



White Hill Wind Farm

Environmental Impact Assessment Report

Chapter 1: Introduction

White Hill Wind Limited

Galetech Energy Services

Clondargan, Stradone, Co. Cavan Ireland

Telephone +353 49 555 5050

www.galetechenergy.com



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1.1 Introduction

This Environmental Impact Assessment Report (EIAR) has been prepared by Galetech Energy Services Limited (GES) on behalf of White Hill Wind Limited ('the Developer') to inform the Environmental Impact Assessment (EIA) to be carried out in respect of a Strategic Infrastructure Development (SID) planning application submitted direct to An Bord Pleanála pursuant to Section 37E of the *Planning & Development Act 2000* (as amended) ('the Act').

The project¹ comprises a proposed wind farm, consisting of 7 no. turbines with a total generated electricity output of 50.4 megawatts (MW) and all associated site development and ancillary works.

Off-site and secondary elements of the project which are included for assessment in this EIAR include temporary and permanent upgrade works to be undertaken to the turbine component haul route. The project also comprises electrical infrastructure to connect the proposed wind farm to the national electricity network at the existing Kilkenny 110kV electricity substation, located c. 4 kilometres (km) southeast in the townland of Scart, via an underground electricity line of approximately 15km in length².

The wind farm site traverses the administrative boundary between counties Carlow and Kilkenny; with 4 no. turbines located in Co. Carlow and 3 no. turbines within Co. Kilkenny. The electricity substation is located within Co. Carlow while the vast majority, c. 14km, of the underground electricity line is located in Co. Kilkenny.

1.1.1 What is Environmental Impact Assessment (EIA)?

EIA is a process required by the European Union (EU) Environmental Impact Assessment Directive 2011/92/EU, as amended by 2014/52/EU, and transposed into Irish law by way of Part X of the *Planning & Development Act 2000* (as amended).

EIA is carried out by the relevant competent authority, in this case An Bord Pleanála, to ensure that projects, where the likelihood of significant effects on the environment cannot be excluded, are subject to a comprehensive and independent examination, analysis and evaluation of their likely significant effects on the environment; including the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects; of both their construction and operational phases, prior to being granted planning permission (Development Consent).

EIA is fully integrated into the SID planning application process and helps to ensure that decisions to grant or refuse planning permission for proposed developments are made in the full knowledge of their likely significant effects on the environment, including through consultation with the public concerned.

¹ For the purposes of this EIAR, the terms 'project', 'development', 'proposed development', 'project site', 'proposed development site', 'site', and any variation thereof, are used interchangeably throughout and encompass and refer to the entire project being assessed including wind turbines and associated secondary and off-site developments, such as grid connection infrastructure, haul route upgrade works and all elements referred to in **Chapter 3**. Specific components of the project; for example, 'wind farm' or 'grid connection'; are explicitly referenced, where relevant.

² It should be noted that, in order to ensure assessment of any likely significant indirect, secondary or cumulative environmental effects, not all elements of the project assessed within this EIAR will be the subject of a single planning application. Therefore, this EIAR should be read in conjunction with the applicable planning application documentation.

1.1.2 What is an Environmental Impact Assessment Report (EIAR)?

An EIAR is a written statement prepared by the Developer of the likely significant effects, if any, which the project, if carried out, will have on the environment. The EIAR consists of a systematic analysis of the project, including its construction, operational and decommissioning phases, in relation to the existing environment. It is an iterative process carried out throughout the full lifecycle of the project design and consenting process so as to allow for preventative and ameliorative action, as necessary, at a point in time when changes can still be made to the project that anticipate, avoid and mitigate any likely significant effects foreseen.

The EIAR is the principal document that informs the EIA process and provides integral information which An Bord Pleanála can use; amongst other considerations, including, where appropriate, its own supplementary assessments; in independently undertaking EIA and informing its decision to grant (including subject to conditions and/or modifications) or to refuse planning permission, and/or to seek further information from the Developer.

The EIAR can also be used by third parties, including members of the public concerned, as part of the public participation process, to evaluate the project and its likely significant environmental effects, and to inform any submissions made to the SID planning application process.

1.2 SID Status

SID is development which is of strategic national or regional importance where a planning application must be made directly to An Bord Pleanála in the first instance pursuant to Section 37E of the Act, and not to the local Planning Authority via Section 34, as would be the normal course.

Wind energy installations for the generation of electricity may be considered SID should the size of the project, either in terms of turbine numbers or electrical capacity, exceed the thresholds set out at the Seventh Schedule of the Act. The threshold for wind energy developments is more than 25 no. turbines or having a total output greater than 50 megawatts (MW). Prior to submitting a SID planning application, a project must firstly be the subject of pre-application consultations with An Bord Pleanála pursuant to Section 37B of the Act to determine whether it constitutes SID, or not pursuant to the criteria set out in Section 37A.

As the project design process was progressed and the preferred turbine type was identified, it became apparent that the total output of the project was likely to exceed 50 megawatts (MW) and that the project may be considered to be a SID. Accordingly, the Developer entered into pre-application consultations (Reference ABP-312224-21) with An Bord Pleanála who, subsequently, determined that, in accordance with the report of its Inspector, the project constitutes a SID and that an application for permission must be made directly to An Bord Pleanála (see **Section 1.10**).

1.3 Screening

The first stage of the EIA process involves deciding whether an EIA needs to be undertaken or not. This ensures that EIA is only undertaken for projects where the likelihood of significant effects on the environment cannot be excluded. In carrying out this screening exercise, and preparing this EIAR, the Developer has had regard to *Environmental Impact Assessment of Projects: Guidance on Screening* (2017) published by the European Commission, *Guidelines on the information to be*

contained in *Environmental Impact Assessment Reports (2022)* published by the Environmental Protection Agency (EPA) and the *OPR Practice Note PN02 Environmental Impact Assessment Screening (2021)* published by the Office of the Planning Regulator.

1.3.1 EIA Classes & Thresholds

In accordance with the provisions of the Act, EIA is mandatory when certain prescribed classes of projects exceed specific sizes and thresholds. Planning applications for such projects must be accompanied by an EIAR.

