Site Drainage Principles

The site drainage features have been outlined in Chapter 4, Section 4.7 of the EIAR in addition to the drainage design and management for the proposed development. The protection of the watercourses within and surrounding the site, and downstream catchments that they feed is of utmost importance in considering the most appropriate drainage proposals for the site of the proposed development. The proposed development's drainage design has therefore been proposed specifically with the intention of having no negative impact on the water quality of the site and its associated rivers and lakes, and consequently no impact on downstream catchments and ecological ecosystems.

No routes of any natural drainage features will be altered as part of the proposed development and turbine locations and associated new roadways were originally selected to avoid natural watercourses, and existing roads are to be used wherever possible. There will be no direct discharges to any natural watercourses, with all drainage waters being dispersed as overland flows. All discharges from the proposed works areas will be made over vegetation filters at an appropriate distance from natural watercourses. Buffer zones around the existing natural drainage features have been used to inform the layout of the Proposed Development.

#### 3.2.3 **Best Practice Guidance**

The drainage design has been prepared based on experience of the project team of other renewable energy sites in peat-dominated environments, and the number of best practice guidance documents.

There is no one guidance document that deals with drainage management and water quality controls for wind farms and other renewable energy developments. However, a selection of good practice approaches have been adopted in preparation of this CEMP, and these are taken from the various best practice guidance documents listed below. These relate to infrastructure and operational works on forested sites, forest road design, water quality controls for linear projects, forestry road drainage and



management of geotechnical risks. To achieve best practice in terms of water protection through construction management all drainage management is prepared in accordance with guidance contained in the following:

- > Forestry Commission (2004): Forests and Water Guidelines, Fourth Edition. Publ. Forestry Commission, Edinburgh;
- > Coillte (2009): Forest Operations & Water Protection Guidelines;
- Forest Service (Draft): Forestry and Freshwater Pearl Mussel Requirements Site Assessment and Mitigation Measures;
- Forest Service (2000): Forestry and Water Quality Guidelines. Forest Service, DAF, Johnstown Castle Estate, Co. Wexford;
- > Forest Service, (2000): Code of Best Forest Practice Ireland. Forest Service, DAF, Johnstown Castle Estate, Co. Wexford;
- COFORD (2004): Forest Road Manual Guidelines for the design, construction and management of forest roads;
- MacCulloch (2006): Guidelines for risk management of peat slips on the construction of low volume low cost roads over peat (Frank MacCulloch Forestry Civil Engineering Forestry Commission, Scotland);
- National Roads Authority (2005): Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes;
- > Wind Farm Development Guidelines for Planning Authorities (September 1996);
- Eastern Regional Fisheries Board: Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites;
- Inland Fisheries Ireland (2016): Guidelines on Protection of Fisheries During Construction Works Adjacent to Waters;
- Scottish Natural Heritage, 2010: Good Practice During Wind Farm Construction;
- PPG1 General Guide to Prevention of Pollution (UK Guidance Note);
- PPG5 Works or Maintenance in or Near Water Courses (UK Guidance Note);
- CIRIA Report No. C648 (2006): CIRIA (Construction Industry Research and Information Association) guidance on 'Control of Water Pollution from Linear Construction Projects';
- CIRIA Report Number C532 (2001): Control of water pollution from construction sites - Guidance for consultants and contractors.; and,
- Control of water pollution from linear construction projects -Technical guidance. CIRIA C648 London, 2006.

# 3.2.4 Site Drainage Design and Management

The proposed site drainage features for this site are outlined in Chapter 4, Section 4.7 of the EIAR. The following sections give an outline of drainage management arrangements in terms of pre-construction, construction and operational phases of the Proposed Development.

# 3.2.4.1 **Pre-Construction Drainage**

There is an existing drainage network across the site. There are four main watercourses which drain the proposed development site and there are numerous manmade drains that are in place predominately to drain the forestry plantations This existing drainage system will continue to function as it is during the pre-construction phase.

However, prior to commencement of works in sub-catchments across the site, main drain inspections will be competed to ensure ditches and streams are free from debris and blockages that may impede drainage. It is proposed to complete these inspections on a catchment by catchment basis as the construction works develop across the site, as works in all areas will not commence simultaneously.



#### 3.2.4.2 **Construction Phase Drainage**

The Project Hydrologist/Design Engineer will attend the site to set out and assist with micro-siting of proposed drainage controls as outlined in Chapter 4, Section 4.7 of the EIAR and shown in Appendix 4-5. The drainage system will be excavated and constructed in conjunction with the road and hard standing construction. Drains will be excavated and stilling ponds constructed to eliminate any suspended solids within surface water running off the site.

Best practice and practical experience on other similar projects suggests that in addition to the drainage plans that are included in the EIAR, there are additional site based decisions and plans that can only be made in the field through interaction between the Site Construction Manager, the Project Hydrologist and the Project Geotechnical Engineers. The mechanisms for interaction between these are outlined within Section 4 of this CEMP.

In relation to decisions that are made on site it is important to stress that these will be implemented in line with the associated drainage controls and mitigation measures outlined in Section 6 below, and to ensure protection of all watercourses.

#### 3.2.4.3 **Operational Phase Drainage**

The project hydrologist will inspect and review the drainage system after construction has been completed to provide guidance on the requirements of an operational phase drainage system. This operational phase drainage system will have been installed during the construction phase in conjunction with the road and hardstanding construction work as described below:

- > Interceptor drains will be excavated up-gradient of all proposed infrastructure to collect clean surface runoff, in order to minimise the amount of runoff reaching areas where suspended sediment could become entrained. It will then be directed to areas where it can be re-distributed over the ground by means of a level spreader.
- Swales/road side drains will be excavated to intercept and collect runoff from access roads and hardstanding areas of the site, likely to have entrained suspended sediment, and channel it to stilling ponds for sediment settling;
- Check dams will be put in place at regular intervals along interceptor drains and swales/roadside drains in order to reduce flow velocities and therefore minimise erosion within the system during storm rainfall events; and,
- Stilling ponds/settlement ponds, emplaced downstream of swales and roadside drains, will buffer volumes of runoff discharging from the drainage system during periods of high rainfall, by retaining water until the storm hydrograph has receded, thus reducing the hydraulic loading to watercourses. The stilling ponds will be sized according to the size of the area they will be receiving water from, but will be sufficiently large to accommodate peak flows storm events. Inspection and maintenance of all settlement ponds, along with the entire drainage network, will be ongoing through the construction period.

# 3.2.4.4 Preparative Site Drainage Management

All materials and equipment necessary to implement the drainage measures outlined above will be brought on-site in advance of any works commencing.

An adequate quantity of straw bales, clean stone, terram, stakes, etc. will be kept on site at all times to implement the drainage design measures as necessary. The drainage measures outlined in the above will be installed prior to, or at the same time as the works they are intended to drain.



#### 3.2.4.5 Pre-emptive Site Drainage Management

The works programme for the groundworks part of the construction phase of the project will also take account of weather forecasts and predicted rainfall. Large excavations and movements of overburden or large-scale overburden or soil stripping will be suspended or scaled back if heavy rain is forecast. The extent to which works will be scaled back or suspended will relate directly to the amount of rainfall forecast and the nature and location of the works.

#### 3.2.4.6 Reactive Site Drainage Management

The final drainage design prepared for the site has provided for reactive management of drainage measures. The effectiveness of drainage measures designed to minimise runoff entering works areas and capture and treat potentially silt-laden water from the works areas, will be monitored continuously by the Environmental Clerk of Works (ECoW) on-site. The ECoW or supervising hydrologist will respond to changing weather, ground or drainage conditions on the ground as the project proceeds, to ensure the effectiveness of the drainage design is maintained in so far as is possible. This may require the installation of additional check dams, interceptor drains or swales as deemed necessary on-site. The drainage design may have to be modified on the ground as necessary, and the modifications will draw on the various features outlined above in whatever combinations are deemed to be most appropriate to the situation on the ground at a particular time.

In the unlikely event that works are giving rise to siltation of watercourses, the ECoW or supervising hydrologist will stop all works in the immediate area around where the siltation is evident. The source of the siltation will be identified and additional drainage measures such as those outlined above will be installed in advance of works recommencing.

#### 3.2.5 **Borrow Pit Drainage**

While surface water will be contained in the borrow pit area, the design proposal is to control the level of water in the borrow pit area by creating a single point outlet from the basin-like area that will ensure the water does not overtop the pit area. Run-off from the proposed borrow pit areas will be controlled via a single outlet that will be installed at the edge of the borrow pit. The single outfall point will be constructed to manage runoff from the borrow pit and its immediate surrounds. Interceptor drains will already have been installed upgradient of the borrow pit area before any extraction begins.

During the construction phase of the project, it will be necessary to keep the borrow pit area free of standing water while rock is still being extracted. This will be achieved as necessary by using a mobile pump, which will pump water into the same series of drains, settlement ponds and level spreader, which will receive the water from the single outlet.

# 3.2.6 Peat and Spoil Repository Area Drainage

During the initial placement of peat and subsoil at repository areas, silt fences, straw bales and biodegradable matting will be used to control surface water runoff from the repository areas. 'Siltbuster' treatment trains will be employed if previous treatment is not to a high quality.

Drainage from the repository areas will ultimately be routed to an oversized swale and a number of stilling ponds pond and a 'Siltbuster' with appropriate storage and settlement designed for a 1 in 100 year 6 hour return period before being discharged to the on-site drains.

The repository areas will be sealed with a digger bucket and vegetated as soon possible to reduce sediment entrainment in runoff. Once re-vegetated and stabilised peat/subsoil reinstatement areas will no longer be a potential source of silt laden runoff



# 3.2.7 Cable Trench Drainage

Cable trenches are typically developed in short sections (c. 150m), thereby minimising the amount of ground disturbed at any one time and minimising the potential for drainage runoff to pick up silt or suspended solids. Each short section of trench is excavated, ducting installed and bedded, and backfilled with the appropriate materials, before work on the next section commences.

To efficiently control drainage runoff from cable trench works areas, excavated material is stored on the upgradient side of the trench. Should any rainfall cause runoff from the excavated material, the material is contained in the downgradient cable trench. Excess subsoil is removed from the cable trench works area immediately upon excavation, and in the case of the proposed development, used for landscaping and reinstatements of other areas elsewhere on site.

On steeper slopes, silt fences, as detailed in Section 4.7 of the EIAR will be installed temporarily downgradient of the cable trench works area, or on the downhill slope below where excavated material is being temporarily stored to control run-off.

# 3.2.8 Refuelling, Fuel and Hazardous Materials Storage

The following mitigation measures are proposed to avoid release of hydrocarbons at the site:

- Minimal refuelling or maintenance of construction vehicles or plant will take place on site. Off-site refuelling should occur at a controlled fuelling station;
- On-site refuelling will take place using a mobile double skinned fuel bowser. The fuel bowser, a double-axel custom-built refuelling trailer will be re-filled off site, and will be towed around the site by a 4x4 jeep to where machinery is located. It is not practical for all vehicles to travel back to a single refuelling point, given the size of the cranes, excavators, etc. that will be used during the construction of the wind farm. The 4x4 jeep will also carry fuel absorbent material and pads in the event of any accidental spillages. The fuel bowser will be parked on a level area in the construction compound when not in use. Only designated trained and competent operatives, with a permit to refuel, will be authorised to refuel plant on site. Mobile measures such as drip trays and fuel absorbent mats will be used during all refuelling operations.
- > Fuels volumes stored on site should be minimised. The fuel storage areas, within the temporary construction compounds, will be bunded appropriately for the fuel storage volume for the time period of the construction and fitted with a storm drainage system and an appropriate oil interceptor;
- The electrical substation compound will be bunded appropriately to the volume of oils likely to be stored, and to prevent leakage to groundwater or surface water. The bunded area will be fitted with a storm drainage system and an appropriate oil interceptor;
- The plant used will be regularly inspected for leaks and fitness for purpose; and,
- An emergency plan for the construction phase to deal with accidental spillages will be developed (refer to Section 5). Spill kits will be available to deal with any accidental spillage in and outside the refuelling area.

# 3.2.9 Tree Felling

Tree felling to facilitate the Proposed Development will not be undertaken simultaneously with construction groundworks. Keyhole felling to facilitate construction works will take place prior to groundworks commencing.



