



White Hill Wind Farm

# Natura Impact Statement

White Hill Wind Limited

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## 1. Introduction

Ecology Ireland Wildlife Consultants Ltd. was commissioned by White Hill Wind Limited to prepare a Natura Impact Statement (NIS) for the project of a wind farm known as the White Hill Wind Farm located in Co. Carlow and Co. Kilkenny. The project is for the construction, operation and decommissioning of a 7 no. turbine wind farm and associated ancillary infrastructure together with grid connection infrastructure connecting to the existing Kilkenny 110kV substation located c. 15km to the southwest.

The purpose of this NIS is to determine, in view of best scientific knowledge, applying the precautionary principle, and in light of the conservation objectives of the relevant Natura 2000 sites, whether the project, either alone or in combination with other plans or projects, may adversely affect the integrity of any Natura 2000 sites. Natura 2000 sites, also known as European Sites, are Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

The legal basis on which SACs are selected and designated is the EU Habitats Directive, transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended. SACs are designated for the protection of certain habitats and species under the Habitats Directive. Ireland is required under the terms of the EU Birds Directive (2009/147/EC) to designate SPAs for the protection of endangered species of wild birds. This includes certain listed rare and vulnerable species, regularly occurring migratory species, such as ducks, geese and waders, and wetlands, especially those of international importance, which attract large numbers of migratory birds each year.

This report provides information which can be used to assist the Competent Authority in applying Article 6(3) and 6(4) of the Habitats Directive<sup>1</sup> as necessary, under their roles, functions and responsibilities in relation to the Appropriate Assessment of plans or projects.

The legislative context of the requirement to undertake Appropriate Assessment (AA) and the AA process is outlined in the following sections.

### 1.1. Legislative Context

#### 1.1.1. Requirement for Appropriate Assessment Screening

Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (*The Habitats Directive*) was transposed into Irish law by the European Communities (Natural Habitats) Regulations 1997, which was subsequential consolidated through the European Communities (Birds and Natural Habitats) Regulations 2011 (*The Habitats Regulations*) (as Amended 2013, 2015 & 2021).

An AA Screening provides the information necessary to fulfil the requirements of Article 6 of the EU Habitats Directive 1992 and Regulation 42 of the Habitats Regulations 2011 (as Amended) in determining the potential impacts on Natura 2000 Sites from the proposal. Regulation 42(1) of the of the Habitat Regulations requires that:-

*“A Screening for Appropriate Assessment of a plan or project for which an application for consent is received, or which a public authority wishes to*

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<sup>1</sup> Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, as amended by Council Directive 97/62/EC. Available at: [http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index\\_en.htm](http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm).

*undertake or adopt, and which is not directly connected with or necessary to the management of the Site as a Natura 2000 Site, shall be carried out by the public authority to assess, in view of best scientific knowledge and in view of the conservation objectives of the Site, if that plan or project, individually or in combination with other plans or projects is likely to have a significant effect on the Natura 2000 Site”.*

Case law<sup>2</sup> has required that measures which are *intended to avoid or reduce* the harmful effects of the project on any relevant Natura 2000 site, i.e. specific mitigation, cannot be considered at the screening stage of the AA process and where this arises, the plan or project must be assessed fully.

If, following the screening process, a likely significant effect is predicted or cannot be ruled out; under Regulation 42(6) of the Habitat Regulations, an AA is required in order to determine the potential for impact on the integrity of a Natura 2000 site. In the event of a negative assessment in terms of an adverse effect on Site integrity, a proposal can only be consented in the absence of feasible alternatives and for ‘Imperative Reasons of Overriding Public Interest’ (IROPI). In such cases, compensatory measures to ensure the integrity of the Natura 2000 Site is maintained, are required. The Guidance document on Article 6(4) of the ‘Habitats Directive’ states that:-

*“any uncertainty over the precise nature and/or magnitude of the adverse effects should be thoroughly tested. Where appropriate, a precautionary approach should be adopted and the assessment of adverse effect based on a worse-case scenario.”<sup>3</sup>*

While a screening assessment appraisal or Natura Impact Statement (NIS) may be provided by the advocate of the plan or project in question, the AA itself is undertaken by the competent authority (e.g., the planning authority and An Bord Pleanála). So, in this case, the AA for the project, described herein, is undertaken by An Bord Pleanála; informed by this Screening for AA and NIS and any other relevant information provided to the statutory body.

### 1.1.2. Requirement for a Natura Impact Statement

The AA test assesses whether, in view of the best scientific knowledge and applying the precautionary principle, and in light of the conservation objectives of the relevant Natura 2000 sites, the proposed project, either alone or in combination with other plans or projects, may adversely affect the integrity of any Natura 2000 sites.

If, following the screening process, a potential significant effect is predicted or cannot be ruled out, under Regulation 42(6) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) and part 177U (part XAB) of the Planning and Development Act 2000 (as amended), an AA is required in order to determine the potential for impact on integrity of Natura 2000 sites. The Screening for AA, as detailed in **Section 4** of this report, determined that potential significant effects on Natura 2000 Sites could not be ruled out and therefore a NIS is required.

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<sup>2</sup> People Over Wind and Peter Sweetman v Coillte Teoranta (C-323/17); and, Heather Hill Management Company CLG v An Bord Pleanála [2019] IEHC 450.

<sup>3</sup> European Commission (2007) Available at:

[http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/guidance\\_art6\\_4\\_en.pdf](http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/guidance_art6_4_en.pdf) [Accessed July 2021].

## 1.2. The Appropriate Assessment (AA) Process

The sections, paragraphs and tables of this report relate in sequence to the process of assessing the potential impact of the project in the context of the sequential requirements detailed under Article 6 of the EU Habitats Directive. As outlined in guidance provided by Department of Environment, Heritage and Local Government (DoEHLG, 2010), the four-stage process of Appropriate Assessment has been followed, whereby the outcome at each successive stage determines whether a further stage in the process is required, including:-

- Stage 1: Screening for Appropriate Assessment;
- Stage 2: Appropriate Assessment – provision of Natura Impact Statement (NIS);
- Stage 3: Alternative Solutions; and,
- Stage 4: Imperative Reasons of Overriding Public Interest (IROPI)/Derogation.

### 1.2.1. Stage 1: Screening for AA

This process identifies, without consideration of mitigation measure, whether the project is:-

- i) directly connected to or necessary for the management of a Natura 2000 site(s); and,
- ii) identifies whether the development is likely to have significant effects upon a Natura 2000 site(s) in view of a site's conservation objectives either alone or in combination with other projects or plans.

The outcome from this stage is a determination for each Natura 2000 site(s) of not significant, significant, potentially significant, or uncertain effects. The latter three determinations for a given Natura 2000 site triggers Stage 2 of the AA process.

### 1.2.2. Stage 2: Appropriate Assessment

This stage considers any adverse effects of the project on the integrity of Natura 2000 sites, either alone or in combination with other projects or plans, with respect to a sites:-

- conservation objectives; and,
- its structure and function.

Mitigation measures necessary to avoid, reduce or off negative effects are proposed and assessed at this stage.

The output from this stage is a NIS. This document must include sufficient information for the competent authority to carry out the appropriate assessment. If the assessment is negative, i.e. adverse effects on the integrity of a site cannot be excluded, then the process must consider alternatives (Stage 3) or proceed to Stage 4.

### 1.2.3. Stage 3: Alternative Solutions

This stage examines alternative ways of achieving the objectives of the project that avoid adverse effects on the integrity of a Natura 2000 site. This assessment may be carried out concurrently with Stage 2 in order to find the most appropriate solution. If no alternatives exist or all alternatives would result in adverse effects to the integrity of Natura 2000 site(s), then the process either moves to Stage 4 or the project is abandoned.

#### 1.2.4. Stage 4: Imperative Reasons of Overriding Public Interest (IROPI)/Derogation

This stage includes the identification and assessment of compensatory measures where, in the context of Imperative Reasons of Overriding Public Interest (IROPI), it is deemed that the project or plan should proceed although it has been determined that no less damaging alternative solution exists.