Schedule 5 of the *Planning and Development Regulations 2001 (as amended)* ('the Regulations') provides that the following class of development proposal shall be subject to EIA:-

"Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts"

As the project consists of 7 no. wind turbines and will have a total output in excess of 5MW, it is therefore of a scale which exceeds the mandatory threshold for EIA. Accordingly, this EIAR has been prepared and submitted with the planning application.

1.4 Content

In order to be relevant, complete and legally compliant, the content of this EIAR includes all of the information required by the EIA Directive and national legislation, as appropriate and necessary to the specific characteristics of the project, and includes:-

- (a) A description of the project comprising information on the site, design, size and other relevant features of the project;
- (b) A description of the likely significant effects of the project on the environment;
- (c) A description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- (d) A description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;
- (e) A non-technical summary of the information referred to in points (a) to (d); and,
- (f) Any additional information specified in Annex IV of the EIA Directive relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected.

1.5 Format

The EIAR is presented as 2 no. volumes, which should be read in conjunction with each other, as follows:-

- **Volume I** comprises the Main EIAR text and follows a 'grouped format' structure whereby each environmental factor is assessed and presented as a separate chapter. The EIA Directive prescribes the range of environmental factors which should be used to organise descriptions of the environment and likely significant environmental effects. These have been supplemented with

additional environmental factors owing to the characteristics of the project under assessment, as follows:-

- Chapter 1: Introduction;
 - Chapter 2: Assessment of Project Alternatives;
 - Chapter 3: Description of the Project;
 - Chapter 4: Population & Human Health;
 - Chapter 5: Biodiversity;
 - Chapter 6: Land & Soils;
 - Chapter 7: Water;
 - Chapter 8: Air Quality & Climate;
 - Chapter 9: Landscape;
 - Chapter 10: Cultural Heritage;
 - Chapter 11: Noise & Vibration;
 - Chapter 12: Shadow Flicker;
 - Chapter 13: Material Assets; and,
 - Chapter 14: Interactions of the Foregoing.
- **Volume II** comprises a range of annexes, including technical data and reports, which informed the impact assessment provided in **Volume I** so as to ensure the EIA is transparently supported by evidence.

A **Non-Technical Summary** of the EIA is also provided as a separate standalone volume in order to facilitate the wider public concerned in their involvement in the statutory consultation process during the EIA and planning application determination stage.

1.6 Structure

In order to provide for a consistent approach and to communicate clear, concise, unambiguous information, each chapter of this EIA is systematically organised so as to follow a similar basic structure, as follows:-

- **The existing environment:** A description of the context, character, significance and sensitivity of the receiving (baseline) environment using standard descriptive methods, in order to predict the likely significant effects of the project;
- **The likely significant impacts of the project:** The aspects of the construction, existence and operation of the project that are likely to affect the existing environment including, as appropriate, predicted, potential, residual, 'do nothing' and 'worst case' effects. The likely significance of any effects is determined with reference to magnitude, intensity, integrity, duration and probability; and,
- **The measures to mitigate and monitor adverse effects:** The range of methods which are proposed for mitigation by avoidance, reduction and remedy of any likely significant effects (including unplanned events) together with ongoing monitoring of the efficacy of mitigation measures.

This systematic structure, which clearly separates data (descriptions of the receiving environment and of the project) from impact predictions (likely significant effects, mitigation measures and residual effects), is designed to ensure that replicable impact assessments, based on rigorous scientific information and verifiable evidence, are carried out using recognised methods that are presented and documented in a fully legible, transparent and objective manner.

This methodological structure also reduces potential for subjective information and bias, to facilitate the Planning Authorities in their independent EIA of the project.

1.7 Guidance

A range of general statutory and non-statutory guidance documents were consulted in undertaking and preparing this EIAR, including *inter alia*:-

- *Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report* (European Commission, 2017)
- *Environmental Impact Assessment of Projects: Guidance on Screening* (European Commission, 2017);
- *Environmental Impact Assessment of Projects: Guidance on Scoping* (European Commission, 2017)
- *Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions* (European Commission, 1999);
- *Interpretation suggested by the Commission as regards the application of the EIA Directive to ancillary/associated works* (European Commission, 2012);
- *Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment* (European Commission; 2013);
- *Guidelines on the information to be contained in Environmental Impact Assessment Reports* (EPA, 2022);
- *Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports* (EPA, 2017);
- *Draft Advice Notes for preparing Environmental Impact Statements (Project Type 33)* (EPA, 2015);
- *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment* (DoHPCLG, 2018 [updated in 2019]);
- *Guidelines for Environmental Impact Assessment of Electricity Transmission Projects* (EirGrid, various);
- *Wind Energy Development Guidelines for Planning Authorities* (DoEHLG, 2006);
- *Review of the Wind Energy Development Guidelines – Preferred Draft Approach* (DoHPCLG, 2017);
- *Draft Revised Wind Energy Development Guidelines* (DHPLG, 2019);
- *Best Practise Guidelines for the Irish Wind Energy Industry* (IWEA, 2012);
- *Guidelines for Ecological Impact Assessment in the UK and Ireland* (CIEEM, 2018) [updated in 2019]; and,
- *Electricity Transmission Studies Evidence-Based Environmental Studies* (EirGrid, various).

The above is a general and non-exhaustive list of EIAR-related guidance. Additional guidance documents, specific to each environmental topic, are referenced in each chapter of this EIAR, as relevant.

1.8 EIAR Project Team

The EIA Directive requires that an EIAR must be prepared by a team of competent, qualified experts with an appropriate combination of experience, expertise and knowledge related to the significance, complexity and range of effects that an EIAR needs to assess. Such competence includes an understanding of the legal context of the decision-making process and a variety of technical experts to address different environmental topics, and their interactions, in order to ensure that the information included in the EIAR is complete to a high level of objective quality.

1.8.1 Project Management

GES has been appointed by the Developer to manage and co-ordinate the preparation of this EIAR. GES is an Irish multi-disciplinary renewable energy consultancy that specialises in the project management of planning, environmental and technical engineering services of wind energy developments from project feasibility through to delivery and operation. GES combines the expertise of leading experts in wind farm design, planning and environmental assessment and has extensive experience in managing and coordinating EIAR projects for wind energy and associated electricity grid and substation developments. Some examples of wind energy and ancillary EIAR projects managed by GES are provided in **Table 1.1** below.