Water protection measures will reduce the risk of entrainment of suspended solids and nutrient release in surface watercourses. These measures are derived from best practice guidance documents as outlined in Section 9.5.3.1 of the EIAR. The water protection measures to be adopted during felling operations are set out as follows:

- Machine combinations (i.e. hand-held or mechanical) will be chosen which are most suitable for ground conditions at the time of felling, and which will minimise soils disturbance;
- > Trees will be cut manually inside the 50m buffer and using machinery to extract whole trees only;
- Checking and maintenance of roads and culverts will be on-going through any felling operation. No tracking of vehicle through watercourses will occur, as vehicles will use road infrastructure and existing watercourse crossing points. Where possible, existing drains will not be disturbed during felling works;
- Ditches which drain from the proposed area to be felled towards existing surface watercourses will be blocked, and temporary silt traps will be constructed. No direct discharge of such ditches to watercourses will occur. Drains and sediment traps will be installed during ground preparation. Collector drains will be excavated at an acute angle to the contour (~0.3%-3% gradient), to minimise flow velocities. Main drains to take the discharge from collector drains will include water drops and rock armour, as required, where there are steep gradients, and should avoid being placed at right angles to the contour;
- Sediment traps will be sited in drains downstream of felling areas. Machine access will be maintained to enable the accumulated sediment to be excavated. Sediment will be carefully disposed of in the peat disposal areas. Where possible, all new silt traps will be constructed on even ground and not on sloping ground;
- In areas particularly sensitive to erosion or where felling inside the 50 metre buffer is required, it will be necessary to install double or triple sediment traps.
- Double silt fencing will also be put down slope of felling areas which are located inside the 50 metre buffer zone;
- All drainage channels will taper out before entering the aquatic buffer zone. This ensures that discharged water gently fans out over the buffer zone before entering the aquatic zone, with sediment filtered out from the flow by ground vegetation within the zone. On erodible soils, silt traps will be installed at the end of the drainage channels, to the outside of the buffer zone;
- > Drains and silt traps will be maintained throughout all felling works, ensuring that they are clear of sediment build-up and are not severely eroded. Correct drain alignment, spacing and depth will ensure that erosion and sediment build-up are minimized and controlled;
- Brash mats will be used to support vehicles on soft ground, reducing peat and mineral soils erosion and avoiding the formation of rutted areas, in which surface water ponding can occur. Brash mat renewal should take place when they become heavily used and worn. Provision should be made for brash mats along all off-road routes, to protect the soil from compaction and rutting. Where there is risk of severe erosion occurring, extraction should be suspended during periods of high rainfall;
- > Timber will be stacked in dry areas, and outside a local 50 metre watercourse buffer. Straw bales and check dams to be emplaced on the down gradient side of timber storage/processing sites;
- Works will be carried out during periods of no, or low rainfall, in order to minimise entrainment of exposed sediment in surface water run-off;
- Checking and maintenance of roads and culverts will be on-going through the felling operation;
- No crossing of streams by machinery will be permitted and only travel perpendicular to and away from stream will be allowed;
- Refuelling or maintenance of machinery will not occur within 100m of a watercourse. Mobile bowser, drip kits, qualified personnel will be used where refuelling is required;
- A permit to refuel system will be adopted at the site; and,



> Branches, logs or debris will not be allowed to build up in aquatic zones. All such material will be removed when harvesting operations have been completed, but care will be taken to avoid removing natural debris deflectors.

Table 3-1 Minimum Buffer Zone Widths (Forest Service, 2000)

Average slope leadin	g to the aquatic zone	Buffer zone width on either side of the aquatic zone	Buffer zone width for highly erodible soils
	(0 - 15%)	10 m	15 m
Moderate			
	(15 - 30%)	15 m	20 m
Steep	,		
	(>30%)	20 m	25 m
Very steep			

#### 3.2.9.1 Forestry Felling Drainage Management

Before the commencement of any felling works, an Environmental Clerk of Works (ECoW) shall be appointed to oversee the keyhole and extraction works. The ECoW shall be experienced and competent, and shall have the following functions and operate their record using a Schedule of Works Operation Record (SOWOR), as proposed in the planning application:

- Attend the site for the setup period when drainage protection works are being installed, and be present on site during the remainder of the forestry keyhole felling works.
- Prior to the commencement of works, review and agree the positioning by the Operator of the required Aquatic Buffer Zones (ABZs), silt traps, silt fencing (see below), water crossings and onsite storage facilities for fuel, oil and chemicals (see further below).
- > Be responsible for preparing and delivering the Environmental Tool Box Talk (TBT) to all relevant parties involved in site operations, prior to the commencement of the works
- Conduct daily and weekly inspections of all water protection measures and visually assess their integrity and effectiveness in accordance with Section 3.4 (Monitoring and Recording) and Appendix 3 (Site Monitoring Form (Visual Inspections)) of the Forestry & Freshwater Pearl Mussel Requirements.
- Take representative photographs showing the progress of operation onsite, and the integrity and effectiveness of the water protection measures.
- Collect water samples for analysis by a 3rd party accredited laboratory, adhering to the following requirements:
  - Surface water samples shall be collected upstream and downstream of the keyhole felling site at suitable sampling locations.
  - Sampling shall be taken from the stream / river bank, with no in-stream access permitted.
  - The following minimum analytical suite shall be used: pH, Electrical Conductivity, Total Suspended Solids, Biochemical Oxygen Demand, Total Phosphorus, Ortho-Phosphate, Total Nitrogen, and Ammonia.
- Review of operator's records for plant inspections, evidence of contamination and leaks, and drainage checks made after extreme weather conditions.
- > Prepare and maintain a contingency plan.
- Suspend work where potential risk to water from siltation and pollution is identified, or where operational methods and mitigation measures are not specified or agreed.
- Prepare and maintain a Water Protection Measure Register. This document is to be updated weekly by the ECoW.



#### 3.2.10 Cement Based Products Control Measures

The following mitigation measures are proposed to avoid release of cement leachate from the site:

- No batching of wet-cement products will occur on site;
- Ready-mixed supply of wet concrete products and where possible, emplacement of pre-cast elements, will take place. Where possible pre-cast elements for culverts and concrete works will be used;
- No washing out of any plant used in concrete transport or concreting operations will be allowed on-site;
- Where concrete is delivered on site, only chute cleaning will be permitted, using the smallest volume of water possible. No discharge of cement contaminated waters to the construction phase drainage system or directly to any artificial drain or watercourse will be allowed.
- Use weather forecasting to plan dry days for pouring concrete;
- Ensure pour site is free of standing water and plastic covers will be ready in case of sudden rainfall event;
- The small volume of water that will be generated from washing of the concrete lorry's chute will be directed into a concrete washout area, typically built using straw bales and lined with an impermeable membrane. The areas are generally covered when not in use to prevent rainwater collecting. In periods of dry weather, the areas can be uncovered to allow much of the water to be lost to evaporation. At the end of the concrete pours, any of the remaining liquid contents is tankered off-site. Any solid contents that will have been cleaned down from the chute will have solidified and can be broken up and disposed of along with other construction waste (See Section 3.4 below).

The 50m wide natural watercourse buffer zone and 20 m existing artificial drainage buffer will be emplaced for the duration of the construction phase. No construction activity will occur within the buffer zone with the exception of bridge and culvert construction. The buffer zone will:

- Prevent any cement based products accidentally entrained in the construction phase drainage system entering directly into watercourses, achieved in part by ending drain discharge outside the 50m buffer zone and allowing percolation across the vegetation of the buffer zone;
- Provide a buffer against accidental direct run-off to surface waters by any pollutants, or by pollutants entrained in surface water run-off.

# 3.2.11 **Peat Stability Management**

Peat instability or failure refers to a significant mass movement of a body of peat that would have an adverse impact on wind farm development and the surrounding environment. Peat failure excludes localised movement of peat that could occur below an access road, creep movement or erosion type events. In the absence of appropriate mitigation, the consequence of peat failure at the study area may result in:

- Death or injury to site personnel;
- > Damage to machinery;
- Damage or loss of access tracks;
- Drainage disrupted;
- Site works damaged or unstable;
- > Contamination of watercourses, water supplies by sediment particulates; and,
- Degradation of the environment.



# 3.2.12 **General Recommendations for Good Construction Practice**

Based on the recommendations and control measures given in the FT Peat Stability Assessment (Appendix 8-1 of the EIAR) report being strictly adhered to during construction and the detailed stability assessment carried out for the peat slopes which showed that the site has an acceptable margin of safety.

The risk assessment at each turbine location identified a number of control measures to further reduce the potential risk of peat failure. Access roads to turbines will be subject to the same relevant control measures that apply to the nearest turbine as detailed in the FT Peat Stability Assessment Report.

The following measures which will be implemented during the construction phase of the project will assist in the management of the risks for this site.

- Appointment of experienced and competent contractors;
- The site will be supervised by experienced and qualified personnel;
- Sufficient time will be alloacted for the project to ensure that the potential for initiating peat movement is minimised ( (be aware that decreasing the construction time has the potential to increase the risk of initiating a peat movement);
- Prevent undercutting of slopes and unsupported excavations;
- Maintain a managed robust drainage system;
- Prevent placement of loads/overburden on marginal ground as detailed in the peat stability assessment report;
- Set up, maintain and report findings from monitoring systems;
- Ensure construction method statements are followed or where agreed modified/ developed; and,
- Revise and amend the Geotechnical Risk Register as construction progresses.

#### 3.2.13 **Dust Control**

Construction dust can be generated from many on-site activities such as excavation and backfilling. The extent of dust generation will depend on the type of activity undertaken, the location, the nature of the dust, i.e. soil, sand, peat, etc. and the weather. In addition, dust dispersion is influenced by external factors such as wind speed and direction and/or, periods of dry weather. Construction traffic movements also have the potential to generate dust as they travel along the haul route.

Proposed measures to control dust include:

- Any site roads with the potential to give rise to dust will be regularly watered, as appropriate, during dry and/or windy conditions;
- The designated public roads outside the site and along the main transport routes to the site will be regularly inspected by the ECoW for cleanliness, and cleaned as necessary;
- Material handling systems and material storage areas will be designed and laid out to minimise exposure to wind;
- Water misting or bowsers will operate on-site as required to mitigate dust in dry weather conditions;
- The transport of soils or other material, which has significant potential to generate dust, will be undertaken in tarpaulin-covered vehicles where necessary;
- All construction related traffic will have speed restrictions on un-surfaced roads to 20 kph;
- Daily inspection of construction sites to examine dust measures and their effectiveness.



- When necessary, sections of the haul route will be swept using a truck mounted vacuum sweeper; and,
- All vehicles leaving the construction areas of the site will pass through a wheel washing area prior to entering the local road network.

#### 3.2.14 Noise Control

The operation of plant and machinery, including construction vehicles, is a source of potential impact that will require mitigation at all locations within the site. Proposed measures to control noise include:

- Diesel generators will be enclosed in sound proofed containers to minimise the potential for noise impacts;
- Plant and machinery with low inherent potential for generation of noise and/or vibration will be selected. All construction plant and equipment to be used on-site will be modern equipment and will comply with the European Communities (Construction Plant and Equipment) (Permissible Noise Levels) Regulations, 1988 (as amended);
- Regular maintenance of plant will be carried out in order to minimise noise emissions. Particular attention will be paid to the lubrication of bearings and the integrity of silencers;
- All vehicles and mechanical plant will be fitted with effective exhaust silencers and maintained in good working order for the duration of the works;
- Compressors will be of the "sound reduced" models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use and all ancillary pneumatic tools shall be fitted with suitable silencers;
- Machines, which are used intermittently, will be shut down during those periods when they are not in use;
- Training will be provided by the ECoW to drivers to ensure smooth machinery operation/driving, and to minimise unnecessary noise generation; and,
- Local areas of the haul route will be condition monitored and maintained, if necessary.

## 3.3 Invasive Species Management

During field surveys, a search for Invasive Alien Species (IAS) listed under the Third Schedule of the European Communities Regulations 2011 (S.I. 477 of 2015) was conducted. A number of Japanese knotweed (*Fallopia japonica*) plants were recorded adjacent to an existing forestry road, approximately 200m east of Turbine 2 (Grid Ref: E184107 N324067) and in close proximity to the proposed access road, by existing agricultural buildings to the east of the site (Grid Ref: E 190620 N 324296).

No additional species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011 were recorded during the survey.

An invasive species management plan for the site will prevent the introduction or spread of any invasive species within the footprint of the works. An invasive species management plan, will set out best practice control methods as summarised in the following sections.

#### 3.3.1 Site Management

Careful preparation of the site and planning of the works is crucial to successful treatment of invasive species. The following list of guidelines, which is not exhaustive, shall be followed by all on-site personnel. Only those who have been inducted into biosecurity measures on-site may enter the contaminated zones within the works areas. Should any risk of contaminated material escaping be



observed by the site supervisor, the management plan for the site must be amended by an appropriately qualified person to mitigate against the risk.