#### 1.3. Main Sources of Information

The following guidance documents and sources of information were consulted:-

- *Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC* (European Commission 2021);
- Department of Environment, Heritage and Local Government (DoEHLG, 2009 as amended in 2010). *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities*;
- OPR, Practice Note PN01. *Appropriate Assessment Screening for Development Management 2021*;
- European Community Habitats Directive (92/43/EEC) – The Habitats Directive;
- European Communities (Natural Habitats) Regulations 1997;
- European Commission Environment DG (2018) *Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC*;
- Environmental Protection Agency (EPA) Maps;
- National Parks and Wildlife Services online MapViewer;
- National Parks and Wildlife Service's data (downloaded GIS datafiles);
- Other planning applications in Co. Carlow and Co. Kilkenny - National Planning Application Database;
- White Hill Wind Farm Environmental Impact Assessment Report, including:-
  - Chapter 3 - Description of the Project;
  - Chapter 5 – Biodiversity (see **Annex 2**);
  - Chapter 7 – Water;
  - Planning Stage Construction & Environmental Management Plan (see **Annex 3**); and,
  - Surface Water Management Plan (see **Annex 3**).

More specific sources of information on species/habitat distribution used to inform the desk-based study are provided in **Section 3.1**.

The project was informed by a comprehensive suite of ecological surveys conducted by Ecology Ireland Wildlife Consultants Ltd. between 2019 and 2022. These surveys applied best practice guidelines, as required for ecological assessment for onshore wind farm developments. Of relevance to this NIS are the following surveys, which determined the distribution and occurrence of any Qualifying Interests for Natura 2000 sites within the potential Zone of Influence of the project and identified any source-receptor pathways:-

- Habitat mapping of the project site, as per Fossitt (2000) by experienced surveyors able to identify Annex I habitat types requiring further surveying;
- Non-native/alien invasive species surveys;
- Aquatic ecological surveys, including electrofishing surveys, biological water quality analysis and Freshwater Pearl Mussel surveys;
- Breeding and winter season transects and point count surveys of bird species;
- Multi-year vantage point (VP) surveys to record bird usage of the study area;

- Protected non-mammal surveys covering waterbodies within and draining the project site; and,
- Surveys of other protected taxa.

The surveys included coverage of the wind farm study area (i.e wider area around the wind farm site; see **Figure 1b**), haul route works locations and along the grid connection route. A description of the project is provided at **Section 2.1** below. Summary details of the desktop and field surveys undertaken are provided at **Annex 2**.

#### 1.4. Stage 1 Assessment Criteria

Assessment criteria used in the evaluation of likely significant effects on designated Natura 2000 sites included (with reference to European Commission, 2001 & 2021):-:

- Size, scale, area, land-take of the planned development;
- Physical changes that will occur as a result of the proposed plan or project;
- Resource requirements (water abstraction etc.);
- Construction and operational requirements;
- Emissions and waste (disposal to land, water or air);
- Transportation requirements;
- Duration of construction and operation;
- Disturbance and displacement of key species; and,
- Cumulative impacts with other projects or plans.

The Stage 1 assessment criteria were used in conjunction with consideration of the likely changes to the Natura 2000 sites, including:-

- Loss of habitat;
- Habitat or species fragmentation;
- Disturbance to key species;
- Reduction in species density;
- Changes in key indicators of conservation value (water quality etc.); and,
- Change to key elements of the site.

#### 1.5. Statement of Authority

The principal authors of this NIS report are Dr. Gavin Fennessy and Athena Michaelides. Dr. Fennessy is the Principal Ecologist at Ecology Ireland and has almost 25-years' experience in professional consultancy. He is expert in survey design and ecological assessment and has presented papers at international conferences on bird strike (collision risk).

Athena Michaelides (BSc Zoology & Animal Biology) has over 5-years' experience as a professional ecological consultant. She is a former secretary of the Irish Wildlife Trust with particular experience in field surveys and reporting.

## 2. Description of the Project and Receiving Environment

### 2.1. Description of the Project & Site

The project comprises the following main components:-

- 7 no. wind turbines with an overall tip height of 185m, and all associated ancillary infrastructure;
- All associated and ancillary site development, excavation, construction, landscaping and reinstatement works, including the provision of site drainage infrastructure;

- Upgrades to the turbine component haul route; and
- Construction of an electricity substation and installation of c. 15km of underground grid connection cable between the White Hill Wind Farm and the existing Kilkenny 110kV electricity substation.

Off-site and secondary elements of the project include:-

- The construction of a temporary access track (150m in length) at the junction between the N78 and L1834;
- Carriageway strengthening works at 'Black Bridge' on the L1835 and L3037;
- 15km of underground electricity lines to facilitate connection of the wind farm electricity substation to the existing Kilkenny 110kV substation; and,
- The planting of 15ha of commercial (replacement) forestry on lands in the townland of Drumagelvin, Co. Monaghan.

A 10-year planning permission is being sought by the Developer for this project. That is, planning permission would remain valid for 10-years following the final grant. The operational lifespan of the project is proposed to be 35-years following the full commissioning of the wind farm.

The wind farm is located in in west County Carlow and east County Kilkenny; c. 13 kilometres (km) southwest of Carlow, c. 14km northeast of Kilkenny City and c. 4km west of Oldleighlin. The location of the wind farm, in a regional context, is illustrated at **Figure 1a** below. The wind farm, which will have an overall site area of approximately 290 hectares, will be located in the townlands of Ridge (Ridge E.D.), Knocknabranagh and Knockbaun, and Baunreagh, Co. Carlow; and Coolcullen, Co. Kilkenny. Accordingly, the wind farm site traverses the administrative boundary between counties Carlow and Kilkenny. 4 no. turbines are located in Co. Carlow and 3 no. turbines within Co. Kilkenny. The electricity substation is located within Co. Carlow while the majority, c. 14km, of the underground electricity line is located in Co. Kilkenny

The wind farm site is located on an elevated plateau, known as the Castlecomer Plateau, which is located in south County Laois, northwest County Carlow and northeast County Kilkenny. The Castlecomer Plateau is characterised by undulating hills and steep escarpments at its fringes. Dissecting the lowlands on either side of the plateau are the Barrow and Nore rivers, which lie to the east and west respectively. The lowlands are a mixture of pasture and tillage with fields typically bordered by mature broadleaf tree lines and hedgerows. Agricultural land uses extend into the upland areas in the form of more marginal grazing with scrubby hedgerow field boundaries. Extensive commercial conifer plantations emerge on higher slopes throughout the Castlecomer Plateau.

The wind farm site is located within the South Eastern River Basin District and, specifically, within the Nore and Barrow river catchments. No major watercourses are present within the site. However, a number of drainage ditches and lower order watercourses/streams flow through the wind farm, such as the Coolcullen River and Knocknabranagh and Knockbaun stream. The streams that drain the wind farm run in a northerly direction and join together before flowing into the River Dinin (South) which is itself a tributary of the River Nore and forms part of the River Barrow and Nore SAC (002162). The Dinin (South)\_020 flows into the River Barrow and River Nore SAC, downstream of Black Bridge. The Dinin (South)\_020 is considered "Not at Risk" under the Water Framework Directive (WFD Risk Status) and has been assigned a "Good" WFD Status 2013-2018.

The River Barrow and River Nore SAC is therefore hydrologically connected to the project site and is located c. 1.7km away from the closest proposed turbine location.

The wind farm site is dominated by agricultural land use, which is intensively managed and subject to ongoing fertilisation. The development footprint will be primarily located on Conifer Plantation (WD4) or Improved Agricultural Grassland (GA1) set out in large open fields, with smaller areas of Spoil and Bare Ground (ED2) also present, in the form of a network of farm access tracks. The development footprint also contains small areas of higher value semi-natural grassland classified as Wet Grassland (GS4).

Short sections of Hedgerow (WL1), Treeline (WL2) will be removed to facilitate the construction of the wind farm. For instance, there may be localised loss of hedgerow and trees to facilitate the stream crossings by wind farm access tracks. However, the extent of vegetation removal has, by design, been minimised and no vegetation will be unnecessarily removed. As part of the reinstatement process; all trees felled and hedgerow removed in the construction of wind farm infrastructure will be replaced elsewhere within the project site, particularly along arterial access tracks.

The grid connection route (see **Figure 2**) runs in a southerly direction for approximately 15km between the electricity substation to the existing 110kV substation at Scart, Co. Kilkenny. The grid connection comprises underground cable to be located predominately within the carriageway of the public road network, with short sections at the respective substations being located within private lands. The watercourses crossed by the grid connection (including the Lyrath and Kilderry\_15 Streams) are all within the River Nore catchment.