Development	Planning Register Reference	Development Description	Status
Carrickallen Wind Farm, Co. Cavan	Cavan County Council Planning Register Reference 09/280 (An Bord Pleanála Reference PL02.235597) & various others	Wind Farm comprising 10 no. wind turbines and associated ancillary infrastructure.	Operational
Oldmill Wind Farm, Co. Monaghan	Monaghan County Council Planning Register Reference 10/485 & various others	Wind Farm comprising 7 no. wind turbines and associated ancillary infrastructure.	Operational
Taghart Wind Farm, Co. Cavan	Cavan County Council Planning Register Reference 16/74 (An Bord Pleanála Reference PL02.247401) & various others	Wind Farm comprising 7 no. wind turbines and associated ancillary infrastructure.	Operational
Taghart Wind Farm Grid Connection, Co. Cavan & Co. Meath	Cavan County Council Planning Register Reference 17/502 (An Bord Pleanála Reference ABP-301717-18) & Meath County Council Planning Register Reference KA171177 (An Bord Pleanála Reference ABP-301742-18)	Approximately 12km of underground electricity line located predominately within the carriageway of the public road network.	Operational
Cloghan Wind Farm, Co. Offaly	Offaly County Council Planning Register Reference 14/188 (An Bord Pleanála Reference PL19.244053) & Offaly County Council Planning Register Reference 19/404	Wind Farm comprising 9 no. wind turbines and associated ancillary infrastructure.	In Construction
Cloghan Wind Farm Grid Connection,	Offaly County Council Planning Register Reference 19/555	Approximately 8km of underground electricity line located predominately within the carriageway of	In Construction

Co. Offaly		the public road network.	
Pinewoods Wind Farm, Co. Laois	Laois County Council Planning Register Reference 16/260 (An Bord Pleanála Reference PL11.248518) & Kilkenny County Council Planning Register Reference 17/62 (An Bord Pleanála Reference PL10.248392)	Wind Farm comprising 11 no. wind turbines and associated ancillary infrastructure.	Permitted
Pinewoods Wind Farm Substation & Grid Connection	An Bord Pleanála Reference ABP-308488-20	110kV electricity substation and ancillary electrical infrastructure and all associated site development works.	Permitted
Drumlins Park Wind Farm, Co. Monaghan	Monaghan County Council Planning Register Reference 19/486	Wind Farm comprising 8 no. wind turbines and associated ancillary infrastructure.	In Construction
Drumlins Park Wind Farm Substation & Grid Connection, Co. Monaghan	An Bord Pleanála Reference ABP-309119-21	110kV electricity substation and ancillary electrical infrastructure and all associated site development works.	In Construction
Bracklyn Wind Farm, Substation & Grid Connection	An Bord Pleanála Reference ABP-311565-21	Wind Farm comprising 9 no. wind turbines and associated ancillary infrastructure including a 110kV electricity substation and approximately 6km of underground electricity line.	Permitted

Table 1.1: Examples of EIAR Wind Energy Developments managed by GES

1.8.2 Environmental Specialists

The EIAR is also critically dependent on the technical expertise, experience, independence and objectivity of environmental specialists. They characterise the existing environment, evaluate its sensitivity and the likely significant effects of the project.

An overview of the specialist experts involved in the preparation of each chapter of this EIAR, together with their relevant qualifications and key environmental factors covered, is provided in **Table 1.2** below. Some specialisms were provided in-house by GES expert staff while, in other cases, external specialists were appointed as expert consultants in order to undertake individual assessments and prepare specific chapters on environmental topics.

Each appointed specialist is a recognised expert in their field and was selected having regard to their knowledge of relevant environmental legislation; their experience and involvement in EIAR projects for wind energy developments; familiarity with pertinent standards and criteria for the evaluation and classification of significance of effects; the ability to interpret technical documents and to work with project designers to arrive at practical and reliable measures to avoid, mitigate

and monitor likely significant effects; and to clearly and comprehensively present their findings in a concise and objective manner. A statement of competence for all of the specialist consultants who contributed to the preparation of this EIAR is provided in each individual chapter of this EIAR, as appropriate.

As part of its project management role, GES undertook overall editorial management of the EIAR to ensure consistency and cross-referencing between different chapters and volumes, and identifying likely interactions between separate environmental factors, together with general project management, briefing and steering of specialist consultants throughout the iterative EIAR and design process.

Ch.	Environmental Topic	Specialist Consultant	Personnel
1	Introduction	GES	Gavin Daly <i>BA Dip MIPI</i>
2	Assessment of Project Alternatives , including: <ul style="list-style-type: none"> • Alternative Sites; • Alternative Technologies; and, • Alternative Project Designs. 	GES	Simon Carleton <i>BA MSc MIPI</i> Bláithín Rafferty <i>MPlan</i>
3	Description of the Project , including: <ul style="list-style-type: none"> • Wind Farm; • Turbine Component Haul Route; • Grid Connection; and, • Construction Materials & Aggregates. 	GES	
4	Population & Human Health , including: <ul style="list-style-type: none"> • Employment; • Human Health (considered with reference to benchmark standards under other chapters such as noise, shadow flicker, air quality etc.); and, • Amenity. 	GES	
5	Biodiversity , including: <ul style="list-style-type: none"> • Habitats • Birds • Bats • Non-volant mammals; and, • Aquatic ecology 	Ecology Ireland	Gavin Fennessy <i>MSc MSc (Arch) CEcol MCIEEM</i> Others <i>Various</i>
6	Land & Soils , including: <ul style="list-style-type: none"> • Superficial Geology; • Bedrock Geology; • Geological Heritage & Designated Sites; and, • Soil Contamination. 	Hydro-Environmental Services	Michael Gill <i>P. Geo., B.A.I., MSc, Dip. Geol., MIEI</i> David Broderick <i>BSc, H.Dip Env Eng, MSc</i>
7	Water , including: <ul style="list-style-type: none"> • Local & Regional Hydrology; • Flood Risk; • Hydrogeology; • Ground/Surface physical characteristics; and, • Drainage Management. 	Hydro-Environmental Services	Michael Gill <i>P. Geo., B.A.I., MSc, Dip. Geol., MIEI</i> David Broderick <i>BSc, H.Dip Env Eng, MSc</i>
		Fehily Timoney & Company (peat stability risk)	Ian Higgins <i>BSc MSc</i>