## 3.3.2 **Establishing Good Site Hygiene**

- A risk assessment and method statement must be provided by the Contractor prior to commencing works.
- Fences will be erected around areas of infestation, as confirmed by test pits, and warning signs shall be erected.
- A designated wash-down area will be created, where power-washed material from machinery can be contained, collected and disposed of with other contaminated material. This area will contain a washable membrane or hard surface.
- Stockpile areas will be chosen to minimise movement of contaminated soil.
- > Stockpiles will be marked and isolated.
- Contaminated areas which will not be excavated will be protected by a root barrier membrane if they are likely to be disturbed by machinery. Root barrier membranes will be protected by a layer of sand above and below and topped with a layer of hardcore.
- The use of vehicles with caterpillar tracks within contaminated areas will be avoided to minimise the risk of spreading contaminated material.
- An ECoW/suitably qualified ecologist will be on site to monitor and oversee the implementation of invasive species management plans.

Plant and equipment which is operated within an area for the management of materials in contaminated areas should be decontaminated prior to relocating to a different works area. The decontamination procedures should take account of the following:

- Personnel may only clean down if they are familiar with the plant and rhizome material and can readily identify it.
- Decontamination will only occur within designated wash-down areas.
- **>** Vehicles will be cleaned using stiff-haired brush and pressure washers, paying special attention to any areas that might retain rhizomes e.g. wheel treads and arches.
- All run-off will be isolated and treated as contaminated material. This will be disposed of in already contaminated areas.

## 3.4 Waste Management

This section of the CEMP provides a waste management plan (WMP) which outlines the best practice procedures during the demolition, excavation and construction phases of the project. The WMP will outline the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage of construction of the proposed development. Disposal of waste will be seen as a last resort.

## 3.4.1 **Legislation**

The Waste Management Act 1996 and its subsequent amendments provide for measures to improve performance in relation to waste management, recycling and recovery. The Act also provides a regulatory framework for meeting higher environmental standards set out by other national and EU legislation.

The Act requires that any waste related activity has to have all necessary licenses and authorisations. It will be the duty of the Waste Manager on the site of the development to ensure that all contractors hired to remove waste from the site have valid Waste Collection Permits. It will then be necessary to ensure that the waste is delivered to a licensed or permitted waste facility. The hired waste contractors



and subsequent receiving facilities must adhere to the conditions set out in their respective permits and authorisations.

The Department of the Environment provides a document entitled, 'Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects' (2006) document was referred to throughout the process of completing this WMP.

#### 3.4.2 Waste Management Hierarchy

The waste management hierarchy sets out the most efficient way of managing waste in the following order:

#### Prevention and Minimisation:

The primary aim of the WMP will be to prevent and thereby reduce the amount of waste generated at each stage of the project.

#### Reuse of Waste:

Reusing as much of the waste generated on site as possible will reduce the quantities of waste that will have to be transported off site to recovery facilities or landfill.

#### Recycling of Waste:

There are a number of established markets available for the beneficial use of Construction and Demolition waste such as using waste concrete as fill for new roads.

At all times during the implementation of the WMP, disposal of waste to landfill will be considered only as a last resort.

#### 3.4.3 **Demolition Phase Waste Management**

Prior to the commencement of any demolition works, as described in Section 2.4.14 above, a full audit of waste material that will be generated will be carried out. A list of expected waste types that may be generated has been drawn up and the European Waste Catalogue Codes pertaining to each waste type is included in Table 3-2. The lists have been prepared following a visit to the proposed development site and inspection of the existing buildings.

Table 3-2 Expected waste types arising from the Demolition Phase

Materials type	Example	EWC Code
Cables	Electrical wiring	17 04 11
Concrete	Surfacing, flooring material	17 01 01
Metals	Steel roof coverings	17 04 07
Mixture of inert material	Sand, stones, plaster, rock	17 01 07
Plastic	PVC frames, electrical fittings	17 02 03
Soil & Stones	Overburden, soil, subsoil	17 05 04



Wood	Misc.	17 02 01

The majority of the waste generated by the demolition works will consist of concrete rubble and stones from the existing wall structures, floors and foundations. This material will be segregated from all other waste components and sent by an authorised waste collector to an authorised waste recovery facility. The remaining volume of waste material will not be large enough to warrant any further segregation, therefore, all waste generated during the demolition of the building will be deposited into a single skip. This waste material will be transferred to a Materials Recovery Facility (MRF) by a fully licensed waste contractor where the waste will be sorted into individual waste streams for recycling, recovery or disposal.

## 3.4.4 Construction Phase Waste Management

#### 3.4.4.1 **Description of the Works**

The construction of the development will involve the construction of 10 no. turbines, new and upgraded site access roads, internal cabling and grid connection, substation and control buildings and all associated infrastructure.

The turbines will be manufactured off site and delivered to site where on site erection will occur.

The turbine foundations will consist of stone from the on-site borrow pit and a concrete base which will contain reinforcing steel. These concrete foundations will be shuttered with steel formwork specifically designed for the works and re-usable off site on similar projects.

The construction of the substation will comprise of a concrete foundation with concrete masonry blocks and a timber roof structure with roof tile or slate covering. The roof structure will be made up of prefabricated roof trusses manufactured off site to minimise timber cutting on site.

The site roads will be constructed with rock won from the on-site borrow pit.

The waste types arising from the construction phase of the development are outlined in Table 3-3 below.

Table 3-3 Expected waste types arising during the Construction Phase

Table 8 o Expected waste types arising to		
Material Type	Example	EWC Code
Cables	Electrical wiring	17 04 11
Cardboard	Boxes, cartons	15 01 01
Composite packaging	Containers	15 01 05
	Copper, aluminium, lead, iron	
Metals	and steel	17 04 07
	Sand, stones, plaster, rock,	
Inert materials	blocks	17 01 07
	Daily canteen waste from	
	construction workers,	
Mixed municipal waste	miscellaneous	20 03 01
-		
Plastic	PVC frames, electrical fittings	17 02 03
Plastic packaging	Packaging with new materials	15 01 02



Material Type	Example	EWC Code
Tiles and ceramics	Slates and tiles	17 01 03
Wooden packaging	Boxes, pallets	15 01 03

Hazardous wastes that may occur on site during the construction phase of the development may include oil, diesel fuel, chemicals, paints, preservatives etc. All hazardous wastes will be stored in bunded containers/areas before being collected by an authorised waste contractor and brought to an EPA licensed waste facility. As mentioned above, hazardous wastes will be kept separate from non-hazardous wastes that contamination does not occur.

## 3.4.4.2 Waste Arisings and Proposals for Minimisation, Reuse and Recycling of Construction Waste

Construction waste will arise on the project mainly from excavation and unavoidable construction waste including material surpluses and damaged materials and packaging waste.

Appropriate measures should be taken to ensure excess waste is not generated during construction, including;

- Ordering of materials will be on an 'as needed' basis to prevent over supply to site. Co-ordination is required with suppliers enabling them to take/buy back surplus stock.
- Purchase of materials pre-cut to length to avoid excess scrap waste generated on site.
- Request that suppliers use least amount of packaging possible on materials delivered to the site.
- Ensuring correct storage and handling of goods to avoid unnecessary damage that would result in their disposal
- **Ensuring correct sequencing of operations.**
- Use reclaimed materials in the construction works.

Hazardous waste will be kept separate from all other construction waste to prevent contamination and removed appropriately.

## 3.4.4.3 Waste Arising from Construction Activities

All waste generated on site will be contained in waste skips at a waste storage area on site. This waste storage area will be kept tidy with skips clearly labelled to indicate the allowable material to be disposed of therein.

The waste generated from the turbine erection will be limited to the associated protective covers which are generally reusable. Considering the specialist nature of this packaging material the majority will be taken back by suppliers for their own reuse. Any other packaging waste generated from the turbine supply will be deposited into the on-site skips and subsequently transferred to the MRF.

It is not envisaged that there will be any waste material arising from the materials used to construct the site roads as only the quantity of stone necessary will be sourced from local quarries and brought on site on an 'as needed' basis.

Site personnel will be instructed at induction that no under no circumstances can waste be brought to site for disposal in the on-site waste skip. It will also be made clear that the burning of waste material on site is forbidden.



#### 3.4.5 Waste Arising from Decommissioning

The design life of the wind farm is 30 years after which time a decision will be made to determine whether or not the turbines will be replaced by new turbines or if decommissioning will occur. The lengthy time frame between the completion of the construction phase and decommissioning will result in the only materials remaining on site at that time being infrastructural material such as the turbine foundations, turbines and the granular material used to construct roads. When the site is decommissioned, cranes will disassemble each turbine tower and all equipment. The associated components will be removed from site for re-use, recycling or waste disposal. Any structural elements that are not suitable for recycling will be disposed of in an appropriate manner, as described in Section 3.4.3 above. All lubrication fluids will be drained down and put aside for appropriate collection, storage, transport and disposal. Any materials which cannot be re-used or recycled will be disposed of by an appropriately licenced contractor to an appropriately licensed waste facility.

The waste types arising from the decommissioning of the development are outlined in Table 3-4 below.

Table 3-4 Expected waste types arising during the Decommissioning Phase

Material Type	Example	EWC Code
Cables	Electrical wiring	17 04 11
	Copper, aluminium, lead, iron	
Metals	and rebar	17 04 07
T , 1		17 01 07
Inert materials	Crushed stone, concrete	17 01 07

#### 3.4.5.1 **Reuse**

Many construction materials can be reused a number of times before they have to be disposed of:

- Concrete can be reused as aggregate for roads cable trench backfilling material.
- Plastic packaging etc. can be used to cover materials on site or reused for the delivery of other materials.
- Excavated peat can be reused for reinstatement of the areas around turbine foundations and adjacent to site roads.

#### 3.4.5.2 **Recycling**

If a certain type of construction material cannot be reused onsite, then recycling is the most suitable option. The opportunity for recycling on site will be restricted to the associated packaging from the wind turbines.

All waste that is produced during the construction phase, including dry recyclables, will be deposited in the on-site skip initially and sent for subsequent segregation at a remote facility. The anticipated volume of all waste material to be generated at the development is low which provides the justification for adopting this method of waste management.

### 3.4.5.3 **Implementation**

#### 3.4.5.3.1 Roles and Responsibilities for Waste Management

Prior to the commencement of the development, a Construction Waste Manager will be appointed by the Contractor. The Construction Waste Manager will be in charge of the implementation of the objectives of the plan, ensuring that all hired waste contractors have the necessary authorisations and that the waste management hierarchy is adhered to. The person nominated must have sufficient



authority so that they can ensure everyone working on the development adheres to the management plan.

#### 3.4.5.3.2 **Training**

It is important for the Construction Waste Manager to communicate effectively with colleagues in relation to the aims and objectives of the waste management plan. All employees working on site during the construction phase of the project will be trained in materials management and thereby, should be able to:

- Distinguish reusable materials from those suitable for recycling;
- **Ensure maximum segregation at source**;
- Co-operate with site manager on the best locations for stockpiling reusable materials;
- Separate materials for recovery; and
- Identify and liaise with waste contractors and waste facility operators.

#### 3.4.5.3.3 Record Keeping

The WMP will provide systems that will enable all arisings, movements and treatments of construction waste to be recorded. This system will enable the contractor to measure and record the quantity of waste being generated. It will highlight the areas from which most waste occurs and allows the measurement of arisings against performance targets. The WMP can then be adapted with changes that are seen through record keeping.

The fully licensed waste contractor employed to remove waste from the site will be required to provide documented records for all waste dispatches leaving the site. Each record will contain the following:

- Consignment Reference Number
- Material Type(s) and EWC Code(s)
- Company Name and Address of Site of Origin
- Trade Name and Collection Permit Ref. of Waste Carrier
- Trade Name and Licence Ref. of Destination Facility
- Date and Time of Waste Dispatch
- Registration no. of Waste Carrier vehicle
- Weight of Material
- Signature of Confirmation of Dispatch detail
- Date and Time of Waste Arrival at Destination
- Site Address of Destination Facility

#### 3.4.5.4 Waste Management Plan Conclusion

The WMP will be properly adhered to by all staff involved in the project which will be outlined within the induction process for all site personnel. The waste hierarchy should always be employed when designing the plan to ensure that the least possible amount of waste is produced during the construction phase. Reuse of certain types of construction wastes will cut down on the cost and requirement of raw materials therefore further minimising waste levels.

This WMP has been prepared to outline the main objectives that are to be adhered to in the final WMP to be completed in the event planning permission is granted for the proposed development.