It is envisaged that the turbines will be transported from the Port of Waterford, through the counties of Kilkenny, Waterford, Carlow and Kildare to the project site. Temporary accommodation works will be undertaken at a number of locations to facilitate the delivery of components while at 1 no. location, Black Bridge along the L1835 and L3037, permanent bridge strengthening works will be undertaken. The works at Black Bridge will be undertaken immediately upstream of the River Barrow & River Nore SAC.

The replant lands are not located within or adjacent to any designated Natura 2000 site and is dominated by Improved Agricultural Grassland (GA1) with no significant watercourses present. In addition to the assessment undertaken herein, the replanting process will be subject to a separate assessment as part of the forestry felling and replanting consent process and will be undertaken under licence by the Department of Agriculture, Forestry and the Marine.

The project has been designed to implement a Sustainable Drainage System (SuDS) which seeks to:-

- Minimise any change to the surface water and groundwater conditions within the site;
- Avoid sensitive areas where possible by employing hydrological constraints (i.e. buffer zones);
- Replicate the natural drainage of the site;
- Minimise sediment loads in the runoff, with particular attention being given to the construction phase of the project;
- Maintain runoff rates and volumes at Greenfield rates for a range of storm events (to be incorporated into final detailed design); and,
- Avoid high flow velocities internally within new drain networks and at outfall locations to prevent erosion.

The purpose of a SuDS is:-

- To provide sufficient detail to ensure that water pollution will not occur as a result of construction and operational activities at the site and to minimise the risk of any such occurrence;
- To regulate the rate of surface water run-off downslope to prevent scouring and to encourage settlement of sediment locally; and
- To minimise the quantity of sediment laden stormwater and resulting settlement pond sizes by separating 'clean' water from the 'dirty' development runoff.

Swales will be utilised to attenuate water and to direct 'dirty' water to silt/settlement ponds, where the flow velocity will reduce to allow sediment and silt to be deposited. In addition to the silt/settlement ponds, a tertiary treatment system will also be provided to absorb any fine particles that may not settle in the primary and secondary settlement ponds. From the silt/settlement ponds, water will flow through lagoon-type sediment ponds which will be designed with a retention time of 10-days. These ponds will be vegetated so as to perform the role of a "plant filtration bed".

All aspects and phases of the project, from construction through to decommissioning, are considered as part of the assessment.