		assessment)	
8	Air Quality & Climate , including: <ul style="list-style-type: none"> • Air Quality; • Climate; • Dust; • Greenhouse gas emissions; and, • Contribution of the project to binding targets. 	AWN Consulting	Niamh Nolan <i>BSocSci</i>
9	Landscape , including <ul style="list-style-type: none"> • Landscape Character; • Views & Prospects • Landscape Impact; and, • Visual Impact. 	Macro Works	Richard Barker <i>MLA MILI</i> Cian Doughan <i>BSLA MILI</i>
		GES (photomontages)	Joseph Buckley <i>BSc MSc</i> Cormac McPhillips <i>BSc</i>
10	Cultural Heritage , including <ul style="list-style-type: none"> • Known archaeological monuments; • Areas of archaeological potential (including unknown archaeology); • Architectural heritage; and, • Designations or sensitivities 	Dermot Nelis Archaeology	Dermot Nelis <i>BA ArchOxon AIFA MIAI</i>
11	Noise & Vibration , including <ul style="list-style-type: none"> • Daytime Noise; • Night time Noise; • Vibration sources; and, • Sensitive receptors. 	AWN Consulting	Mike Simms <i>BE MEngSc MIOA MIET</i>
		GES (noise monitoring)	Cormac McPhillips
12	Shadow Flicker , including <ul style="list-style-type: none"> • Worst Case Effects; • Expected Effects; and, • Mitigation Measures. 	GES	Cormac McPhillips Gavin Daly Simon Carleton Bláithín Rafferty
13	Material Assets , including <ul style="list-style-type: none"> • Transport & Access; • Aviation; • Telecommunications; and, • Resources & Utility Infrastructure. 	GES	Gavin Daly Simon Carleton Bláithín Rafferty
14	Interaction of the Foregoing	GES	Gavin Daly Simon Carleton Bláithín Rafferty
Non-Technical Summary		GES	Gavin Daly Simon Carleton

Table 1.2: Specialist Consultants involved in the preparation of this EIAR

1.9 Scoping

The scoping process involves identifying the environmental factors that are likely to be significant during EIA and eliminates those that are not. The scoping process is highly interrelated with the consultation process as described in **Section 1.10** below. The prior determination of the nature and detail of the information to be contained in the EIAR is one of the most important stages of EIA and may be conducted through a formal or informal process. Scoping helps ensure that the EIAR remains focussed on factors that are environmentally based, likely to occur and may have likely significant and adverse effects.

In undertaking scoping, the statutory obligations as set out in Schedule 6 of the Planning & Development Regulations 2001 (as amended) ('the Regulations') and a range of guidance documents were consulted, including those referenced in **Section 1.6**. A desktop analysis was undertaken of relevant data sources and precedents of EIAs carried out for similar developments, together with other relevant policy documents; such as the *Carlow County Development Plan 2022-2028*, and *Kilkenny City & County Development Plan 2021-2027*; and all accompanying Strategic Environmental Assessments (SEAs) prepared pursuant to Directive 2001/42/EC.

1.9.1 Scoping Report

As part of the scoping process, a 'Preliminary Scoping Report' was prepared to provide an overview of the project context; description of the baseline environment; alternatives considered; the project; its possible likely significant environmental effects; and mitigation and monitoring measures. This report was used in the course of the consultation process, as described in **Section 1.10** below, to allow consultees to inform themselves of the scope of the project and possible environmental effects, and to invite comments on the information which should be included in the EIAR, so that a focused and robust EIAR is produced.

The scoping process also included an assessment of relevant 'secondary' or 'off-site' developments including:-

- The project's connection to the national grid (in accordance with the judgement of the High Court in respect of *O'Granna & Ors v An Bord Pleanála* ([2014] IEHC 632);
- Indirect impacts in respect of the importation of aggregates and materials to be used in the construction phase;
- Transport and access considerations, including the road haul route for turbine components; and,
- The felling of forestry within the project site and off-site replanting.

In addition to EIA, scoping for the potential for any significant effects on European nature conservation sites designated under the EU Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC) was undertaken through the preparation of an Appropriate Assessment (AA) Screening Report. The AA Screening Report concluded that it could not be confirmed that, in the absence of avoidance or reduction measures, designated Natura 2000 conservation sites would not be adversely affected by the project. As a result of these scoping and screening processes, it was determined that the project should be subject to a Stage 2

Appropriate Assessment and that a Natura Impact Statement (NIS) should be prepared and submitted with the planning application.

Following the completion of the preliminary environmental scoping process, a detailed Scoping Report (see **Annex 1.1**) was prepared which details the findings of the scoping exercise, including an environmental constraints analysis and consultation with stakeholders, prescribed bodies, and the local community. This Scoping Report was continually reviewed by the EIAR Project Team throughout the preparation of this EIAR to ensure that all constraints identified therein were fully assessed or, where possible, that the project was adapted to avoid or reduce likely significant environmental effects.

1.9.2 Formal Scoping

Section 37D(1) of Act provides for a discretionary provision whereby a prospective applicant during pre-application consultations with An Bord Pleanála may formally request an opinion on the scope and level of detail to be included in the EIAR. In this case, no formal scoping was considered necessary. In the course of pre-application consultations, An Bord Pleanála gave advice to the Developer, both during consultations and through the published Inspector's Report, on the considerations related to the likely significant environmental effects which may have a bearing on its decision in relation to any subsequent SID planning application.

1.9.3 Informal Scoping

Informal scoping was carried out through ongoing iterative dialogue and feedback processes between the EIAR Project Team and the Developer's project design team, and through the feedback received from the consultation process. Informal scoping was considered the most appropriate means of EIAR scoping in this case, as it was envisaged from the outset that no environmental factors would be scoped out or eliminated from the EIAR. Accordingly, no formal scoping was considered necessary and all environmental factors, as prescribed in the transposing legislation, have been fully addressed and included in this EIAR, as described in **Section 1.4** above.