# 4. ENVIRONMENTAL MANAGEMENT IMPLEMENTATION

## 4.1 Roles and Responsibilities

The Site Supervisor/Construction Manager and/or Environmental Clerk of Works are the project focal point relating to construction-related environmental issues.

In general, the Environmental Clerk of Works will maintain responsibility for monitoring the works and Contractors/Sub-contractors from an environmental perspective. The Environmental Clerk of Works will act as the regulatory interface on environmental matters by reporting to and liaising with Letrim County Council, Sligo County Council and other statutory bodies as required.

The Environmental Clerk of Works will report directly to the Site Supervisor/Construction Manager. An Environmental Clerk of Works or Project Ecologist, Project Hydrologist, Project Archaeologist and Project Geotechnical engineer will visit the site regularly and report to the Site Environmental Office. This structure provides a "triple lock" review/interaction by external specialists. An organogram structure for the construction stage is as follows:

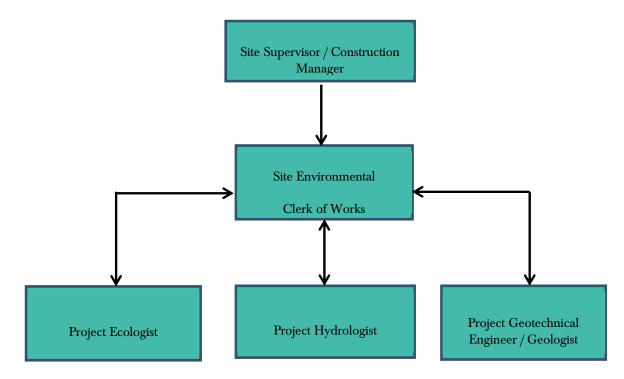


Figure 4-1 Site Management Chain of Command

Any requirement of the granted permission, for the works to be supervised by an engineer with professional indemnity insurance, who upon completion of the works, including site stability, shall certify the said works, will be adhered to. Such an engineer will be appointed to oversee and supervise the construction phase of the project.

## **4.1.1** Wind Farm Construction Manager/Site Supervisor

The Site Supervisor/Construction Manager will have overall responsibility for the organisation and execution of all related environmental activities as appropriate, in accordance with regulatory and



project environmental requirements. The duties and responsibilities of the Site Supervisor/Construction Manager will include:

- Ensure that all works are completed safely and with minimal environmental risk;
- Approve and implement the Project CEMP and supporting environmental documentation, and ensure that all environmental standards are achieved during the construction phase of the project;
- Take advice from the Environmental Clerk of Works on legislation, codes of practice, guidance notes and good environmental working practice relevant to their work;
- > Ensure compliance through audits and management site visits;
- Ensure timely notification of environmental incidents; and,
- Ensure that all construction activities are planned and performed such that minimal risk to the environment is introduced.

#### 4.1.2 Environmental Clerk of Works

The main contractor will be required to engage a qualified Environmental Engineer, Environmental Scientist, or equivalent, with experience in wind farm construction to fulfil the role of Environmental Clerk of Works, and to monitor all site works and to ensure that methodologies and mitigation are followed throughout construction to avoid negatively impacting on the receiving environment.

The Environmental Clerk of Works will report to the Site Supervisor/Construction Manager. The responsibilities and duties of the Environmental Clerk of Works will include the following:

- Update of the CEMP as required, and supporting environmental documentation and review/approval of contractor method statements;
- Undertake inspections and reviews to ensure the works are carried out in compliance with the CEMP;
- Monitor the implementation of the CEMP, particularly all proposed/required Environmental Monitoring;
- Generate environmental reports as required to show environmental data trends and incidents and ensure environmental records are maintained throughout the construction period;
- Advise site management/contractor/sub-contractors on:
  - Prevention of environmental pollution and improvement to existing working methods;
  - o Changes in legislation and legal requirements affecting the environment;
  - Suitability and use of plant, equipment and materials to prevent pollution;
  - Environmentally sound methods of working and systems to identify environmental hazards;
- Ensure the specified mitigation measures are initiated and adhered to during the construction phase;
- Liaise with Project Ecologist, Project Hydrologist and Project Geotechnical Engineer to ensure regular site visits and audits/inspections are completed;
- Ensure adequate arrangements are in place for site personnel to identify potential environmental incidents:
- Ensure that details of environmental incidents are communicated in a timely manner to the relevant regulatory authorities, initially by phone and followed up as soon as is practicable by e-mail;
- Support the investigation of incidents of significant, potential or actual environmental damage, and ensure corrective actions are carried out, recommend means to prevent recurrence and communicate incident findings to relevant parties; and,



Identify environmental training requirements and arrange relevant training for all levels of site based staff/workers.

The level, detail and frequency of reporting expected from the Environmental Clerk of Works for the Construction Manager, developer's project manager, and any Authorities or other Agencies, will be agreed by all parties prior to commencement of construction, and may be further adjusted as required during the course of the project.

#### 4.1.3 **Project Ecologist**

The Project Ecologist will report to the Environmental Clerk of Works and is responsible for the protection of sensitive habitats and species encountered during the construction phase of the wind farm. The Project Ecologist will not be full time on site but will visit the site at least once a month during construction.

The responsibilities and duties of the Project Ecologist will include the following:

- Review and input to the final construction phase CEMP in respect of ecological matters:
- In liaison with Environmental Clerk of Works, oversee and provide advice on all relevant ecology mitigation measures set out in the EIAR and planning permission conditions;
- Regular inspection and monitoring of the development, through all phases of construction/operation and provide ecological advice as required;
- Carry out ecological monitoring and survey work as may be required by the planning authority.

#### 4.1.4 Project Hydrologist

The Project Hydrologist will report to the Environmental Clerk of Works and is responsible for inspection and review of drainage and water quality aspects associated with construction of the wind farm. The Project Hydrologist will not be full time on site but will visit the site at least once a month during construction and on a weekly basis during site preparation/groundworks.

The responsibilities and duties of the Project Hydrologist will include the following:

- Assist in compiling a final drainage design before construction commences and attend the site to set out and assist with micro siting of drainage controls. This will be completed over several site visits at the start of the construction phase;
- Review and input to the final construction phase CEMP in respect of drainage and water quality management;
- Following the initial stage of drainage construction regular site visits will be required, at least once a month, to complete hydrological and water quality audits and reviews and report any issues noted to the Site Supervisor/Construction Manager; and,
- Complete ongoing inspection and monitoring of the development, particularly in areas of drainage control, through all phases of construction (including pre, during and post construction) and ensure construction is carried out as specified in the EIAR, and in relevant planning conditions.

## 4.1.5 Project Geotechnical Engineer / Geologist

The Geotechnical Engineer or Project Geologist will report to the Environmental Clerk of Works and is responsible for inspection and review of geotechnical aspects associated with construction of the wind



farm. The Geotechnical Engineer will be full time on site during the site preparation/groundworks and will visit site at least once a month during the remainder of the construction phase.

The responsibilities and duties of the Geotechnical Engineer or Geologist will include the following:

- Supervision of all excavation works as part of the construction of the proposed development, to complete geotechnical audits and reviews and report any issues to the Site Supervisor/Construction Manager;
- > Ensuring that identified hazards are listed in the Construction Risk Register and that these are subject to ongoing monitoring; and,
- Ongoing inspection and monitoring of the development, particularly in areas of peatland and the peat repository areas, through all phases of construction (including pre, during and post construction) and ensure construction is carried out as specified in the EIAR, and in relevant planning conditions.

## **4.2** Water Quality and Monitoring

#### 4.2.1 **Pre-Construction Baseline Monitoring**

Water quality field testing and laboratory analysis will be undertaken prior to commencement of felling and construction at the site. The monitoring programme will be subject to agreement with Leitrim County Council and Sligo County Council but will be based on the planning stage programme already carried out.

Analysis will be for a range of parameters with relevant regulatory limits along with EQSs and sampling will be undertaken for each stream that drains from the construction site.

Baseline sampling will be completed on at least two occasions and these should coincide with low flow and high flow stream conditions. The high flow sampling event will be undertaken after a period of sustained rainfall, and the low flow event will be undertaken after a dry spell.

### 4.2.2 Construction Phase Monitoring

#### 4.2.2.1 **Daily Visual Inspections**

Daily visual inspections of drains and outfalls will be performed during the construction period to ensure suspended solids are not entering streams and rivers on site, to identify any obstructions to channels and to allow appropriate maintenance of the drainage regime. Should the suspended solids levels measured during construction be higher than the existing levels, the source will be identified and additional mitigation measures implemented.

Inspection sheets and photographic records will be kept on site. Inspection points will include the in-situ field monitoring point locations and the laboratory analysis sampling points. Inspection points will depend on works being completed within the catchment upstream of the identified monitoring locations. Visual inspections will also be completed after major rainfall events, i.e. after events of >25mm rainfall in any 24-hour period and data including photographs will be collected by visual inspections and independently assessed by the supervising hydrologist who will monitor and advise on the records being received.

The following periodic inspection regime will be implemented:

Daily general visual inspections of site operations and inspections of all watercourses within the site and in the surrounding area by the Environmental Clerk of Works or a



- suitably qualified and competent person as delegated by the Environmental Clerk of Works;
- Inspections to include all elements of drainage infrastructure to ensure the system is operating correctly and to identify any maintenance that is required. Any changes, such as discolouration, odour, oily sheen or litter should be noted and corrective action should be implemented. High risk locations such as settlement ponds will be inspected daily. Daily inspections checks will be completed on plant and equipment, and whether materials such as straw bales or oil absorbent materials need replacement;
- Event based inspections by the Environmental Clerk of Works as follows:
  - >10 mm/hr (i.e. high intensity localised rainfall event);
  - >25 mm in a 24-hour period (heavy frontal rainfall lasting most of the day);
     or,
  - Rainfall depth greater than monthly average in 7 days (prolonged heavy rainfall over a week).
- Monthly site inspections by the Project Hydrologist/ Environmental Clerk of Works during construction phase;
- Quarterly site inspections by the Project Hydrologist/Environmental Clerk of Works after construction for a period of one year following the construction phase; and,
- A written record will be maintained or available on-site within this Construction Environmental Management Plan (CEMP) which will be maintained on-site during the construction phase.

#### 4.2.2.2 Continuous Turbidity Monitoring

Turbidity monitors or sondes can be installed where required at locations surrounding the wind farm site. The sondes will provide continuous readings for turbidity levels in the watercourse. This equipment will be supplemented by daily visual monitoring at their locations as outlined in the sections below.

#### 4.2.2.3 **Monthly Laboratory Analysis**

Baseline laboratory analysis of a range of parameters with relevant regulatory limits and EQSs will be undertaken as per water monitoring programme for the overall windfarm development and each primary watercourse along the route. This will not be restricted to just these locations around the immediate wind farm site with further sampling points added as deemed necessary by the Environmental Clerk of Works in consultation with the Project Hydrologist and Site Manager.

#### 4.2.2.4 Field Monitoring

Field chemistry measurements of unstable parameters, (pH, conductivity, temperature) will be taken at the surface water monitoring locations, as per water monitoring programme for the overall wind farm development and each primary watercourse along the route along with at all installed sonde locations. These analyses will be carried out by either the Environmental Clerk of Works or the Project Hydrologist. In-situ field monitoring will be completed on a weekly basis. In-situ field monitoring will also be completed after major rainfall events, i.e. after events of >25mm rainfall in any 24-hour period. The supervising hydrologist will monitor and advise on the readings collected by in-situ field monitoring.

#### 4.2.2.5 **Monitoring Parameters**

The analytical determinants of the monitoring programme (including limits of detection and frequency of analysis) will be as per S.I. No. 272 of 2009 European Communities Environmental Objectives (Surface Waters) Regulations and European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009. The likely suite of determinants will include:



- > pH (field measured)
- > Electrical Conductivity (field measured)
- > Temperature (field measured)
- Dissolved Oxygen (field measured)
- > Total Phosphorus
- Chloride
- Nitrate
- Nitrite

  Total Nitrogen
- > Total Nitrogen
- Ortho-Phosphate
- Ammonia N
- > Biochemical Oxygen Demand
- Total Suspended Solids

## 4.2.3 Construction Phase Drainage Inspections & Maintenance

Drainage performance will form part of the civil works contract requirements. During the construction phase the effectiveness of drainage measures designed to minimise runoff entering works areas and capture and treatment of potentially silt-laden water from the works areas will be monitored periodically (daily, weekly, and event based monitoring, i.e. after heavy rainfall events) by the Environmental Clerk of Works and/or the Project Hydrologist. The Environmental Clerk of Works will respond to changing weather and drainage conditions on the ground as the project proceeds, to ensure the effectiveness of the drainage design is maintained.