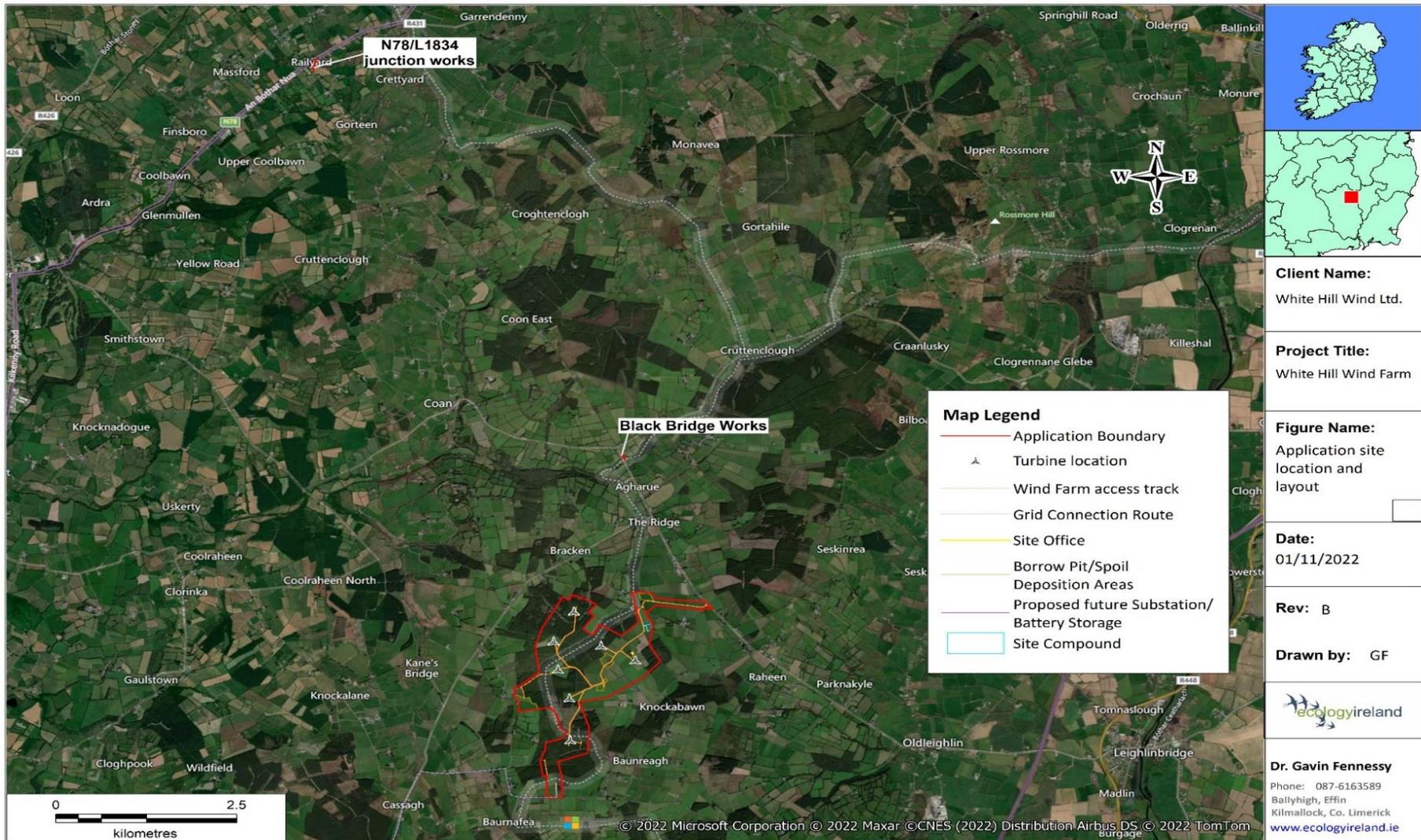


Figure 1a: Location of Wind Farm Site

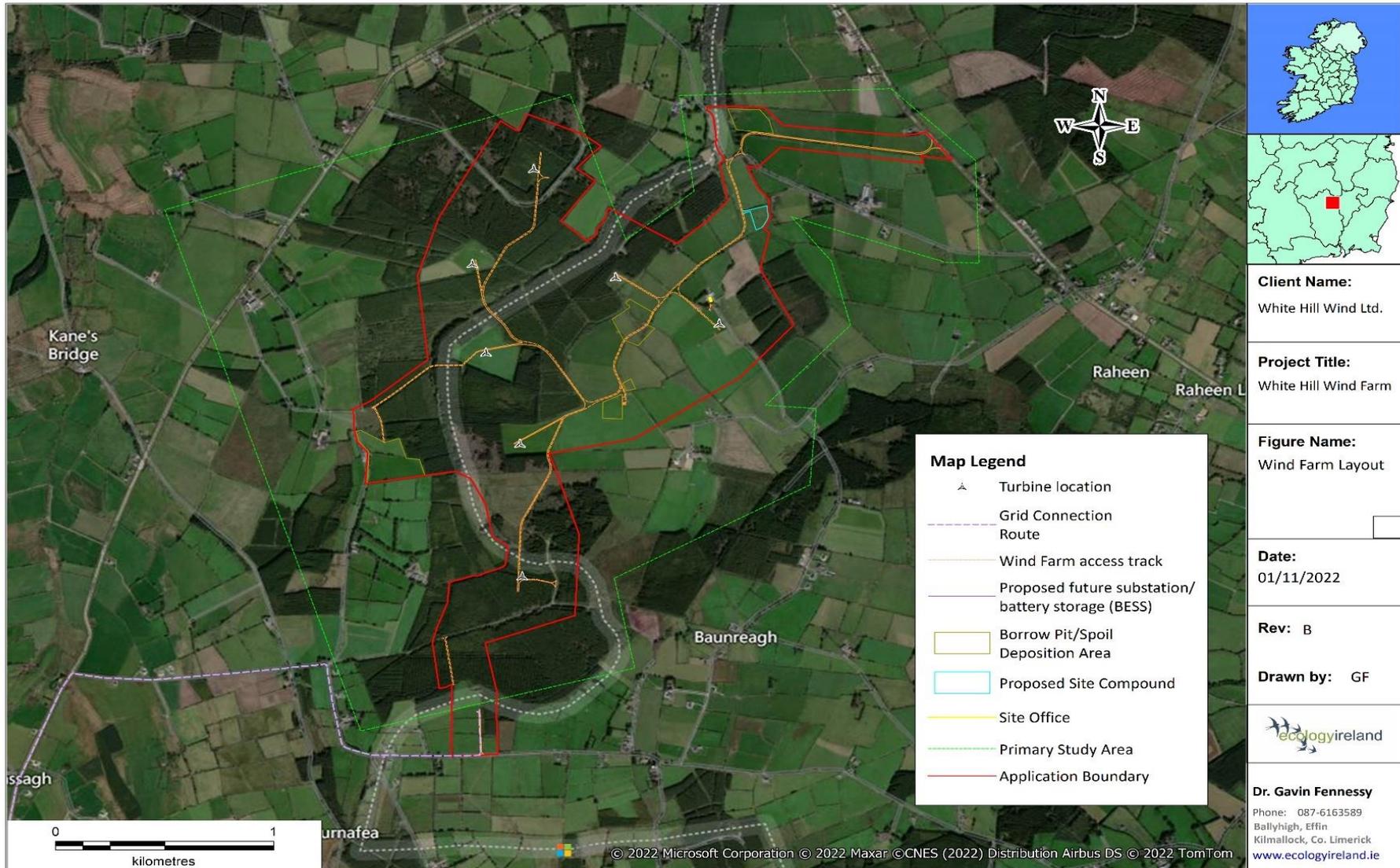


Figure 1b: Proposed Wind Farm Site Layout



Figure 2: Location of Wind Farm Site & Grid Connection Route

### 3. Field Surveys and Assessment Methodology

#### 3.1. Desk Based Study

A desk-based study was carried out to collate the available ecological information on the ecological environment of the project site and to obtain available data on the Natura 2000 sites within the Zone of Influence. The following key sources of information were consulted:-

- The National Parks and Wildlife Service (NPWS) website [www.npws.ie](http://www.npws.ie) was consulted (21.11.2022) with regard to the most up to date detail on conservation objectives for the Natura 2000 sites relevant to this assessment;
- The National Biodiversity Data Base Centre website [www.nbdc.ie](http://www.nbdc.ie) was consulted (21.11.2022) with regard to species distributions; and,
- Aerial imagery was consulted in order to get a broad overview of the habitats present in the vicinity of the site.

The study site lies within the 10km grid square S66 of the National Biodiversity Database Centre and 2km grid squares which overlap the wind farm and grid connection route; S66C, S66I, S66D, S66U, S66W, S66X, S55R, S56T, S56U. Species and habitat records from the vicinity of the project were collated and reviewed as part of the assessment.

#### 3.2. Field Based Studies

Biodiversity field surveys were undertaken at the project site from 2019 to 2022 inclusive. Objectives of the field assessments were to gain an overview of the site, as well as to note ecological points of interest such as the presence of invasive plant species and species that are protected or are part of the qualifying interests of the Natura 2000 sites relevant to this assessment.

Surveys undertaken included general ecological walkovers, habitat and flora assessment which also included invasive species surveys.

No Annex I habitats listed under the EU Habitats Directive are present within the project site, including haul route works locations, replant lands or along the grid connection route. No botanical species protected under the Flora (Protection) Order 2022, listed in Annex II or IV of the EU Habitats Directive (92/43/EEC), or Red listed in Ireland were recorded. All species recorded are considered common for similar habitats in the general area. No species listed on the Third Schedule of the 2011 European Communities (Birds and Natural Habitats) Regulations (i.e., species of which it is an offense to disperse, spread or otherwise cause to grow in any place) were found within the project site. 2 no. non-native invasive plant species, Sycamore *Acer pseudoplatanus* and *Montbretia* were recorded within the wind farm study area. Both of these species are classified as being of medium and low invasive species.

Avian field surveys at the site comprised of the following: multi-season vantage point surveys (VPs), breeding and winter season transect and point count surveys, surveys along the grid connection route. 6 no. VPs were used to observe and record flightlines of bird species in and in the vicinity of the wind farm site. Locations of these surveys can be seen below in **Figure 3** and **Figure 4**.

During the surveys, the potential presence of species such as breeding Red Grouse, *Lagopus lagopus hibernicus*, or breeding waders such as Lapwing, *Vanellus vanellus* was ruled out based on lack of suitable habitats. No recorded wintering roosts of Hen Harrier were found in the area. The project site is also relatively distant from the River

Nore SPA (c. 13km overland and c. 26km upstream) which is designated for Kingfisher, *Alcedo atthis*. On inspection, no suitable breeding habitat for Kingfisher was found on any of the watercourses draining the wind farm site.

Detailed aquatic ecology surveys carried out including electrofishing, biological water quality analysis and Freshwater Pearl Mussel surveys.

Non-volant mammal surveys were also carried out with dedicated walkovers and deployment of trail cameras supplemented with casual observations during other field surveys.

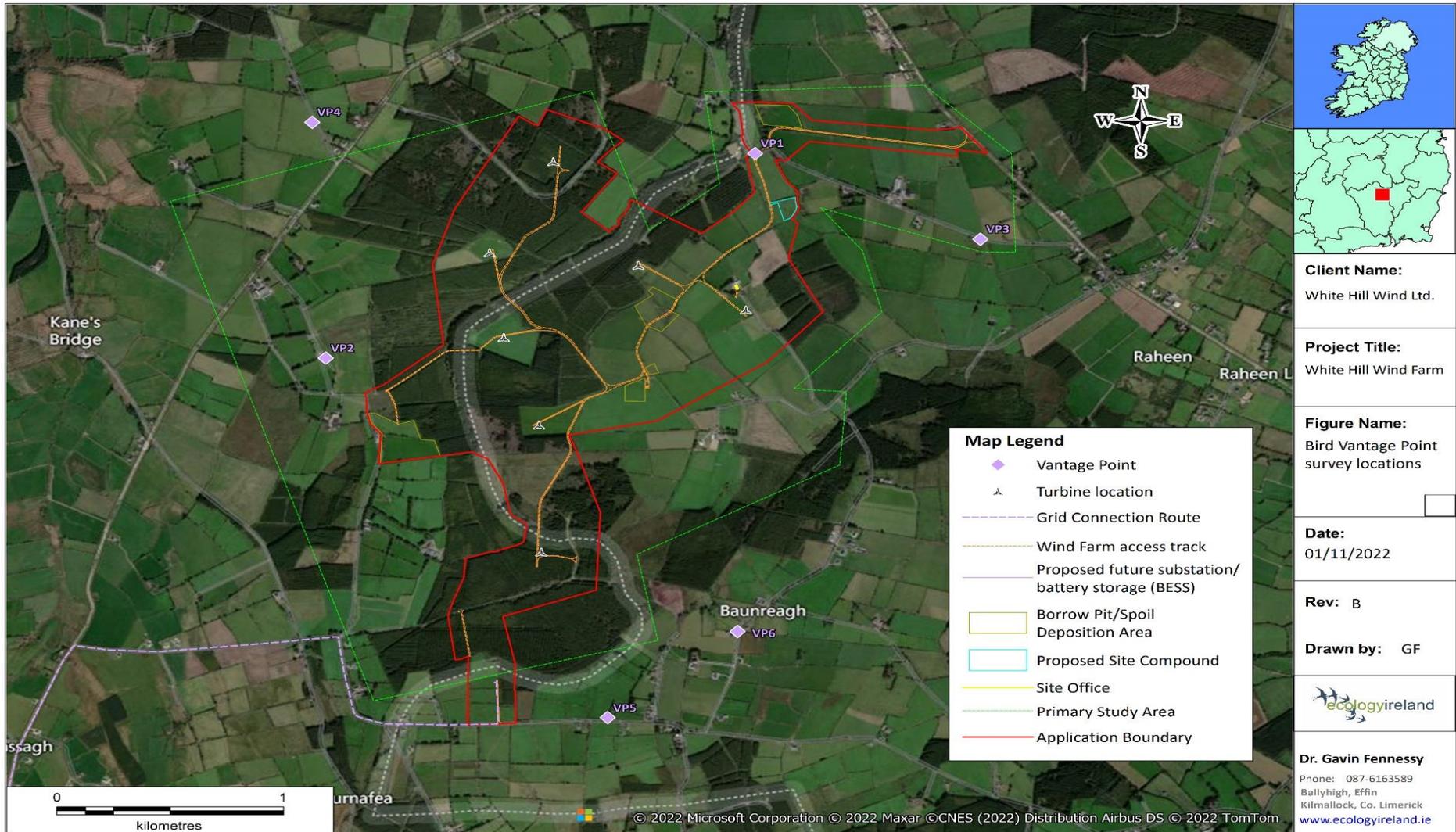


Figure 3: Location of Bird Survey Vantage Points (VPs)