As an active, iterative process, scoping continued throughout the preparation of the EIAR, including during the impact assessment stage, and the EIAR Project Team maintained a flexible view of the scope throughout, by way of open, effective and ongoing communication, and consultation. The project design was dynamically informed and continually reviewed in light of environmental criteria and information emerging during the scoping process, and *vice versa*. This process resulted in the effective anticipation of any likely significant environmental effects and the consequent modification of the project to avoid or reduce effects through redesign and identification of mitigation measures. This process has resulted in the assessment and consideration of a number of reasonable alternatives as described in **Chapter 2**.

1.10 Consultation

1.10.1 Pre-Application Consultations

As discussed in **Section 1.2** above, the project was the subject of mandatory pre-application consultation with An Bord Pleanála. As prescribed by legislation, the purpose of the pre-application consultations was twofold. Firstly, to determine whether the project constituted SID; and if so, secondly, to give advice to the Developer on the procedures involved in making such an application and what considerations, related to proper planning and sustainable development or the likely

significant environmental effects, in the opinion of An Bord Pleanála, may have a bearing decision in relation to any subsequent SID planning application.

A meeting was held between the Developer and An Bord Pleanála on 13 April 2022. During this meeting, the evolution of the project was described in detail; including the site selection process, environmental scoping and constraints analysis, and details of stakeholder consultation; while advice was given to the Developer on key factors which would be relevant as part of the EIAR for any subsequent SID planning application including:-

- Landscape & visual effects;
- Assessment of project alternatives;
- Connection to the national electricity grid;
- Ecological impacts, including potential effects on designated sites;
- Residential amenities;
- Ground conditions and the presence of rock and/or peat; and
- Cumulative effects with other developments, including wind farms.

A copy of the meeting record was subsequently furnished to the Developer (see **Annex 1.2, Volume II**).

In issuing its determination that the proposed development constitutes SID, An Bord Pleanála advised the Developer in relation to the planning application procedures and also provided a list of prescribed bodies which were considered relevant and to be consulted with by the Developer (see **Annex 1.3, Volume II**). Each of these prescribed bodies has also been notified by the Developer in relation to the planning application for the proposed development.

1.10.2 Planning Authority Consultations

As part of the pre-application consultation process; An Bord Pleanála identified Carlow County Council and Kilkenny County Council, as the applicable planning authorities for the project site, as relevant prescribed bodies for the purposes of EIAR consultation.

A scoping request was issued to Carlow County Council on 23 April 2021 and included the 'Preliminary Scoping Report' described at **Section 1.9.1** above, in order to provide the Planning Authority with sufficient information on the project and its possible environmental effects. A response was received (see **Annex 1.4, Volume II**), dated 10 June 2021; and referred to matters including cumulative impacts, statutory planning policy, natural & built heritage, residential amenity, noise & vibration, dust, water, and transport & access.

Separately, a scoping request was also issued to Kilkenny County Council on 23 April 2021 and, again, included the 'Preliminary Scoping Report' described above. A response was received (see **Annex 1.5, Volume II**), on 23 November 2021 advising that the Developer engage directly with a number of bodies; that the Developer engage in pre-planning consultation with the Planning Authority; and referred to matters including cultural heritage, transport & access, statutory planning policy, land & soil, residential amenity, noise & vibration, shadow flicker, and biodiversity.

A consultation meeting with Kilkenny County Council (Planning Department) was held (online); dated 29 March 2022³. During the meeting, the project was described in detail together with the relevant environmental factors; including, *inter alia*,

³ It should be noted that consultation meetings were offered to Carlow County Council (Planning Department) on a number of occasions; however, these offers were not availed of.

population & human health (proximity to residential dwellings), biodiversity, transport, flooding, and landscape and visual amenity; to be addressed in the EIAR. Other matters discussed during the meeting included the provisions of the *Kilkenny City & County Development Plan 2021-2027*, the project's connection to the national electricity grid, and community consultation. A written record of the meeting is enclosed at **Annex 1.6 (Volume II)**.

1.10.3 Stakeholder & Prescribed Body Consultations

A wide range of statutory and non-statutory organisations, including all bodies prescribed in the Regulations, were contacted in writing at early stage in the scoping process to gather their views on the EIAR scope and the likely significant environmental effects of the project. The consultation process involved furnishing, in April 2021, each organisation with the 'Preliminary Scoping Report' described above, accompanied by a set of maps and drawings, and requesting written feedback. Where a consultee did not respond, it has been assumed that they have no specific comment to make in relation to the project or the scope of the EIAR.

Annex 1.7 (Volume II) provides a sample copy of the consultation letter issued to each organisation, while a copy of all responses received is enclosed at **Annex 1.8 (Volume II)**. **Table 1.3**, below, lists all organisations which have been consulted, details whether or not a response was received and provides a summary of the content contained therein. The specific prescribed bodies identified by An Bord Pleanála as relevant and to be consulted by the Developer are also identified.

While the consultation undertaken to date has allowed for any identified concerns to be addressed within this EIAR; the statutory consultation process, to be commenced following submission of the SID planning application to An Bord Pleanála, will allow these organisations to make any further comments, as necessary.

Consultee	Response Received	Summary of Feedback	Prescribed Body per SID Determination
Airspeed Telecom	No	-	-
An Garda Síochána	No	-	-
An Taisce	No	-	Yes
Ajisko Ltd	No	-	-
Bat Conservation Ireland	Yes	No specific comment.	-
Birdwatch Ireland	No	-	-
Bord Gáis Energy	No	-	-
Broadcasting Authority of Ireland	Yes	The project is not located close to any existing or planned transmission site.	-
BT Communications Ireland	Yes	The project will not affect the BT Ireland microwave network.	-
Carlow County Council	Yes	Comments made in relation to the assessment of cumulative effects with the project's grid connection, planning policy, natural & built heritage, residential amenity, noise & vibration, biodiversity, water quality & surface water management, and traffic management.	Yes
Commission for Communications Regulation	Yes	No specific comments on the project and referred the Developer to a number of service providers.	-
Commission for Regulation of Utilities	No	-	Yes
Department of Agriculture, Food and the Marine	Yes	Felling Licence to be obtained should the project require trees to be felled or removed. Advice offered in relation to Felling and Reforestation Policy.	Yes
Department of Environment, Climate and Communications	No	-	Yes
Department of Defence	No	-	-