Prior to the commencement of construction an inspection and maintenance plan for the on-site drainage system will be prepared by the Environmental Clerk of Works in consultation with the Project Hydrologist. Regular inspections of all installed drainage systems will be undertaken, especially after heavy rainfall, to check for blockages, and ensure there is no build-up of standing water in parts of the systems where it is not intended.

Regular inspections of all existing and installed drainage systems will be undertaken, especially after heavy rainfall, to check for blockages, and ensure there is no build-up of standing water within the system. Any excess build-up of silt levels at check dams, the settlement ponds, or any other drainage features that may decrease the effectiveness of the drainage feature, will be removed.

The following periodic inspection regime is proposed:

- Daily general visual inspections by Environmental Clerk of Works;
- Weekly (existing & new drains) inspections by the Environmental Clerk of Works and/or the site Construction Manager;
- Inspection to include all elements of drainage systems and all monitoring. Inspections required to ensure that drainage systems are operating correctly and to identify any maintenance that is required. Any changes, such as discolouration, odour, oily sheen or litter should be noted and corrective action should be implemented. High risk locations such as settlement ponds will be inspected daily. Daily inspections checks will be completed on plant and equipment, and whether materials such as silt fencing or oil absorbent materials need replacement;
- Event based inspections by the Environmental Clerk of Works as follows:
- > 10 mm/hr (i.e. high intensity localised rainfall event);
- >25 mm in a 24-hour period (heavy frontal rainfall lasting most of the day); or,
- Rainfall depth greater than monthly average in 7 days (prolonged heavy rainfall over a week).
- Monthly site inspections by the Project Hydrologist during construction phase; and,



- Quarterly site inspections by the Project Hydrologist after construction for a period of one year following the construction phase.
- A written record will be maintained or available on-site of all construction phase monitoring undertaken.

#### 4.2.4 Surface Water Monitoring Reporting

Visual inspection and laboratory analysis results of water quality monitoring shall assist in determining requirements for any necessary improvements in drainage controls and pollution prevention measures implemented on site.

It will be the responsibility of the Environmental Clerk of Works to present the ongoing results of water quality and weather monitoring at or in advance of regular site meetings.

Reports on water quality will consider all field monitoring and visual inspections, and results of laboratory analysis completed for that period. Reports will describe how the results compare with baseline data as well as previous reports on water quality. The reports will also describe whether any deterioration or improvement in water quality has been observed, whether any effects are attributable to construction activities and what remedial measures or corrective actions have been implemented. Any proposed alteration to sampling frequency will be agreed with Leitrim County Council and Sligo County Council in advance.

#### 4.2.5 **Post Construction Monitoring**

#### 4.2.5.1 Monthly Laboratory Analysis Sampling

Monthly sampling for laboratory analysis for a range of parameters adopted during pre-commencement and construction phases will continue for six months after construction is complete. The supervising hydrologist will monitor and advise on the readings being received from the testing laboratory.

## 4.3 Environmental Awareness and Training

#### 4.3.1 **Environmental Induction**

The Environmental Induction will be integrated into the general site induction on a case by case basis for each member of staff employed on-site depending on their assigned roles and responsibilities on site. Where necessary, the Environmental Induction will as a minimum include:

- A copy of the Environmental Management Site Plans and discussion of the key environmental risks and constraints;
- > An outline of the CEMP structure;
- A discussion of the applicable Works Method Statement;
- The roles and responsibilities of staff, including contractors, in relation to environmental management; and,
- An outline of the Environmental Incident Management Procedure.

#### 4.3.2 **Toolbox Talks**

Tool box talks will be held by the ECoW or Site Supervisor/Construction Manager at the commencement of each day, or at the commencement of new activities. The aims of the tool box talks are to identify the specific work activities that are scheduled for that day or phase of work. In addition, the necessary work method statements and sub plans will be identified and discussed prior to the commencement of the day's activities.



Site meetings will be held on a regular basis involving all site personnel. The objectives of site meetings are to discuss the coming week's activities and identify the relevant work method statements and sub plans that will be relevant to that week's activities. Additionally, any non-compliance identified during the previous week will also be discussed with the aim to reduce the potential of the same non-compliance reoccurring.

## 5. EMERGENCY RESPONSE PLAN

#### 5.1 **Overview**

The Emergency Response Plan (ERP) is presented in this section of the CEMP. It provides details of procedures to be adopted in the event of an emergency. The site ERP includes details on the response required and the responsibilities of all personnel in the event of an emergency. The ERP will require updating and submissions from the contractor/PSCS and suppliers as the project progresses. Where subcontractors that are contracted on site are governed by their own emergency response procedure a bridging arrangement will be adopted to allow for inclusion of the sub-contractor's ERP within this within this document.

This is a working document that requires updating throughout the various stages of the project.

#### 5.1.1 Roles and Responsibilities

The chain of command during an emergency response sets out who is responsible for coordinating the response. The Site Supervisor/Construction Manager will lead the emergency response which makes them responsible for activating and coordinating the emergency response procedure. The other site personnel who can be identified at this time who will be delegated responsibilities during the emergency response are presented in Figure 5-1. In a situation where the Site Supervisor/ Construction Manager is unavailable or incapable of coordinating the emergency response, the responsibility will be transferred to the next person in the chain of command outlined in Figure 5-1. This will be updated throughout the various stages of the project.



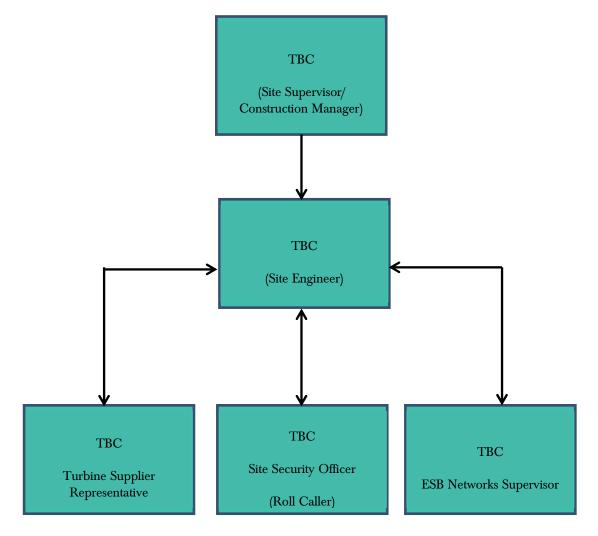


Figure 5-1 Emergency Response Procedure Chain of Command

## 5.1.2 Hazard Identification

In order to establish the type and scale of potential emergencies that may occur, the following hazards have been identified as being potential situations that may require an emergency response in the event of an occurrence.

Table 5-1 Hazards associated with potential emergency situations

Table 3-1 Hazards associated with potential emergency situati	0115
Hazard	Emergency Situation
Construction Vehicles: Dump trucks, tractors,	Collision or overturn which has resulted in
excavators, cranes etc.	operator or third-party injury.
	Excessive movement of peat on site; onset of peat
Peat Instability	slide.
	Entanglement, amputation or electrical shock
Abrasive wheels/Portable Tools	associated with portable tools
	Electrical shock or gas leak associated with an
Contact with services	accidental breach of underground services
Fire	Injury to operative through exposure to fire

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Hazard	Emergency Situation
Falls from heights including falls from scaffold	
towers, scissor lifts, ladders, roofs and turbines	Injury to operative after a fall from a height
	Illness unrelated to site activities of an operative
Sickness	e.g. heart attack, loss of consciousness, seizure
	This will be included upon agreement and
Turbine Specific Incident	selection of the final turbine type

In the event of an emergency situation associated with, but not restricted to, the hazards outlined in Table 5-1 the Site Supervisor/Construction Manager will carry out the following:

- Establish the scale of the emergency situation and identify the number of personnel, if any, that have been injured or are at risk of injury.
- Where necessary, sound the emergency siren/fog horn that activates an emergency evacuation on the site. The Site Supervisor/Construction Manager must proceed to the assembly point if the emergency poses any significant threat to their welfare and if there are no injured personnel at the scene that require assistance. The Site Supervisor/Construction Manager will be required to use their own discretion at that point. In the case of fire, the emergency evacuation of the site should proceed, without exception. The site evacuation procedure is outlined in Section 5.1.3.
- Make safe the area if possible and ensure that no identifiable risk exists with regard to dealing with the situation e.g. if a machine has turned over, ensure that it is in a safe position so as not to endanger others before assisting the injured.
- > Contact the required emergency services or delegate the task to someone. If delegating the task, ensure that the procedures for contacting the emergency services as set out in Section 5.3 is followed.
- > Take any further steps that are deemed necessary to make safe or contain the emergency incident e.g. cordon off an area where an incident associated with electrical issues has occurred.
- Contact any regulatory body or service provider as required e.g. ESB Networks the numbers for which as provided in Section 5.4.
- Contact the next of kin of any injured personnel where appropriate.

#### 5.1.3 Site Evacuation/Fire Drill

A site evacuation/fire drill procedure will provide basis for carrying out the immediate evacuation of all site personnel in the event of an emergency. The following steps will be taken:

- Notification of the emergency situation. Provision of a siren or fog horn to notify all personnel of an emergency situation.
- An assembly point will be designated in the construction compound area and will be marked with a sign. All site personnel will assemble at this point.
- A roll call will be carried out by the Site Security Officer to account for all personnel on site
- > The Site Security Officer will inform the Site Supervisor/Construction Manager when all personnel have been accounted for. The Site Supervisor/Construction Manager will decide the next course of action, which will be determined by the situation that exists at that time, and will advise all personnel accordingly.

All personnel will be made aware of the evacuation procedure during site induction. The Fire Services Acts of 1981 and 2003 require the holding of fire safety evacuation drills at specified intervals and the keeping of records of such drills.



## Environmental Emergency Response Procedure

#### 5.2.1 Excessive Peat Movement

Where there is excessive peat movement or continuing peat movement recorded at a monitoring location, or identified at any location within the site, but no apparent signs of distress to the peat (e.g. cracking, surface rippling) then the following shall be carried out.

- 12. All construction activities shall cease within the affected area.
- 13. Increased monitoring at the location shall be carried out. The area will be monitored, as appropriate, until such time as movements have ceased.
- 14. Re-commencement of limited construction activity shall only start following a cessation of movement and the completion of a geotechnical risk assessment by a geotechnical engineer.
- 15. Such detailed monitoring and awareness will further ensure that the potential for 5.2.2 below is absolutely minimised.

#### 5.2.2 Onset of Peat Slide

In the very unlikely event of an onset or actual detachment of peat (e.g. cracking, surface rippling) then the following shall be carried out.

- 1. On alert of a peat slide incident, all construction activities will cease and all available resources will be diverted to assist in the required mitigation procedures.
- 2. Where considered possible action will be taken to prevent a peat slide reaching any watercourse. This will take the form of the construction of check barrages on land. Due to the terrain, the possible short run-out length to watercourses, speed of movement and the inability to predict locations it may not be possible to implement any on-land prevention measures, in this case a watercourse check barrage will be implemented.
- 3. For localised peat slides that do not represent a risk to a watercourse and have essentially come to rest the area will be stabilised initially by rock infill, if required. The failed area and surrounding area will then be assessed by the geotechnical engineer and stabilisation procedures implemented. The area will be monitored, as appropriate, until such time as movements have ceased.

## 5.2.3 Spill Control Measures

Every effort will be made to prevent an environmental incident during the construction and operational phase of the project. However, in the event of an oil / fuel spill occurring the following steps will be followed:

- > Stop the source of the spill and raise the alarm to alert people working in the vicinity of any potential dangers.
- If applicable, eliminate any sources of ignition in the immediate vicinity of the incident.
- Contain the spill using the spill control materials, track mats or other material as required. Do not spread or flush away the spill.
- If possible, cover or bund off any vulnerable areas where appropriate such as drains, watercourses or sensitive habitats.
- If possible, clean up as much as possible using the spill control materials.



- Contain any used spill control material and dispose of used materials appropriately using a fully licensed waste contractor with the appropriate permits so that further contamination is limited.
- Notify the Environmental Clerk of Works immediately giving information on the location, type and extent of the spill so that they can take appropriate action.
- The Environmental Clerk of Works will inspect the site and ensure the necessary measures are in place to contain and clean up the spill and prevent further spillage from occurring.
- The Environmental Clerk of Works will notify the appropriate regulatory body such as Leitrim County Council and Sligo County Council, and the Environmental Protection Agency (EPA), if deemed necessary.