Figure 4: Bird survey Transects and Point Count Locations

### 3.3. Description of the Natura 2000 Sites

In assessing the sites that could potentially be impacted by the project, a source-pathway-receptor model was used. All sites potentially impacted were considered in relation to the size and nature of the development and the sensitivity of the receptors in the wider locality. Where a Natura 2000 site of particular significance/relevance exists beyond a nominal screening area, this was also included in the screening appraisal. Accordingly, all potential pathways for impact on designated sites have been included in this screening exercise both within and outside a nominal 15km zone (Zone of Influence) which was chosen to display the location and discuss sites most proximate to the project. This is an arbitrary distance typically used for illustrative purposes (e.g., DoEHLG 2010). **Figure 5** shows the Natura 2000 sites located within 15km of the development site. The grid connection route can also be seen below in **Figure 5**.

A total of 3 no. Natura 2000 sites are located within 15km of the project site. **Table 1** shows the minimum distance between the project site and European designated conservation sites. The minimum distance from the closest of the proposed wind turbines is also provided below.

The likelihood of effects upon more distant designated sites is also considered in the event that any likely significant effects are identified in relation to these distant sites during the assessment process.

The carriageway strengthening at Black Bridge on the L1835/L3037 is just upstream of the River Barrow and River Nore SAC (002162). The closest turbine location to this designated site is c. 1.7km distant. There are 2 no. further Natura 2000 sites located within the 15km hinterland of the project. The River Nore SPA (004233) is situated 11.5km and Lisbigney Bog SAC (000869) is located 12.4km from the project.

The qualifying interests and conservation objectives of the Natura 2000 sites under consideration are summarised in more detail in **Table 1** and **Table 2** below.

Site Name	Site Code	Minimum Distance from Project Site (km)	Minimum Distance from nearest Turbine (km)
Natura 2000 Sites			
River Barrow & River Nore SAC	002162	0.0	1.7
River Nore SPA	004233	11.5	13.0
Lisbigney Bog SAC	000869	12.4	19.6

**Table 1: Minimum distances to Natura 2000 sites in receiving environment**

Site Name & Code	Qualifying/Special Conservation Interests	Location from the Project Site
River Barrow & River Nore SAC (002162)	<ul style="list-style-type: none"> <li>• Estuaries [1130];</li> <li>• Mudflats and sandflats not covered by seawater at low tide [1140];</li> <li>• Reefs [1170];</li> <li>• Salicornia and other annuals colonising mud and sand [1310];</li> <li>• Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330];</li> <li>• Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410];</li> <li>• Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation [3260];</li> <li>• European dry heaths [4030];</li> <li>• Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430];</li> <li>• Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220];</li> <li>• Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0];</li> <li>• Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) [91E0];</li> <li>• <i>Vertigo moulinsiana</i> (Desmoulin's Whorl Snail) [1016];</li> <li>• <i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029];</li> <li>• <i>Austropotamobius pallipes</i> (White-clawed Crayfish) [1092];</li> <li>• <i>Petromyzon marinus</i> (Sea Lamprey) [1095];</li> <li>• <i>Lampetra planeri</i> (Brook Lamprey) [1096];</li> <li>• <i>Lampetra fluviatilis</i> (River Lamprey) [1099];</li> <li>• <i>Alosa fallax fallax</i> (Twaite Shad) [1103];</li> <li>• <i>Salmo salar</i> (Salmon) [1106];</li> <li>• <i>Lutra lutra</i> (Otter) [1355];</li> <li>• <i>Trichomanes speciosum</i> (Killarney Fern) [1421]; and,</li> <li>• <i>Margaritifera durrovensis</i> (Nore Pearl Mussel) [1990]</li> </ul>	Immediately downstream of Black Bridge and c. 1.7km overland from nearest turbine location.
River Nore SPA (004233)	<ul style="list-style-type: none"> <li>• Kingfisher (<i>Alcedo atthis</i>) [A229]</li> </ul>	c. 11.5km over land and in excess of 20km via watercourses
Lisbigney Bog SAC (000869)	<ul style="list-style-type: none"> <li>• Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> [7210]; and,</li> <li>• <i>Vertigo moulinsiana</i> (Desmoulin's Whorl Snail) [1016]</li> </ul>	12.4km overland. No hydrological link, located upstream of project site.

**Table 2: Summary of Designated Natura 2000 Sites located within 15km**

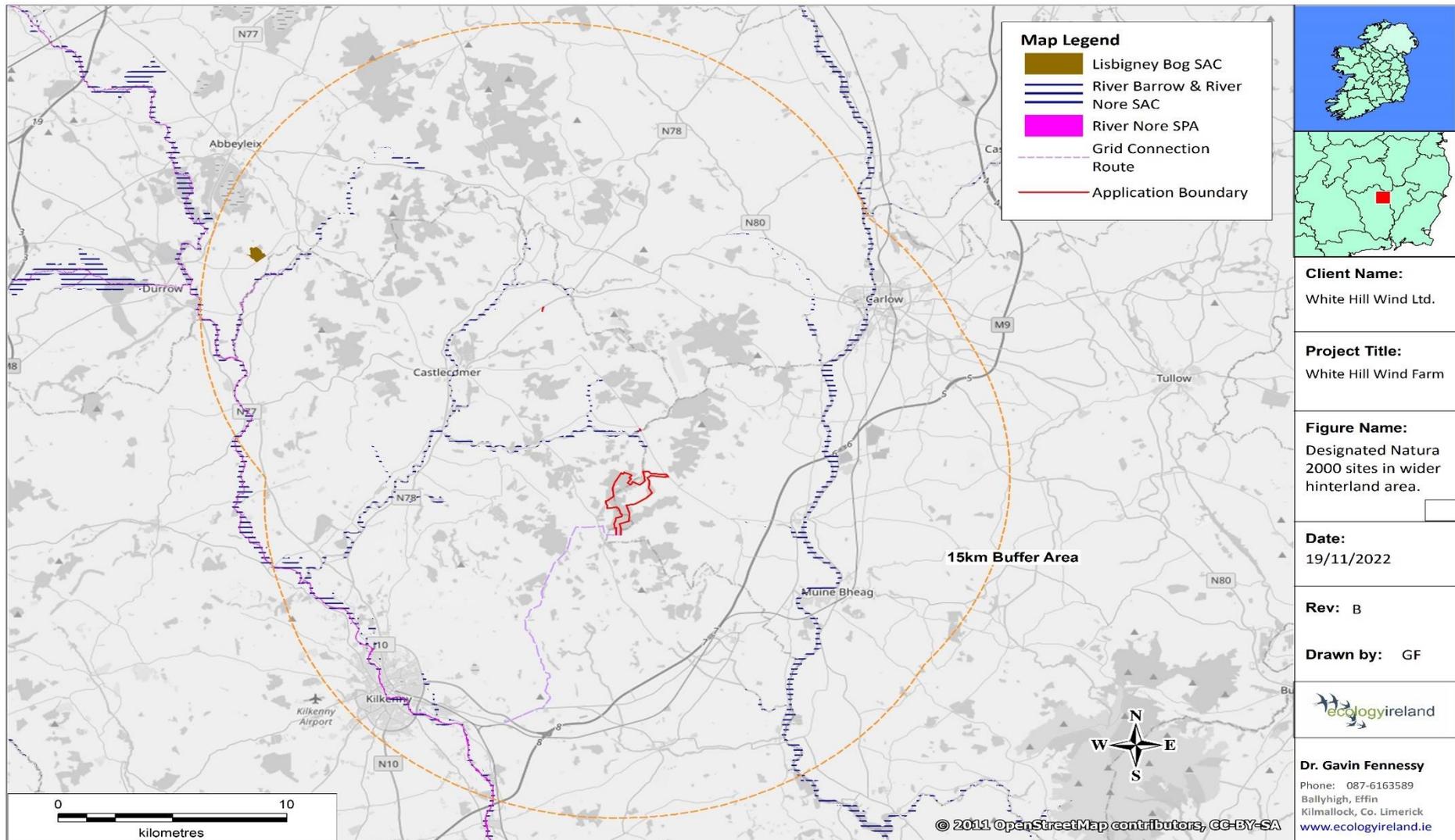


Figure 5: Map of Natura 2000 Sites within 15km of the Project

#### 4. Stage 1: Screening

With the exception of the minor enabling works on the haul route at Black Bridge, the wind farm development is not situated within or immediately adjacent to any Natura 2000 site and, consequently, the potential for direct impacts on any Natura 2000 sites as a result of the project can be excluded.