Consultee	Response Received	Summary of Feedback	Prescribed Body per SID Determination
Department of Housing, Local Government and Heritage (c/o Development Applications Unit)	No	-	Yes
Department of Transport	No	-	No
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No	-	Yes
Eir Ltd	Yes	No transmission service will be affected by the project.	No
EirGrid	No	-	No
Enet	Yes	Following the implementation of agreed mitigation measures, the service will not be affected.	No
Environmental Protection Agency	No	-	No
ESB	Yes	No radio network service will be affected by the project.	No
Fáilte Ireland	Yes	No specific comments on the project. Recommendation that Failte Ireland's <i>Guidelines for the treatment of Tourism in an EIS</i> be taken into account.	Yes
Gas Networks Ireland	Yes	No specific comments on the project.	No
Geological Survey Ireland	Yes	Recommend that databases maintained by Geological Survey Ireland in relation to geo-hazards, geo-heritage and groundwater features be considered in the EIAR. GSI also requests that detailed consideration be given to possible effects on groundwater given the presence of important aquifers which supply drinking water to local public and group water schemes.	No
Health and Safety Authority	No	-	No
Health Service Executive – Environmental Health Department	No	-	Yes

Consultee	Response Received	Summary of Feedback	Prescribed Body per SID Determination
Iarnród Éireann	No	-	No
Imagine Group	Yes	No service will be affected by the project.	No
Inland Fisheries Ireland	No	-	Yes
Irish Aviation Authority	Yes	Requests that the Developer engage with the IAA ANSD at least thirty days in advance of erecting a manmade object. No specific concerns raised and the IAA suggest the imposition of a planning condition relating to warning lighting and the provision of as-built information to the IAA.	Yes
Irish Peatland Conservation Council	No	-	No
Irish Raptor Study Group	No	-	No
Irish Water	Yes	General comments relating to the protection of water services and water quality.	No
Irish Wildlife Trust	No	-	No
JFK Communications Ltd	No	-	No
Kildare FM Radio Ltd	No	-	No
Kilkenny County Council	Yes	Provided a list of prescribed bodies which were to be consulted with. Comments also made in relation to natural & built heritage; transport, access, and traffic management; planning policy; land & soil; human health; residential amenity; biodiversity; and water quality & surface water management.	Yes
National Ambulance Service	No	-	No
National Federation of Group Water Schemes	Yes	Provided details of group water scheme infrastructure in the local area and request that the presence of water infrastructure be assessed in the EIAR.	No
National Parks & Wildlife Service	No	-	No

Consultee	Response Received	Summary of Feedback	Prescribed Body per SID Determination
Netshare Ireland	No	-	No
Sport Ireland Outdoors (National Trails Office)	No	-	No
Office of Public Works	No	-	Yes
Open Eir	No	-	No
Ripplecom	No	-	No
Radio Services and Buildings Ltd	Yes	The proposed development poses a risk to local road broadcasting services due to interference with radio links between Kilkenny & Carlow.	No
2rn (RTE Transmission Network Ltd)	Yes	Risk of localised interference with digital terrestrial television and request that an interference remediation protocol be put in place.	No
Southern Regional Assembly	No	-	Yes
Sustainable Energy Authority of Ireland	No	-	No
Tetra Ireland Communications Ltd	Yes	The project is not anticipated to impact any telecommunications network.	No
The Arts Council	No	-	Yes
The Heritage Council	No	-	Yes
Three (3) Ireland	Yes	The project is not anticipated to impact any telecommunications network.	No
Towercom	No	-	No
Transport Infrastructure Ireland	Yes	Provides general guidance for impact assessment and offers advice in relation to the design/assessment of elements of the project which interact with the national road network.	Yes
Údarás na Gaeltachta	No	-	No

Consultee	Response Received	Summary of Feedback	Prescribed Body per SID Determination
Virgin Media Ireland	No	-	No
Viatel Ireland Ltd	No	-	No
Vodafone Ireland Ltd	Yes	While Turbine B (now known as Turbine T2) is in close proximity to an existing telecommunication link, no impact is anticipated.	No
Waterways Ireland	No	-	No

Table 1.3: Summary of Written Consultations

1.10.4 Community Consultation & Participation

1.10.4.1 Non-Statutory Consultation

Consultation is a key element of each stage of the EIA process and there are procedures for statutory public consultation at various stages in the EIA process. While it is not obligatory during the scoping and preparation of an EIAR, the Developer has undertaken extensive public consultation throughout the development design and EIAR process. In compliance with prevailing public health guidance arising from the COVID-19 pandemic, the Developer sought to facilitate public consultation, in early 2021, via remote means which generally comprised written correspondence or telephone correspondence. During the subsequent period of reduced public health restrictions, the Developer completed door-to-door visits with local residents and held a number of consultation clinics where individual members or families were afforded the opportunity to discuss the project directly with the project team. A full report on the public consultation process undertaken by the Developer is presented at **Annex 1.9 (Volume II)**. This approach is now recommended as standard per the *Draft Revised Wind Energy Development Guidelines 2019*.

The public consultation process undertaken facilitated the early identification of potential concerns of the public concerned in respect of the project and a more focused consideration of likely significant effects, including the identification of design modifications and opportunities to incorporate mitigation measures into the design process.

1.10.4.2 Statutory Consultation

Once the SID planning application and EIAR is formally submitted for consideration; the Developer, An Bord Pleanála, Carlow County Council and Kilkenny County Council will make arrangements for public access to, and dissemination of, the information contained in the EIAR in accordance with the procedures contained in the transposing legislation and as described in **Section 1.15** below.

1.11 Cumulative Impact

This EIAR has assessed the likelihood of the project, in its totality including secondary and off-site developments, acting in combination with other existing, permitted and proposed developments in the wider vicinity of the project site, to result in likely effects on the environment which, when combined, may result in impacts which are cumulatively significant.