The importance of a swift and effective response in the event of such an incident occurring cannot be over emphasised. Environmental incidents are not limited to just fuel spillages. Therefore, any environmental incident must be investigated in accordance with the following steps.

- The Environmental Clerk of Works must be immediately notified.
- If necessary, the Environmental Clerk of Works will inform the appropriate regulatory authority. The appropriate regulatory authority will depend on the nature of the incident.
- The details of the incident will be recorded on an Environmental Incident Form which will provide information such as the cause, extent, actions and remedial measures used following the incident. The form will also include any recommendations made to avoid reoccurrence of the incident.
- If the incident has impacted on an ecologically sensitive receptor, such as a sensitive habitat, protected species or designated conservation site (pSPA or cSAC), the Environmental Clerk of Works will liaise with the Project Ecologist.
- If the incident has impacted on a sensitive receptor such as an archaeological feature the Environmental Clerk of Works will liaise with the Project Archaeologist.
- A record of all environmental incidents will be kept on file by the Environmental Clerk of Works and the Main Contractor. These records will be made available to the relevant authorities such as Leitrim County Council and Sligo County Council, EPA if required.

The Environmental Clerk of Works will be responsible for any corrective actions required as a result of the incident e.g. an investigative report, formulation of alternative construction methods or environmental sampling, and will advise the Main Contractor as appropriate.

## 5.3 Contact the Emergency Services

#### **Emergency Communications Procedure**

In the event of requiring the assistance of the emergency services the following steps should be taken:

**Stay calm**. It's important to take a deep breath and not get excited. Any situation that requires 999/112 is, by definition, an emergency. The dispatcher or call-taker knows that and will try to move things along quickly, but under control.

Know the <u>location</u> of the emergency and the number you are calling from. This may be asked and answered a couple of times but don't get frustrated. Even though many emergency call centres have enhanced capabilities meaning they are able to see your location on the computer screen they are still required to confirm the information. If for some reason you are disconnected, at least emergency crews will know where to go and how to call you back.



Wait for the call-taker to ask questions, then answer clearly and calmly. If you are in danger of assault, the dispatcher or call-taker will still need you to answer quietly, mostly "yes" and "no" questions.

If you reach a recording, listen to what it says. If the recording says your call cannot be completed, hang up and try again. If the recording says all call takers are busy, WAIT. When the next call-taker or dispatcher is available to take the call, it will transfer you.

Let the call-taker guide the conversation. He or she is typing the information into a computer and may seem to be taking forever. There's a good chance, however, that emergency services are already being sent while you are still on the line.

**Follow all directions**. In some cases, the call-taker will give you directions. Listen carefully, follow each step exactly, and ask for clarification if you don't understand.

**Keep your eyes open**. You may be asked to describe victims, suspects, vehicles, or other parts of the scene.

Do not hang up the call until directed to do so by the call taker.

Due to the remoteness of the site it may be necessary to liaise with the emergency services on the ground in terms of locating the site. This may involve providing an escort from a designated meeting point that may be located more easily by the emergency services. This should form part of the site induction to make new personnel and sub-contractors aware of any such arrangement or requirement if applicable.

#### 5.4 Contact Details

A list of emergency contacts is presented in Table 5-2. A copy of these contacts will be included in the Site Safety Manual and in the site offices and the various site welfare facilities.

Table 5.5-2 Emergency Contacts

1 able 5.5-2 Emergency Contacts	
Contact	Telephone no.
Emergency Services – Ambulance, Fire, Gardaí	999/112
Doctor – Drumshambo Health Centre	071 964 1105
Hospital – Sligo University Hospital	071 917 1111
ESB Emergency Services	1850 372 999
Gas Networks Ireland Emergency	1850 20 50 50
Gardaí –Drumshambo Garda Station	071 9641002
Health and Safety Co-ordinator - Health & Safety Services	ТВС
Health and Safety Authority	1890 289 389
Inland Fisheries Ireland (IFI)	1890 347 424
Project Supervisor Construction Stage (PSCS): TBC	ТВС



Contact	Telephone no.
Project Supervisor Design Stage (PSDS): MKO	091 735611
Client: Coillte	01 2011111

## 5.4.1 **Procedure for Personnel Tracking**

All operatives on site without any exception will have to undergo a site induction where they will be required to provide personal contact details which will include contact information for the next of kin.

In the event of a site operative becoming in an emergency situation where serious injury has occurred and hospitalisation has taken place, it will be the responsibility of the Site Manager or next in command if unavailable to contact the next of kin to inform them of the situation that exists.

### 5.5 Induction Checklist

Table 5-3 provides a list of items highlighted in this ERP which must be included or obtained during the mandatory site induction of all personnel that will work on the site. This will be updated throughout the various stages of the project.

Table 5-5-3 Emergency Response Plan Items Applicable to the Site Induction Process

ERP Items to be included in Site Induction	Status
All personnel will be made aware of the evacuation procedure during site induction	
Due to the remoteness of the site it may be necessary to liaise with and assist the emergency services on the ground in terms of locating the site. This may involve providing an escort from a designated meeting point that may be located more easily by the emergency services. This should form part of the site induction to make new personnel and subcontractors aware of any such arrangement or requirement if applicable.	
All operatives on site without any exception will have undergo a site induction where they will be required to provide personal contact details which will include contact information for the next of kin.	



### 6. MITIGATION PROPOSALS

All mitigation measures relating to the pre-commencement, construction and operational phases of the proposed development were set out in the various sections of the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) prepared as part of the planning permission application to Leitrim County Council and Sligo County Council.

This section of the CEMP groups together all of the mitigation measures presented in the EIAR and NIS respectively. The Mitigation Measures are presented in the following pages.

By presenting the mitigation proposals in the below format, it is intended to provide an easy to audit list that can be reviewed and reported on during the future phases of the project. The tabular format in which the below information is presented, can be further expanded upon during the course of future project phases to provide a reporting template for site compliance audits.



D 4 37	D 4 - TT 1:			
Ref. No.	Reference Heading	Location	Mitigation Measure	
	Pre-Commencement Phase			
MM1	Environmental Management	EIAR Chapter 4	The Contractor will be responsible for implementing the mitigation measures specified throughout the EIAR and compiled in the Audit Report which is included in the CEMP. The Contractor will also be responsible for ensuring that all construction staff understand the importance of implementing the mitigation measures. The implementation of the mitigation measures will be overseen by the environmental clerk of works or supervising hydrogeologists, environmental scientists, ecologists or geotechnical engineers, depending on who is best placed to advise on the implementation. The system of auditing referred to above ensures that the mitigation measures are maintained for the duration of the construction phase, and into the operational phase where necessary.	
MM2	Environmental Management	EIAR Chapter 4 CEMP Section 4	The Environmental Clerk of Works will maintain responsibility for monitoring the works and Contractors/Sub-contractors from an environmental perspective. In addition, an Environmental Clerk of Works or Project Ecologist, Project Hydrologist, Project Geotechnical engineer will visit the site regularly and report to the Site Environmental Office.	
MM3	Environmental Management	EIAR Chapter 4 CEMP Section 4	A Site Environmental Clerk of Works will oversee the site works and implementation of the Construction Environmental Management Plan (CEMP), and provide on-site advice on the mitigation measures necessary as necessary to ensure the project proceeds as intended. The level, detail and frequency of reporting expected from the Site Environmental Clerk of Works for the Construction Manager, developer's project manager, and any Authorities or other Agencies, will be agreed by parties where required prior to commencement of construction, and may be further adjusted as required during the course of the project.	
MM4	Environmental Management	EIAR Chapter 6 CEMP Section 4	An Ecological Clerk of Works (ECoW) or Project Ecologist will be appointed. Duties will include:  Undertake a pre-construction transect/walkover bird survey to ensure that significant effects on breeding birds will be avoided.  Inform and educate on-site personnel of the ornithological and ecological sensitivities within the proposed development site.  Oversee management of ornithological and ecological issues during the construction period and advise on ornithological issues as they arise	



MM5 MM6	Site Drainage Plan  Preparative Site Drainage	CEMP Section 3  CEMP Section 3	<ul> <li>Provide guidance to contractors to ensure legal compliance with respect to protected species onsite.</li> <li>Liaise with officers of consenting authorities and other relevant bodies where required with regular updates in relation to construction progress.</li> <li>The Project Hydrologist/Design Engineer will assist in preparing a site drainage plan before construction commences.</li> <li>All materials and equipment necessary to implement the drainage mitigation measures will be brought on-site in advance of any works commencing. The drainage measures outlined in the</li> </ul>
	Management,		EIS/EIAR will be installed prior to, or at the same time as the works they are intended to drain. An adequate amount of clean stone, silt fencing, stakes, etc. will be kept on site at all times to implement the drainage design measures as necessary.
MM7	Pre-emptive site drainage management	CEMP Section 3	The works programme for the groundworks part of the construction phase of the project will also take account of weather forecasts and predicted rainfall in particular.
MM8	Drainage Inspection	CEMP Section 3	Prior to commencement of works in sub-catchments across the site main drain inspections will be competed to ensure ditches and streams are free from debris and blockages that may impede drainage.
MM9	Drainage Maintenance	CEMP Section 3	An inspection and maintenance plan for the drainage system on site will be prepared in advance of commencement of any works. Regular inspections of all installed drainage systems will be necessary, especially after heavy rainfall, to check for blockages, and ensure there is no build-up of standing water at parts of the systems where it is not intended. The inspection of the drainage system will be the responsibility of the site Environmental Clerk of Works or the supervising hydrologist.
MM10	Earthworks	EIAR Chapter 8	Drainage and associated pollution control measures will be implemented onsite before the main construction works commence. Where possible drainage controls will be installed during seasonally dry ground conditions. This will reduce the possibility of impact on surface waters by suspended sediment released during construction and entrained in surface run-off.
MM11	Earthworks	EIAR Chapter 8	A 50-metre buffer zone will be maintained around watercourses during the windfarm construction. With the exception of road crossings of streams and associated culvert construction, no development infrastructure, vehicle or plant movement, construction activity or stock-piling of construction materials or construction waste will take place within this zone, and no vegetation will be removed from within this zone.
MM12	Traffic Management Plan, Delivery Programme,	EIAR Chapter 14 Appendix 14-2	A Pre-Construction Condition Survey – Where required by the local authority, a pre-condition survey of roads associated with the proposed development can be carried out immediately prior



pre-commencement road works	to construction commencement to record an accurate condition of the road at the time. Where required the timing of these surveys will be agreed with the local authority.  A Traffic Management Plan (TMP), specifying details relating to traffic management will be included in the CEMP prior to the commencement of the construction phase of the proposed development. The TMP will be agreed with the local authority and An Garda Síochána prior to construction works commencing on site. The detailed TMP will include the following:
	<ul> <li>Traffic Management Coordinator – a competent Traffic Management Co-ordinator will be appointed for the duration of the project and this person will be the main point of contact for all matters relating to traffic management.</li> <li>Delivery Programme – a programme of deliveries will be submitted to the County Councils in advance of deliveries of turbine components to site. Liaison with the relevant local authorities and Transport Infrastructure Ireland (ITI) will be carried out where required regarding requirements such as delivery timetabling. The programme will ensure that deliveries are scheduled in order to minimise the demand on the local network and minimise the pressure on the access to the site.</li> <li>Information to locals – Locals in the area will be informed of any upcoming traffic related matters e.g. temporary lane/road closures (where required) or delivery of turbine components at night, via letter drops and posters in public places.  Information will include the contact details of the Project Co-ordinator, who will be the main point of contact for all queries from the public or local authorities during normal working hours. An "out of hours" emergency number will also be provided.</li> <li>A Pre and Post Construction Condition Survey – Where required by the local authority, a pre-condition survey of roads associated with the proposed development can be carried out immediately prior to construction commencement to verify and record the condition of the road at the time. A post construction survey will be carried out after works are completed to ensure that any remediation works are carried out to a satisfactory standard. Where required the timing of these surveys will be agreed with the local authority. All road surfaces and boundaries will be re-instated to pre-development condition, as agreed with the local authority engineers.</li> </ul>



			<ul> <li>Liaison with the relevant local authority - Liaison with the County Councils and An Garda Siochána, will be carried out during the delivery phase of the large turbine vehicles, when an escort for all convoys will be required. Once the surveys have been carried out and "prior to commencement" status of the relevant roads established, (in compliance with the provisions of the CEMP), the Roads section will be informed of the relevant names and contact numbers for the Project Developer/Contractor Site Manager as well as the Site Environmental Manager.</li> <li>Implementation of temporary alterations to road network at critical junctions – at locations highlighted in section 14.1.8. In addition, in order to minimise the impact on the existing environment during turbine component deliveries the option of blade adaptor trailers will also be used where deemed practicable.</li> <li>Identification of delivery routes – These routes will be agreed with the County Councils and adhered to by all contractors.</li> <li>Delivery times of large turbine components - The management plan will include the option to deliver the large wind turbine plant components at night in order to minimise disruption to general traffic during the construction stage.</li> <li>Travel plan for construction workers – While the assessment above has assumed the worst case in that construction workers will drive to the site, the construction company will be required to provide a travel plan for construction staff,</li> <li>Additional measures - Various additional measures will be put in place in order to minimise the effects of the development traffic on the surrounding road network including wheel washing facilities on site and sweeping / cleaning of local roads as required. These are set out in the CEMP which is contained in Appendix 4.3. Re-instatement works - All road surfaces and boundaries will be re-instated to predevelopment condition, as agreed with the local authority engineers.</li> </ul>
MM13	Information to Local Residents	EIAR Chapter 14	Locals in the area will be informed of any upcoming traffic related matters e.g. temporary lane/road closures (where required) or delivery of turbine components at night, via letter drops and posters in public places. Information will include the contact details of the Project Co-Ordinator or the Community Liaison Officer, who will be the main points of contact for all queries from the public or local authority during normal working hours. An "out of hours" emergency number will also be provided
MM14	Felling	EIAR Chapter 7	Forestry felling will be conducted outside the general bird breeding season which runs from the 1 <sup>st</sup> of March to the 31 <sup>st</sup> of August.