The Natura 2000 sites assessed in this screening statement in relation to the project are as follows:-

- River Barrow and River Nore SAC (002162);
- River Nore SPA (004233); and,
- Lisbigney Bog SAC (000869).

The closest Natura 2000 sites to the development site is the River Barrow and River Nore SAC which is immediately adjacent to the works at Black Bridge along the L1835 and L3037 and located c. 1.7km from the nearest wind turbine. This SAC is designated for a wide range of habitats and species as summarised in **Table 2**.

There are hydrological links between the project site and the SAC. Watercourses flowing through the project site; the Knocknabranagh and Knockbaun stream and Coolcullen Stream which flows into the Coolcullen River. The Coolcullen River runs in a northerly direction and joins the River Dinin which is itself a tributary of the River Nore and forms part of the River Barrow and Nore SAC (002162). The Dinin (South)\_020 flows downstream of Black Bridge forms part of the River Barrow and River Nore SAC. There is a potential impact-receptor pathway via a hydrological link between the project site and the River Barrow and River Nore SAC.

In the absence of appropriate mitigation, significant effects could occur in relation to the River Barrow & River Nore SAC. While a number of these qualifying interests are located either upstream of the site, or in areas so distantly downstream (e.g., Estuaries, Saltmarsh habitats) that there is no likelihood of impact, there are other QIs that could potentially be impacted. Apart from the works to facilitate turbine delivery on Black Bridge, the construction works will not be carried out in close proximity to the SAC (the nearest turbine is located c. 1.7km overland). No signs of resting or breeding places for Otter were recorded at the wind farm site or at any of the watercourse crossings along the grid connection route or at Black Bridge. Given the limited nature of the works on Black Bridge it is unlikely that there will be any significant disturbance or displacement effects on faunal QIs. The likely significant effects identified are those associated with run-off/contamination of watercourses linked to the SAC.

The River Nore SPA has been designated for the protection of Kingfisher, *Alcedo atthis*. It is located c. 11.5km over-land from the project site and located c. 26km downstream of the project site. Kingfishers hold linear territories along the riparian corridor of from <1km to several kilometres in length (BWPI). Surveys on Irish river systems indicate they favour rivers with availability of vertical nesting banks of 1-2m in height (Cummins *et al.* 2010). The small streams that drain the wind farm site are unattractive for nesting Kingfishers and would represent sub-optimal foraging habitat for this largely sedentary species. Given the distances involved between the project site and the SPA, there is no potential for any direct impacts on Kingfisher. However, given that there is a hydrological link, albeit distant, there is some potential, in the absence of adequate mitigation, for impact upon the habitat and prey abundance within the SPA.

Lisbigney Bog SAC is located upstream and at 12.4km over-land from the project site. It is designated for calcareous fen habitat and for the protection of Desmoulin's Whorl Snail. There is no credible pathway for any significant effects to occur at this SAC in relation to any phase of the project. Therefore, there is no likelihood of direct or indirect impacts on this site arising from the project. As a result, Lisbigney Bog SAC is not considered in any further detail in the screening assessment.

**Table 3** and **Table 4** present a summary of the assessment of the QIs/SCIs of the hydrologically connected Natura 2000 sites and their potential for likely significant effects based on the location, scale and nature of the project. Based on the distribution of certain habitat features (for instance), there is no likelihood that they would be significantly affected by the project.

River Barrow and River Nore SAC (002162)			
Qualifying Interest Species	Potential Presence within Zone of Influence	Potential for Likely Significant Effects	Screening Outcome
Estuaries [1130]	The closest example of this habitat is located nearly 100km downstream from the project and therefore there is no likelihood of impact upon this QI.	Given the distance from this habitat and the dilution effect at this remove, there is no likelihood of significant effects on this habitat.	Screened out.
Mudflats and sandflats not covered by seawater at low tide [1140]	The closest example of this habitat is located over 80km downstream from the project and, therefore, there is no likelihood of impact upon this QI.	Given the distance from this habitat and the dilution effect at this remove, there is no likelihood of significant effects on this habitat.	Screened out.
Reefs [1170]	The closest example of this habitat is located over 100km downstream from the project and, therefore, there is no likelihood of impact upon this QI.	Given the distance from this habitat and the dilution effect at this remove, there is no likelihood of significant effects on this habitat.	Screened out.
Salicornia and other annuals colonising mud and sand [1310]	The closest example of this habitat is located over 100km downstream of the project and, therefore, there is no likelihood of impact upon this QI.	Given the distance from this habitat and the dilution effect at this remove, there is no likelihood of significant effects on this habitat.	Screened out
Atlantic salt meadows ( <i>Glaucopuccinellietalia maritima</i> ) [1330]	The closest example of this habitat is located c. 100km downstream of the project and, therefore, there is no likelihood of impact upon this QI.	Given the distance from this habitat and the dilution effect at this remove, there is no likelihood of significant effects on this habitat.	Screened out
Mediterranean salt meadows	The closest example of this habitat is located c. 100km downstream of the	Given the distance from this habitat and the dilution effect at	Screened out

River Barrow and River Nore SAC (002162)			
Qualifying Interest Species	Potential Presence within Zone of Influence	Potential for Likely Significant Effects	Screening Outcome
<i>Juncetalia maritimi</i> [1410]	project and, therefore, there is no likelihood of impact upon this QI.	this remove there is no likelihood of significant effects on this habitat.	
Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation [3260]	<p>The full distribution of this habitat and its sub-types in this site is currently unknown (NPWS July 2011).</p> <p>The basis of the selection of the SAC for the habitat is the presence of an excellent example of the vegetation community (nutrient-rich type) associated with extensive tufa deposits on the riverbed in the Kings tributary of the Nore (Heuff, 1987). Other examples of this or other sub-types may be present within the SAC. River connectivity with the floodplain is essential for the functioning of this habitat. The site of the tufaceous sub-type in the King's River is within an area of floodplain, with further large floodplains upstream. Floodplains regulate fine sediment deposition within the channel.</p> <p>Given that the works at the project do not occur within the flood plain or any flood zones, significant impacts on this habitat have been ruled out.</p>	No potential source-pathway-receptor links to this habitat, therefore no potential impact.	Screened out
European dry heaths [4030]	The spatial extent of this habitat is currently unmapped but indicated as occurring on the steep, free- draining, river valley sides especially the Barrow and tributaries in the	No potential source-pathway-receptor links to this habitat, therefore no potential impact.	Screened out

River Barrow and River Nore SAC (002162)			
Qualifying Interest Species	Potential Presence within Zone of Influence	Potential for Likely Significant Effects	Screening Outcome
	<p>foothills of the Blackstairs Mountains. Dry heath in this SAC occurs on free- draining nutrient poor soils and is often characterised by gorse and open acid grassland areas.</p> <p>The area within and surrounding the project site is unsuitable for this habitat type as it lies in any area with agricultural fields.</p>		
Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430]	<p>Distribution of this habitat in this site is currently unknown (NPWS July 2011). It is considered to occur in association with some riverside woodlands, unmanaged river islands and in narrow bands along the floodplain of slow-flowing stretches of river.</p> <p>The area surrounding the project site is unsuitable for this habitat type as it lies in any area with agricultural fields.</p>	No potential source-pathway-receptor links to this habitat, therefore no potential impact.	Screened out
Petrifying springs with tufa formation ( <i>Cratoneurion</i> ) [7220]	The closest example of this habitat is located c. 50km downstream from the project and, therefore, there is no likelihood of impact upon this QI.	Given the distance from this habitat and the dilution effect at this remove, there is no likelihood of significant effects on this habitat.	Screened out
Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0], Alluvial	The closest example of this habitat is located well over 50km downstream of the project and, therefore, there is no likelihood of impact upon this QI.	Given the distance from this habitat and the dilution effect at this remove, there is no likelihood of significant effects on this habitat.	Screened out