In the first instance, a desktop review of available data sources (e.g. satellite imagery) was undertaken to identify existing developments in the local area. Secondly, the EIA Portal⁴ was consulted to assess for the presence of proximate developments which have been subject to EIA. Finally, the respective online ePlan portals for Carlow County Council⁵ and Kilkenny County Council⁶ were examined to assess for extant planning permissions which had not yet been commenced. Developments warranting a cumulative impact assessment range from one-off rural dwellings to large scale intensive agricultural units, commercial forestry plantations, quarrying activities, and other wind energy developments. **Table 1.4**, below,

⁴ <http://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1>

⁵ <http://www.eplanning.ie/CarlowCC/searchtypes>

⁶ <http://www.eplanning.ie/KilkennyCC/searchtypes>

provides a list of developments which have been considered in the cumulative impact assessment of this EIAR.

Development	Planning Register Reference	Development Description	Status
Firtree Developments Industrial Buildings, Co. Carlow	19/313	4 No. industrial buildings	Permitted
Kellymount Quarry (Kilkenny Limestone), Co. Kilkenny	05/1927, 06/1927, 12/248, and 12/285	Quarry and all associated quarrying plant and machinery	Existing
Kilkenny Limestone Quarry (Oldleighlin), Co. Carlow	An Bord Pleanála Reference PL01.SU0024, 15/239, 17/64, and 18450.	Quarry and all associated quarrying plant and machinery	Existing
Gortahile Wind Farm, Co. Laois	04/935, 09/237, 09/618, and 10/7	8 no. wind turbines and all associated infrastructure	Existing
Bilboa Wind Farm, Co. Carlow	11/154 (An Bord Pleanála Reference PL01.240245), 21/15 and 22/340	5 no. wind turbines and all associated infrastructure	Permitted ⁷
Bilboa Wind Farm Grid Connection, Co. Carlow & Co. Laois	20/180 (Co. Carlow) & 20/281 (Co. Laois)	Approximately 6.6km of underground electricity cables	Permitted
Pinewoods Wind Farm, Co. Laois & Co. Kilkenny	16/260 (An Bord Pleanála Reference PL11.248518) & 22/507 (Co. Laois); and 17/62 (An Bord Pleanála Reference PL10.248392) (Co. Kilkenny)	11 no. wind turbines and all associated infrastructure	Permitted ⁸
Pinewoods Wind Farm Grid Connection, Co. Laois	An Bord Pleanála Reference ABP-308448-20	110kV electricity substation and all associated infrastructure	Permitted
Seskin Wind Farm, Co. Carlow ⁹	N/A	Up to 7 no. wind turbines and all associated infrastructure	Proposed

⁷ The Bilboa Wind Farm is currently the subject of a planning application to Carlow County Council which seeks to consolidate all elements of the project within a single planning consent. It is noted that the proposed development is not materially different to that which has previously been permitted.

⁸ The permitted Pinewoods Wind Farm is currently the subject of a planning application to Laois County Council to revise the dimensions of the permitted wind turbines and to re-locate 3 no. of the permitted wind turbines.

Freneystown Wind Farm, Co. Kilkenny ¹⁰	N/A	Up to 10 no. wind turbines and all associated infrastructure	Proposed
Ballynalacken Wind Farm, Co. Kilkenny	An Bord Pleanála Reference ABP-312016-21	9 no. wind turbines and all associated infrastructure	Proposed
Coolglass Wind Farm, Co. Laois	An Bord Pleanála Reference ABP-312016-21	13 no. wind turbines and all associated infrastructure	Proposed
Single Wind Turbine, Co. Carlow	13/322 (An Bord Pleanála Reference PL01.243964), 19/463, and 20/46	1 no. wind turbine, electrical substation, access track and all ancillary works.	Existing
Single Wind Turbine, Co. Carlow	21/254 (An Bord Pleanála Reference PL01.314517)	1 no. wind turbine, electrical substation, access track and all ancillary works.	Proposed
Agricultural Developments	Various	Various	Existing, Permitted and Proposed
Residential Dwellings	Various	Various	Existing, Permitted and Proposed
Commercial Forestry Plantations	-	-	Existing

Table 1.4: Developments addressed in cumulative impact assessment

1.12 Impact Assessment

This EIAR focuses on describing environmental effects that are both likely and significant by reference to the individual environmental factors described in **Section 1.5** and their sensitivities. In order to provide for clarity of method, language and meaning, and to accurately explain the full range of effects, the impact classification and sensitivity terminology described in the *Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, 2022)* is used in this EIAR to ensure that all likely significant effects are adequately considered and clearly and transparently communicated.

Within this EIAR, a distinction is drawn between 'impacts' and 'effects'. In accordance with the *Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2018)*, an 'impact' is an action resulting in changes to the environment (for example, the construction activities of a development removing a hedgerow). An 'effect' is the outcome on the environment from an 'impact' (for

⁹ The proposed Seskin Wind Farm is located c. 2km northeast of the subject project. At the time of writing, the design and layout of the Seskin Wind Farm remains subject to change; however, during consultation between the respective developers, current turbine coordinates and specifications have been provided.

¹⁰ The proposed Freneystown Wind Farm is located c. 4.5km southwest of the subject project. At the time of writing, the design and layout of the Freneystown Wind Farm remains subject to change; however, during consultation between the respective developers, current turbine coordinates and specifications have been provided.

example, the effects on a dormouse population from the loss of hedgerow). The effect arising from an impact may, or may not, be likely to be significant¹¹.

Significance is a concept related to the weight that should be attached to effects when decisions are made. A significant effect is an effect that is sufficiently important to require assessment and reporting so that the competent authority (An Bord Pleanála) is adequately informed of the environmental consequences of permitting a project.

Further specific guidance, legislation and technical standards for describing environmental effects, and pertinent to particular environmental topics, are also described in each individual chapter of this EIAR, as necessary.

Magnitude	Sensitivity of Receptor				
	Very High	High	Medium	Low	Negligible
Very High	Profound	Profound-substantial	Substantial	Moderate	Slight
High	Profound-substantial	Substantial	Substantial - moderate	Moderate-slight	Slight-imperceptible
Medium	Substantial	Substantial - moderate	Moderate	Slight	Imperceptible
Low	Moderate	Moderate-slight	Slight	Slight-imperceptible	Imperceptible
Negligible	Slight	Slight-imperceptible	Imperceptible	Imperceptible	Imperceptible

Table 1.5: Impact Significance Matrix

Source: *Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, 2022)*

**Categories with dark grey shading are considered to equate with 'significant' impacts/effects*

***The significance matrix provides an indicative framework from which the significance of impact is derived.*

1.13 Mitigation & Monitoring Measures

Each chapter of the EIAR includes a description of the measures proposed to avoid, prevent, reduce or offset, as appropriate, any likely significant effects on the environment together with any proposed monitoring measures in respect of both construction and operational phases. Many mitigation measures have already been incorporated into the project design at an early stage, through the iterative scoping and impact assessment processes, to avoid any likely significant environmental effects i.e. 'mitigation by design'. Monitoring measures have also been proposed, where appropriate, to demonstrate compliance with, and efficacy of, the mitigation measures proposed.