			Construction Phase
Construction 1	Management		
MM15	Health and Safety	EIAR Chapter 5	<ul> <li>During construction of the Proposed Development, all staff will be made aware of and adhere to:</li> <li>Safety, Health and Welfare at Work Act 2005 (No. 10 of 2005);</li> <li>Safety, Health and Welfare at Work (General Application) Regulations 2007 (S.I. No. 299 of 2007), as amended;</li> <li>Safety, Health and Welfare at Work (Construction) Regulations 2013 (S.I. 291 of 2013), as amended; and</li> <li>Safety, Health and Welfare at Work (Work at Height) Regulations 2006 (S.I. No. 318 of 2006).</li> </ul>
			This will encompass the use of all necessary Personal Protective Equipment and adherence to the site Health and Safety Plan which will include measures to exclude members of the public from certain areas of the site during construction.
MM16	Health and Safety	EIAR Chapter 4	Stock-proof fencing will be erected around the borrow pit and peat and spoil repositories if deemed necessary to prevent uncontrolled access to this area. Appropriate health and safety signage will also be erected on this fencing and at locations around the site
MM17	Health and Safety	EIAR Chapter 5	The scale and scope of the project requires that a Project Supervisor Design Process (PSDP) and Project Supervisor Construction Stage (PSCS) are required to be appointed in accordance with the provisions of the Health & Safety Authority's 'Guidelines on the Procurement, Design and Management Requirements of the Safety, Health and Welfare at Work (Construction) Regulations 2006'.  The PSDP appointed for the construction stage shall be required to perform his/her duties as
			prescribed in the Safety, Health and Welfare at Work (Construction) Regulations. These duties include (but are not limited to):



			<ul> <li>Identify hazards arising from the design or from the technical, organisational, planning or time related aspects of the project;</li> <li>Where possible, eliminate the hazards or reduce the risks;</li> <li>Communicate necessary control measures, design assumptions or remaining risks to the PSCS so they can be dealt with in the Safety and Health Plan;</li> <li>Ensure that the work of designers is coordinated to ensure safety;</li> <li>Organise co-operation between designers;</li> <li>Prepare a written Safety and Health Plan;</li> <li>Prepare a safety file for the completed structure and give it to the client; and</li> <li>Notify the Authority and the client of non-compliance with any written directions issued.</li> </ul>
MM18	Health and Safety	EIAR Chapter 5	The PSCS appointed for the construction stage shall be required to perform his/her duties as prescribed in the Safety, Health and Welfare at Work (Construction) Regulations. These duties include (but are not limited to):  Development of the Safety and Health Plan for the construction stage with updating where required as work progresses; Compile and develop safety file information Reporting of accidents / incidents; Weekly site meeting with PSCS; Coordinate arrangements for checking the implementation of safe working procedures. Ensure that the following are being carried out: Induction of all site staff including any new staff enlisted for the project from time to time; Toolbox talks as necessary; Maintenance of a file which lists personnel on site, their name, nationality, current Safe Pass number, current Construction Skills Certification Scheme (CSCS) card (where relevant) and induction date; Report on site activities to include but not limited to information on accidents and incidents, disciplinary action taken and PPE compliance;



			Monitor the compliance of contractors and others and take corrective action where necessary; and
			Notify the Authority and the client of non-compliance with any written directions issued.
MM19	Refuelling,	EIAR Chapter 4, 6, 8, 9 CEMP Section 3	On-site refuelling will be carried out using a mobile double skinned, bunded fuel bowser. The fuel bowser, a double-axel custom-built refuelling trailer will be re-filled off site and will be towed around the site by a 4x4 jeep to where machinery is located. It is not practical for all vehicles to travel back to a single refuelling point, given the size of the cranes, excavators, etc. that will be used during the construction of the proposed wind farm development. The 4x4 jeep will also carry fuel absorbent material and pads in the event of any accidental spillages. The fuel bowser will be parked on a level area in the construction when not in use. Refuelling operations will be carried out only by designated trained and competent operatives holding a permit to refuel. Mobile anti-pollution measures such as drip trays and fuel absorbent mats will be used during all refuelling operations
MM20	Environmental Management-Invasive Species	EIAR Chapter 6 CEMP Section 3	<ul> <li>Best practice measures in relation to invasive species are described below:</li> <li>All earthworks machinery will be thoroughly pressure-washed prior to arrival on site and prior to their further use elsewhere.</li> <li>Care will be taken not to disturb or cause the movement of invasive species fragments, either intentionally or accidentally.</li> <li>Stands of Knotweed will be clearly demarcated by temporary fencing and tracking within them will be strictly avoided. A minimum buffer of seven metres will be applied to avoid disturbance of lateral Knotweed rhizomes.</li> <li>Where works occur within 7m of a Knotweed stand these will be carried out under the supervision of a suitably qualified ecologist.</li> <li>Should removal of Knotweed off site be required this will be done so under the supervision of an ecologist in line with NPWS licencing.</li> <li>The machinery must be thoroughly cleaned down under supervision of an ecologist prior to moving away from the Knotweed contaminated area.</li> <li>All contractors and staff will be briefed about the presence, identification and significance of Knotweed before commencement of works.</li> <li>Good construction site hygiene will be employed to prevent the spread of these species with vehicles thoroughly cleaned down prior to leaving any site with the</li> </ul>



			potential to have supported invasive species. All plant and equipment employed on the construction site (e.g. excavator, footwear, etc.) will be thoroughly cleaned down on site to prevent the spread of invasive plant species such as Knotweed. All clean down must be undertaken in areas with no potential to result in the spread of invasive species.  When working at locations in proximity to natural watercourses, a suitable barrier will be erected between the watercourse and the stand of invasive species. This will assist in preventing the spread of any invasive species into the watercourse during their removal.  Any material that is imported onto any site will be verified by a suitably qualified ecologist to be free from any invasive species listed on the 'Third Schedule' of Regulations 49 & 50 of Regulations 49 and 50 of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011). This will be carried out by searching for rhizomes and plant material.  Any soils or subsoils contaminated with invasive species will sent for disposal to an authorized waste facility under licence from NPWS.  The treatment and control of invasive alien species will follow guidelines issued by the National Roads Authority - The Management of Noxious Weeds and Non-native Invasive Plant Species on National Roads (NRA 2010) and Irish Water (2016) Information and Guidance Document on Iapanese Knotweed.
MM21	Plant and Equipment Inspections	EIAR Chapter 8. CEMP Section 3	A programme for the regular inspection of plant and equipment for leaks and fitness for purpose will be developed at the outset of the construction phase.
MM22	Temporary water supply and onsite sanitation	EIAR Chapter 9	Water supply for the site office and other sanitation will be brought to site and removed after use from the site to be discharged at a suitable off-site treatment location
MM23	Pre-emptive site drainage management	EIAR Chapter 4, 8 CEMP Section 3	The works programme for the groundworks part of the construction phase of the project will also take account of weather forecasts and predicted rainfall in particular.



MM24	Protection of Watercourses	EIAR Chapter 8	During the near stream construction work and tree felling, double row silt fences may be emplaced immediately down-gradient of the working areas for the duration of the construction phase.
MM25	Concrete Deliveries and Management	EIAR Chapter 4	No washing out of any plant used in concrete transport or concreting operations will be carried out onsite. When concrete is delivered to site, only the chute of the delivery truck will be cleaned, using the smallest volume of water necessary, before leaving the site. Concrete trucks will be directed back to their batching plant for washout.
MM26	Concrete Deliveries and Management	EIAR Chapter 4 EIAR Chapter 8	No concrete will be transported around the site in open trailers or dumpers so as to avoid spillage while in transport.
MM27	Concrete Deliveries and Management	EIAR Chapter 4	Clearly visible signs in prominent locations will be placed close to concrete pour areas specifically stating washout of concrete lorries is not permitted on the site
MM28	Concrete Deliveries and Management	EIAR Chapter 4	Main pours will be planned days or weeks in advance. Large pours will be avoided when prolonged periods of heavy rain are forecast.
MM29	Concrete Deliveries and Management	EIAR Chapter 4	Concrete pumps and machine buckets will be restricted from slewing over watercourses while placing concrete.
MM30	Concrete Deliveries and Management	EIAR Chapter 4	Excavations will be sufficiently dewatered before concreting begins. Dewatering will continue while concrete sets.
MM31	Concrete Deliveries and Management	EIAR Chapter 4	Covers will be available for freshly placed concrete to avoid the surface washing away in heavy rain.
MM32	Concrete Deliveries and Management	EIAR Chapter 4  CEMP Section 3	Surplus concrete after completion of a pour will be returned to the concrete suppliers batching plant for recycling.
MM33	Road Cleanliness	EIAR Chapter 4 CEMP Section 3	A road sweeper will be available if any section of the public roads were to be dirtied by trucks associated with the proposed development.



MM34	Road Cleanliness	EIAR Chapter 3	Where it is deemed necessary, wheel washes will be provided near all site entrances to the public road
<b>D</b> . D	117	CEMP Section 4	
	esign and Management	T	
MM35	Earthworks	EIAR Chapter 9	Avoid working during heavy rainfall and for up to 24 hours after heavy events to ensure drainage systems are not overloaded.
MM36	Excavation Dewatering and Surface Water Quality	EIAR Chapter 9	<ul> <li>If required, pumping of excavation inflows will prevent build-up of groundwater in the excavation;</li> <li>The interceptor drainage will be discharged to the existing drainage system or over land;</li> <li>The pumped water volumes will be discharged via volume and sediment attenuation ponds adjacent to excavation areas, or via specialist treatment systems such as a "Siltbuster" unit;</li> <li>There will be no direct discharge to the existing drainage network and therefore no risk of hydraulic loading or contamination will occur; and,</li> <li>Daily monitoring of excavations by a suitably qualified person will occur during the construction phase. If high levels of seepage inflow occur, excavation work should immediately be stopped, and a geotechnical assessment undertaken.</li> </ul>
MM37	Watercourse Buffers	EIAR Chapter 9	A self-imposed buffer zone of 50m has been put in place for on-site streams and lakes.
MM38	Drainage Swales	EIAR Chapter 9, Appendix 4-5	Swales will be used to intercept and collect run off from construction areas of the site during the construction phase, and channel it to settlement ponds for sediment attenuation as per the drainage design.
MM39	Interceptor Drains	EIAR Chapter 9, Appendix 4-5	Interceptor drains will be installed up-gradient of any works areas to collect surface flow runoff and prevent it reaching excavations and construction areas of the site. It will then be directed to areas where it can be re-distributed over the ground as sheet flow as per the drainage design.
MM40	Transverse drains	EIAR Chapter 9, Appendix 4-5	On steep sections of access road transverse drains ('grips') will be constructed where appropriate in the surface layer of the road to divert any runoff off the road into swales/road side drains;
MM41	Check dams	EIAR Chapter 9, Appendix 4-5	Check dams will not be used in any natural watercourses, only artificial drainage channels and interceptor drains. The check dams will be installed at regular intervals along interceptor drains to restrict flow velocity, minimise channel erosion and promote sedimentation behind the dam as per the drainage design.