River Barrow and River Nore SAC (002162)			
Qualifying Interest Species	Potential Presence within Zone of Influence	Potential for Likely Significant Effects	Screening Outcome
forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> ( <i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i> ) [91E0]			
Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> ( <i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i> ) [91E0]	The closest example of this habitat is located over 30km away from the project and, therefore, there is no likelihood of impact upon this QI.	Given the distance from this habitat and the dilution effect at this remove, there is no likelihood of significant effects on this habitat.	Screened out
<i>Vertigo moulinsiana</i> (Desmoulin's Whorl Snail) [1016]	This species has not been recorded in areas downstream of the development.	No potential source-pathway-receptor links to this habitat, therefore no potential impact.	Screened out
<i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029]	The status of the freshwater pearl mussel ( <i>Margaritifera margaritifera</i> ) as a qualifying Annex II species for the River Barrow and River Nore SAC is currently under review. The project site lies within a Freshwater Pearl Mussel catchment: Nore Lower. Given that there are watercourses on site which, in turn, have a hydrological link to the SAC, there is potential for significant effects on this species due to the project.	Pollution/release of suspended solids and/or other pollutants.	Due to the Freshwater Pearl Mussel being sensitive to water quality changes and that the project occurs within a FWPM catchment, site specific mitigation is required to ensure that the River Barrow and River Nore SAC and associated water bodies are not impacted by any pollution which may occur as a result of the project. <b>Construction Phase:</b>

River Barrow and River Nore SAC (002162)			
Qualifying Interest Species	Potential Presence within Zone of Influence	Potential for Likely Significant Effects	Screening Outcome
			<p>Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased siltation, nutrient release and/or contamination.</p> <p><b>Operational Phase:</b> Potential run-off and/or discharge from site works into the receiving aquatic environment on site increased siltation, nutrient release and/or contamination.</p> <p><b>Decommissioning Phase:</b> Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased siltation, nutrient release and/or contamination.</p>
<p><i>Austropotamobius pallipes</i> (White-clawed Crayfish) [1092],</p>	<p>Crayfish are present throughout this SAC. No major watercourses are present within the site. However, a number of drainage ditches and lower order watercourses/streams flow through the project site, such as the Coolcullen River, Coolcullen Stream and the Knocknabranagh and Knockbaun Stream. Given the nature of the works near water, there is potential for significant effects on this species, in the absence of suitable mitigation and environmental monitoring.</p>	<p>Pollution/release of suspended solids and/or other pollutants.</p>	<p>Due to the White-clawed Crayfish being sensitive to water quality changes, site specific mitigation is required to ensure that the surrounding watercourses and associated water bodies are not impacted by any pollution which may occur from the project.</p> <p><b>Construction Phase:</b> Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased</p>

River Barrow and River Nore SAC (002162)			
Qualifying Interest Species	Potential Presence within Zone of Influence	Potential for Likely Significant Effects	Screening Outcome
			<p>siltation, nutrient release and/or contamination.</p> <p><b>Operational Phase:</b> Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased siltation, nutrient release and/or contamination.</p> <p><b>Decommissioning Phase:</b> Potential run-off and/or discharge from site works into the receiving aquatic environment on site increased siltation, nutrient release and/or contamination.</p>
<p><i>Petromyzon marinus</i> (Sea Lamprey) [1095]</p>	<p>Artificial barriers can block or cause difficulties to lampreys' upstream migration, thereby limiting species to lower stretches and restricting access to spawning areas.</p> <p>Given that there are watercourses present on site (i.e. Coolcullen River, Coolcullen Stream and the Knocknabranagh and Knockbaun Stream) which flow into the Dinin River, itself a tributary of the River Nore, a hydrological link is present and without appropriate mitigation there is a likelihood of significant effects on this species due to the project.</p>	<p>Pollution/release of suspended solids and/or other pollutants.</p>	<p>Due to Sea Lamprey being sensitive to water quality changes, site specific mitigation is required to ensure that the surrounding watercourses and associated water bodies are not impacted by any pollution which may occur from the proposed works.</p> <p><b>Construction Phase:</b> Potential run-off and/or discharge from site works into the receiving aquatic environment on site increased siltation, nutrient release and/or contamination.</p> <p><b>Operational Phase:</b> Potential run-off and/or discharge from site works into the receiving aquatic</p>

River Barrow and River Nore SAC (002162)			
Qualifying Interest Species	Potential Presence within Zone of Influence	Potential for Likely Significant Effects	Screening Outcome
			<p>environment on site through increased siltation, nutrient release and/or contamination.</p> <p><b>Decommissioning Phase:</b></p> <p>Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased siltation, nutrient release and/or contamination.</p>
<p><i>Lampetra planeri</i> (Brook Lamprey) [1096]</p>	<p>Artificial barriers can block or cause difficulties to lampreys' upstream migration, thereby limiting species to lower stretches and restricting access to spawning areas.</p> <p>Given that there are watercourses present on site (i.e. Coolcullen River, Coolcullen Stream and the Knocknabranagh and Knockbaun stream) which runs into the Dinin which is a tributary of the River Nore), a hydrological link is present and there is potential for significant effects on this species due to the project.</p>	<p>Pollution/release of suspended solids.</p>	<p>Due to Brook Lamprey being sensitive to water quality changes, site specific mitigation is required to ensure that the surrounding watercourses and associated water bodies are not impacted by any pollution which may occur from the proposed works.</p> <p><b>Construction Phase:</b></p> <p>Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased siltation, nutrient release and/or contamination.</p> <p><b>Operational Phase:</b></p> <p>Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased siltation, nutrient release and/or contamination.</p>

River Barrow and River Nore SAC (002162)			
Qualifying Interest Species	Potential Presence within Zone of Influence	Potential for Likely Significant Effects	Screening Outcome
			<p><b>Decommissioning Phase:</b></p> <p>Potential run-off and/or discharge from site works into the receiving aquatic environment on site increased siltation, nutrient release and/or contamination.</p>
<p><i>Lampetra fluviatilis</i> (River Lamprey) [1099]</p>	<p>Artificial barriers can block or cause difficulties to lampreys' upstream migration, thereby limiting species to lower stretches and restricting access to spawning areas.</p> <p>Given that there are watercourses present on site (i.e. Coolcullen River, Coolcullen Stream and the Knocknabranagh and Knockbaun stream) which runs into the Dinin which is a tributary of the River Nore), a hydrological link is present and there is potential for significant effects on this species due to the project.</p>	<p>Pollution/release of suspended solids.</p>	<p>Due to River Lamprey being sensitive to water quality and any changes, site specific mitigation is required ensure that the surrounding watercourses and associated water bodies are not impacted by any pollution which may occur from the proposed works.</p> <p><b>Construction Phase:</b></p> <p>Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased siltation, nutrient release and/or contamination.</p> <p><b>Operational Phase:</b></p> <p>Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased siltation, nutrient release and/or contamination.</p> <p><b>Decommissioning Phase:</b></p> <p>Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased</p>

River Barrow and River Nore SAC (002162)			
Qualifying Interest Species	Potential Presence within Zone of Influence	Potential for Likely Significant Effects	Screening Outcome
			siltation, nutrient release and/or contamination.
<i>Alosa fallax fallax</i> (Twaite Shad) [1103]	Regular breeding of this species has not been confirmed in the River Breagagh or River Nore in recent years (NPWS 2011).	No potential source-pathway-receptor links to this species, therefore no potential impact.	Screened out
<i>Salmo salar</i> (Atlantic Salmon) [1106];	The characteristics of the riverine habitats of the Coolcullen Stream are mainly shallow riffles and glides, suited to juvenile trout and salmon as rearing habitat. The Knocknabranagh and Knockbaun stream has good habitats for juvenile salmon. Poor access to upper reaches of rivers noted due to issues with the weir/fish pass at Coan Bridge downstream of the site.	Pollution/release of suspended solids.	<p>Due to Atlantic Salmon being sensitive to water quality changes, site specific mitigation is required ensure that the surrounding watercourses and associated water bodies are not impacted by any pollution which may occur from the proposed works.</p> <p><b>Construction Phase:</b> Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased siltation, nutrient release and/or contamination.</p> <p><b>Operational Phase:</b> Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased siltation, nutrient release and/or contamination.</p> <p><b>Decommissioning Phase:</b> Potential run-off and/or discharge from site works into the receiving aquatic environment on site through increased</p>