¹¹ As the purpose of this EIAR is to provide a report of the effects, if any, which the project would have on the environment, the term 'effects' is used generally throughout this EIAR.

In order to ensure clarity of the mitigation and monitoring measures proposed, all such measures are included in a compendium as a separate annex to this EIAR (see **Annex 1.10, Volume II**).

1.14 Non-Technical Summary

A short and accessible non-technical summary has also been prepared as a separate and self-contained document which can be distributed to the public concerned and who may be likely to be affected by the project.

The non-technical summary is laid out in a similar, but condensed, format to the main EIAR; i.e. describing the project, existing environment, effects, and mitigation and monitoring measures; but presented in a manner that avoids technical language, such that it is easily understandable and accessible to a layperson.

The purpose of the non-technical summary is to transparently facilitate the full public access and participation of the public concerned in the statutory consultation process following the submission of the SID planning application to An Bord Pleanála.

1.15 Public Access

Public access and participation is a core feature of the EIA process. Compliance with the Aarhus Convention and the EIA Directive requires that arrangements for public access facilitate the convenient dissemination of the information contained in the EIAR in a timely and fully transparent manner. The core objective is to ensure that the public is made as fully aware as possible, and at the earliest possible stage, of the likely significant environmental effects of the project prior to a decision being made by An Bord Pleanála.

Prior to the submission of the SID planning application, public newspaper notices will be published and site notices erected in accordance with the legislative requirements and any further directions provided by An Bord Pleanála. Full information will also be made available on how the public concerned can access the SID planning application documentation and this EIAR, and involve themselves in the decision-making process, including through making written submissions.

An Bord Pleanála, Carlow County Council and Kilkenny County Council will make arrangements for public access and dissemination of this EIAR and other SID planning application documentation in accordance with the procedures contained in the legislation. This will include making all documents available to view and purchase at the following offices:

- An Bord Pleanála (64 Marlborough Street, Dublin 1, D01 V902);
- Carlow County Council (County Buildings, Athy Road, Carlow, R93 E7R7); and,
- Kilkenny County Council (County Hall, John Street, Kilkenny R95 A39T).

URL hyperlinks to all documents will also be available on the website of An Bord Pleanála.

The centralised EIA Portal, managed by the Department of Housing, Local Government and Heritage, is a publicly accessible map-based database which provides users with access to all applications for development consent which have been accompanied by an EIAR since 16 May 2017. Following the submission of the planning application to An Bord Pleanála, the public concerned will also be able to access this EIAR via the EIA portal website. The EIAR shall be submitted in a format searchable by electronic means, in so far as practicable.

Finally, the Developer is also required to provide a dedicated website containing all of the SID planning application documentation and this EIAR. The address of this website (www.whitehillwindfarmplanning.ie) is included in the public notices described above.

1.16 Habitats Directive – Appropriate Assessment

1.16.1 Appropriate Assessment Screening (Stage 1)

As a separate but interrelated process, screening for the likelihood of any significant effects on European nature conservation sites (Natura 2000) designated under the EU Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC) was also undertaken through the preparation of what is known as an Appropriate Assessment (AA) Screening Report (Stage 1). This is formally a separate assessment process, with discrete reporting requirements, but is obviously highly interrelated with EIA.

The AA Screening Report assesses whether the preparation and submission of a Natura Impact Statement (NIS) to inform an AA (Stage 2), also to be undertaken by An Bord Pleanála as the competent authority, is required.

The AA Screening Report prepared on behalf of the Developer concluded that it could not be confirmed, in the absence of avoidance or reduction (mitigation/protective) measures, that designated conservation sites would not be adversely affected by the direct and indirect effects of the project, either individually or in combination with other plans and projects, having regard to their conservation objectives.

As a result, and in accordance with the precautionary principle, it was concluded that the project should proceed to be subject to a Stage 2 AA and that a NIS should be prepared and submitted with the planning application alongside this EIAR.

1.16.2 Natura Impact Statement (Stage 2)

The NIS is presented and submitted as a separate standalone document and accompanies the SID planning application. The NIS includes both the Stage 1 Screening Report and the Stage 2 Appropriate Assessment. The NIS concludes that the project will not, beyond reasonable scientific doubt, adversely affect the integrity of any Natura 2000 site either directly or indirectly.

The Biodiversity chapter of this EIAR (**Chapter 5**) does not repeat the detailed assessment included in the NIS but cross refers to the findings of this separate assessment, as necessary. This approach is in accordance with the EPA Guidance (2022) which states, “[a] biodiversity section of an EIAR, for example, should not repeat the detailed assessment of potential effects on European sites contained in documentation prepared as part of the Appropriate Assessment process” but should “refer to the findings of that separate assessment in the context of likely significant effects on the environment”.

1.17 Limitations and Difficulties Encountered in Compiling the EIAR

No general difficulties or limitations, including technical deficiencies or lack of knowledge, were encountered in compiling the information required to be provided in this EIAR. Where specific difficulties or limitations were encountered in relation to specific environmental factors, they are reported in the individual chapters of this EIAR, as appropriate.

1.18 Note on Quotations

It is important to acknowledge that statutory EIA requirements call for a comprehensive description of the existing environment as well as all likely significant impacts and effects. The EIA therefore necessarily contains statements describing the positive and negative aspects of the project. Selective quotation, out of context, may not be representative of the overall findings of the EIA and, therefore, any quotations should always be provided in their proper context.

1.19 Relationship to the Planning Application

For the avoidance of doubt, not all elements of the development assessed within this EIA will be subject to a single planning application and this EIA should be read in conjunction with the plans and particulars of the applicable planning application.