MM42	Level Spreaders	EIAR Chapter 9, Appendix 4-5	A level spreader will be constructed at the end of each interceptor drain to convert concentrated flows in the drain into diffuse sheet flow on areas of vegetated ground. The levels spreaders will be located downgradient of any proposed works areas in locations where they are not likely to contribute further to water ingress to construction areas of the site.
MM43	Vegetation filters	EIAR Chapter 9, Appendix 4-5	Vegetation filters, that is areas of existing vegetation, accepting drainage water issuing from level spreaders as sheet flow, will remove any suspended sediment from water channelled via interceptor drains or any remaining sediment in waters channelled via swales and settlement ponds.
MM44	Settlement ponds	EIAR Chapter 9, Appendix 4-5	Settlement ponds, placed either singly or a pair in series, will buffer volumes of run-off discharging from the drainage system during periods of high rainfall, by retaining water until the storm hydrograph has receded, thus reducing the hydraulic loading to water courses as per the drainage design.
MM44	Siltbuster	EIAR Chapter 9, Appendix 4-5	If the discharge water from construction areas fails to be of a high quality, then a filtration treatment system (such as a 'siltbuster' or similar equivalent treatment train (sequence of water treatment processes)) will be used to filter and treat all surface discharge water collected in the dirty water drainage system. This will apply for all of the construction phase.
MM45	Silt Fences	EIAR Chapter 9, Appendix 4-5	Silt fences will be emplaced within drains down-gradient of all construction areas. Silt fences are effective at removing heavy settleable solids. This will act to prevent entry to the existing drainage network of sand and gravel-sized sediment, released from excavation of mineral sub-soils of glacial and glacio-fluvial origin and entrained in surface water runoff. Inspection and maintenance of these structures during construction phase is critical to their functioning to stated purpose. They will remain in place throughout the entire construction phase.
MM46	Silt Bags	EIAR Chapter 9, Appendix 4-5	Silt bags will be used where small to medium volumes of water need to be pumped from excavations. As water is pumped through the bag, the majority of any sediment is retained by the geotextile fabric allowing filtered water to pass through.
MM47	Culvert Upgrades	EIAR Chapter 4, 9	The following mitigation is proposed for completion of windfarm culvert upgrades:  All proposed new natural stream crossings will be bottomless culverts and the existing banks will remain undisturbed as much as possible;  Where the proposed grid connection cabling route follows an existing forestry road or road proposed for upgrade, the cable will pass over or below the culvert within the access road;  Any guidance / mitigation measures proposed by the OPW or the Inland Fisheries Ireland will be incorporated into the design of the proposed crossings;



			<ul> <li>As a further precaution near stream construction work will only be carried out during the period permitted by Inland Fisheries Ireland for in-stream works according to the Eastern Regional Fisheries Board (2004) guidance document "Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites", that is, May to September inclusive. This time period coincides with the period of lowest expected rainfall, and therefore minimum runoff rates. This will minimise the risk of entrainment of suspended sediment in surface water runoff, and transport via this pathway to surface watercourses;</li> <li>During the near stream construction work double row silt fences will be emplaced immediately down-gradient of the construction area for the duration of the construction phase. There will be no batching or storage of cement allowed on-site</li> </ul>
MM48	Potential Release of Hydrocarbons	EIAR Chapter 9 CEMP Section 3	<ul> <li>Minimal refuelling or maintenance of construction vehicles or plant will take place on site. Off-site refuelling will occur at a controlled fuelling station where possible;</li> <li>On site re-fuelling of machinery will be carried out using a mobile double skinned fuel bowser. The fuel bowser, a double-axel custom-built refuelling trailer will be re-filled off site, and will be towed around the site by a 4x4 jeep to where machinery is located. The 4x4 jeep will also carry fuel absorbent material and pads in the event of any accidental spillages. The fuel bowser will be parked on a level area in the construction compound when not in use and only designated trained and competent operatives with permits to refuel, will be authorised to refuel plant on site. Mobile measures such as drip trays and fuel absorbent mats will be used during all refuelling operations;</li> <li>Onsite refuelling will be carried out by trained personnel only;</li> <li>Fuels stored on site will be minimised. Fuel storage areas if required will be bunded appropriately for the fuel storage volume for the time period of the construction and fitted with a storm drainage system and an appropriate oil interceptor</li> </ul>
MM49	Plant and equipment inspections	EIAR Chapter 9	Site plant will be regularly inspected for leaks and fitness for purpose; and, an emergency plan for the construction phase to deal with accidental spillages will be contained within Environmental Management Plan. Spill kits will be available to deal with accidental spillages.



MM50	Wastewater Disposal	EIAR Chapter 8	Temporary port-a-loo toilets located within a staff portacabin will be used during the construction phase. Wastewater from staff toilets will be directed to a sealed storage tank, with all wastewater being tankered off site by an appropriately consented waste collector to wastewater treatment plants.
Felling			
51	Felling Licence	EIAR Chapter 4	Felling will be carried out under the terms of a licence application to the Forest Service, as per the Forest Service's policy on granting felling licenses for wind farm developments
52	Clear felling of Coniferous Plantation	EIAR Chapter 4. CEMP Section 3	<ul> <li>Works will be overseen by an ECoW as described above.</li> <li>Machine combinations (i.e. hand-held or mechanical) will be chosen which are most suitable for ground conditions at the time of felling, and which will minimise soils disturbance;</li> <li>Trees will be cut manually inside the 50m buffer and using machinery to extract whole trees only;</li> <li>Checking and maintenance of roads and culverts will be on-going through any felling operation. No tracking of vehicle through watercourses will occur, as vehicles will use road infrastructure and existing watercourse crossing points. Where possible, existing drains will not be disturbed during felling works;</li> <li>Ditches which drain from the proposed area to be felled towards existing surface watercourses will be blocked, and temporary silt traps will be constructed. No direct discharge of such ditches to watercourses will occur. Drains and sediment traps will be installed during ground preparation. Collector drains will be excavated at an acute angle to the contour (~0.3%-3% gradient), to minimise flow velocities. Main drains to take the discharge from collector drains will include water drops and rock armour, as required, where there are steep gradients, and should avoid being placed at right angles to the contour;</li> <li>Sediment traps will be sited in drains downstream of felling areas. Machine access will be maintained to enable the accumulated sediment to be excavated. Sediment will be carefully disposed of in the peat disposal areas. Where possible, all new silt traps will be constructed on even ground and not on sloping ground;</li> <li>In areas particularly sensitive to erosion or where felling inside the 50 metre buffer is required, it will be necessary to install double or triple sediment traps.</li> <li>Double silt fencing will also be put down slope of felling areas which are located inside the 50 metre buffer zone;</li> </ul>



<ul> <li>All drainage channels will taper out before entering the aquatic buffer zone. This ensures that discharged water gently fans out over the buffer zone before entering the aquatic zone, with sediment filtered out from the flow by ground vegetation within the zone. On erodible soils, silt traps will be installed at the end of the drainage channels, to the outside of the buffer zone;</li> <li>Drains and silt traps will be maintained throughout all felling works, ensuring that they are clear of sediment build-up and are not severely eroded. Correct drain alignment, spacing and depth will ensure that erosion and sediment build-up are minimized and controlled;</li> </ul>
Brash mats will be used to support vehicles on soft ground, reducing peat and mineral soils erosion and avoiding the formation of rutted areas, in which surface water ponding can occur. Brash mat renewal should take place when they become heavily used and worn. Provision should be made for brash mats along all off-road routes, to protect the soil from compaction and rutting. Where there is risk of severe erosion occurring, extraction should be suspended during periods of high rainfall;
Timber will be stacked in dry areas, and outside a local 50 metre watercourse buffer. Straw bales and check dams to be emplaced on the down gradient side of timber storage/processing sites;
Works will be carried out during periods of no, or low rainfall, in order to minimise entrainment of exposed sediment in surface water run-off;
> Checking and maintenance of roads and culverts will be on-going through the
felling operation;  No crossing of streams by machinery will be permitted and only travel perpendicular to and away from stream will be allowed;
Refuelling or maintenance of machinery will not occur within 100m of a watercourse. Mobile bowser, drip kits, qualified personnel will be used where refuelling is required;
A permit to refuel system will be adopted at the site; and,
Branches, logs or debris will not be allowed to build up in aquatic zones. All such material will be removed when harvesting operations have been completed, but care will be taken to avoid removing natural debris deflectors.
care will be taken to avoid removing natural debris deflectors.



Peat, Subsoil	Peat, Subsoils and Bedrock							
MM53	Topsoil/Peat and Subsoil Excavation	EIAR Chapter 8	> >	Use of the existing road network to reduce peat excavation and borrow pit volumes; Use of floating roads (where acceptable to do so) to reduce peat excavation volumes; The peat and subsoil which will be removed during the construction phase will be localised to the Proposed Development infrastructure; A minimal volume of peat and subsoil will be removed to allow for infrastructural work to take place in comparison to the total volume present on the site due to optimisation of the layout by mitigation by design;				
MM54	Peat instability and failure	EIAR Chapter 8	> > > > > > > > > > > > > > > > > > > >	A Geotechnical Risk Register will be maintained throughout the construction phase by the Project Engineer which will provide the means to carry out a geotechnical risk assessment and recommend remedial action.  Appointment of experienced and competent contractors; The site will be supervised by experienced and qualified personnel; Allocate sufficient time for the project (be aware that decreasing the construction time has the potential to increase the risk of initiating a peat movement); Prevent undercutting of slopes and unsupported excavations; Maintain a managed robust drainage system; Prevent placement of loads/overburden on marginal ground as detailed in the peat stability assessment report; Set up, maintain and report findings from monitoring systems; Ensure construction method statements are followed or where agreed modified/ developed; and,Revise and amend the Geotechnical Risk Register as construction progresses.				
MM55	Erosion of Exposed Subsoils and Peat During Construction of Infrastructure	Appendix 4-2	>	Peat removed from turbine locations and access roads will be used for landscaping, placed alongside designated access roads, used to reinstate the 1 no. proposed borrow pits or placed in 2 no. repositories. Where possible, the acrotelm shall be stored with the vegetation part of the sod facing the right way up to encourage growth of plants and vegetation at the surface of the stored peat within the borrow pits. Re-seeding and spreading/planting of heather and moss cuttings will also be carried out in these areas. These measures will prevent erosion of stored peat in the long term. A full Peat and Spoil Management Plan for the development is included as Appendix 4-2.  Any excess temporary mounded peat in storage for long periods will be sealed using the back of an excavator bucket. This will prevent erosion of soil. Silt fences will be installed around				



			stockpiles to limit movement of entrained sediment in surface water runoff. The use of bunds around earthworks and mounds will prevent egress of water from the works.  In order to minimize erosion of mineral subsoils stripping of peat will not take place during extremely wet periods as defined in the Chapter 9 of this EIAR (to prevent increased silt rich runoff). Temporary drainage systems will be required to limit runoff impacts during the construction phase.  During tree felling, brash mats will be used to support vehicles on soft ground, reducing peat and mineral soils erosion and avoiding the formation of rutted areas, in which surface water ponding can occur. Brash mat renewal will take place when they become heavily used and worn. Provision will be made for brash mats along all off-road routes, to protect the soil from compaction and rutting.			
Biodiversity						
MM56	Potential Effects on Peatlands and Associated Habitats	EIAR Chapter 6	The proposed development has been deliberately designed to minimise loss of Upland blanket bog (PB2). Where the development footprint does occur on this habitat at Turbine 1, the proposed development provides for the replacement of peatland habitat through the restoration of forestry (WD4) back to peatland, located adjacent to Turbine 7. This is fully described in the site-specific Biodiversity Management Plan (BMP), provided in Appendix 6-5 of the EIAR. The BMP aims to ensure that there will be no net loss of peatland habitat associated with the proposed development. This has been further developed by the inclusion of an additional peatland enhancement area comprising of degraded Upland blanket bog (PB2) located to the north of Turbine 7. It is proposed to undertake enhancement of this area of peatland through drain blocking and the removal of encroaching conifers (establishing as a result of natural seed dispersal). The location and extent of the habitat replacement and enhancement areas located adjacent to T7 are mapped in the Biodiversity Management Plan, Appendix 6-5 of the EIAR			
MM57	Badger	EIAR Chapter 6	<ul> <li>An exclusion zone will be put in place along the section of haul road during the construction phase to ensure works are not undertaken within 30 metres of a known badger sett on site (known to be approx. 40 metres from the proposed footprint).</li> <li>No works should be undertaken within 150m of any holts at which breeding females or cubs are present.</li> </ul>			