River Barrow and River Nore SAC (002162)			
Qualifying Interest Species	Potential Presence within Zone of Influence	Potential for Likely Significant Effects	Screening Outcome
			siltation, nutrient release and/or contamination.
<i>Lutra lutra</i> (Otter) [1355]	<p>No signs of Otter were recorded at the wind farm site or at any of the watercourse crossings for the grid connection route or haul route works locations. Given the limited nature of the works on Black Bridge, it is unlikely that there will be any significant disturbance or displacement effects on faunal QIs as a result of the project.</p> <p>It is possible however, that in the absence of mitigation that some disturbance and displacement of faunal qualifying interests (particularly Otter) could occur as a result of the construction activity.</p>	Disturbance/displacement of species.	Site specific mitigation is required to ensure no impact on this species occurs during the construction phase.
<i>Margaritifera durrovensis</i> (Nore Pearl Mussel) [1990]	<p>The population of Nore Pearl Mussel stretches from Poorman's Bridge to Lismaine Bridge, with most of the population found between Poorman's Bridge and the Avonmore Creamery above Ballyragget (NPWS July 2011).</p> <p>Given that the closest population lies distant and upstream of the project site, any potential for likely significant effects on this species in relation to the project can be ruled out.</p>	No potential source-pathway-receptor links to this species, therefore no potential impact.	Screened out

**Table 3: Qualifying Interests of the River Barrow and River Nore SAC and the Potential for Likely Significant Effects**

River Nore SPA (004233)				
Qualifying Species	Interest	Potential Presence within Zone of Influence	Potential Impacts	Screening Outcome
Kingfisher ( <i>Alcedo atthis</i> ) [A229]		<p>This SPA is designated for the conservation of the aquatic bird species, the Kingfisher. A survey in 2010 recorded 22 no. pairs of Kingfisher within the SPA.</p> <p>The small streams that drain the wind farm site and grid connection route are unattractive for nesting Kingfishers and would represent sub-optimal foraging habitat for this largely sedentary species. The SPA itself is located over 25km downstream of the wind farm site.</p> <p>Given the distances involved between the project site and the SPA, there is no likelihood of any direct impacts arising on Kingfisher.</p> <p>However, given that there is a hydrological link, albeit distant, there is some potential, in the absence of adequate mitigation for impact upon the habitat and prey abundance within the SPA.</p>	Prey availability and habitat degradation.	Site specific measures will be required so no degradation of the feeding resource of Kingfisher and the habitat where it occurs as a result of the project. The potential for mobilisation of silt and other contaminants is greatest during the construction stage. However, in the absence of adequate environmental controls there is some likelihood of runoff resulting in a deterioration in water quality in areas downstream of the project site, post construction and in the decommissioning phase.

**Table 4: Qualifying Interests of the River Nore SPA and the Potential for Likely Significant Effects**

It is concluded that there would be no impacts from the project on all other designated sites located beyond 15km from the project site.

**Table 5** identifies the sites in the hinterland of the permitted wind farm development that could potentially be impacted by the construction and operation of a wind farm at this location.

Site Name	Site Code	Potential Impacts Identified	NIS Required
River Nore and River Barrow SAC	000165	Indirect impacts on qualifying habitats and species during construction as a result of hydrological links.	Yes
River Nore SPA	004233	Ex-situ impacts on qualifying species	Yes
Lisbigney Bog SAC	000869	None	No

**Table 5: Summary of Potential Impacts identified in the Screening Exercise**

#### 4.1. Conclusion of Screening Exercise

2 no. of the 3 no. Natura 2000 sites closest to the wind farm development site have hydrological links to the project site and, as such, require further consideration as part of a Stage 2 Natura Impact Statement.

The remaining Natura 2000 sites in the wider receiving environment will not be impacted by the project as they do not contain mobile/migratory qualifying species and they are not hydrologically linked to the development area. A Finding of No Significant Effects (FONSE) Report has been completed for these sites (below).

#### 4.2. Finding of No Significant Effects (FONSE) Report

Name and location of the Natura 2000 sites	See <b>Figure 5</b> above Lisbigney Bog SAC (000869) and more distant Natura 2000 sites beyond 15km of the project.
Description of the project or plan	The project will include 7 no. wind turbines with an overall tip height of 185m, and all associated ancillary infrastructure; all associated and ancillary site development, excavation, construction, landscaping and reinstatement works, including the provision of site drainage infrastructure, upgrades to the turbine component haul route; and construction of an electricity substation and installation of c. 15km of underground grid connection cable between the White Hill Wind Farm and the existing Kilkenny 110kV electricity substation. Permission is sought for 35 years of operation beyond which the wind farm will be decommissioned.
Is the Project or Plan directly connected with or necessary to the management of the site (provide details)?	No.
Are there other projects or plans that together with the project of plan being	No.

assessed could affect the site (provide details)?			
The Assessment of Significant Effects			
Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 site.	The project is highly unlikely to affect the Natura 2000 sites, listed above, or located in the wider hinterland, due to the reasons outlined in the following section.		
Explain why these effects are not considered significant.	<p>No significant effects are envisaged to affect the Natura 2000 site as result of activities associated with the development site due to the following considerations:-</p> <ul style="list-style-type: none"> <li>• These sites are located at significant distance from the project site and/or lack any realistic ecological pathway for any impacts arising from the construction, operation or decommissioning phases of the wind farm to have likely significant effects.</li> </ul>		
Data Collected to Carry out the Assessment			
Who carried out the assessment	Sources of Data	Level of assessment completed	Where can the full results of the assessment be accessed and viewed
Dr Gavin Fennessy Athena Michaelides Ecology Ireland Wildlife Consultants Ltd.	Extensive desktop study of online, consultation and extensive field surveys	NIS (based on information collected for the project)	Screening Report included.

**Table 6: Lisbigney Bog SAC Findings of No Significant Effects**

## 5. Stage 2: Natura Impact Statement

The European Communities (Birds and Natural Habitats Regulations 2011 (S. I. No. 477 of 2011 as amended) defines a Natura Impact Statement (NIS) as *'a report comprising the scientific examination of a plan or project and the relevant European Site or European Sites, to identify and characterise any possible implications of the plan or project individually or in combination with other plans or projects in view of the conservation objectives of the site or sites, and any further information including, but not limited to, any plans, maps or drawings, scientific information or data required to enable the carrying out of an Appropriate Assessment.'*

The NIS is a scientific examination that identifies and characterises any possible implications the project may have (either individually or in combination with other plans and projects) on the conservation objectives of any 'screened-in' European Site(s), taking into account the full scope of these objectives whether generic or site specific. It must also identify and detail any proposed mitigation measures needed to avoid, reduce or eliminate likely significant effects on a European Site or adverse effects on the integrity of a European Site.

As a scientific examination, all findings arrived at must be clear and precise, and must be supported by data, evidence and analysis and by best scientific knowledge and objective information, including baselines and trends. All sources of information must

also be cited. The purpose of this NIS is to provide adequate information to enable the competent authority to undertake and complete the AA of the project.

Following an initial screening exercise, it was not possible to rule out potentially significant impacts (either alone or in combination with other plans or projects) on a number of Natura 2000 sites as a result of the project. Therefore, the assessment process has proceeded to Stage 2. The potential impacts on the conservation objectives and qualifying interests of the Natura 2000 sites as a result of the project are discussed in detail below.

Construction, operational and decommissioning phase impacts are assessed. This focussed assessment considers the potential for adverse impacts upon the QIs/SCIs of the designated sites.

### 5.1. Impact Assessment & Conservation Objectives

According to the Habitats Directive, the conservation status of a natural habitat will be taken as 'favourable' within its biogeographic range when:-

- its natural range and areas it covers within that range are stable or increasing;
- the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and,
- the conservation status of its typical species is favourable as defined below.

According to the Habitats Directive, the conservation status of a species means the sum of the influences acting on the species concerned that may affect the long-term distribution and abundance of its populations. The conservation status will be taken as 'favourable' within its biogeographic range when:-

- population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;
- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and,
- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

These outline goals form the basis of conservation objectives developed for Natura 2000 sites by NPWS and are published online as 'Generic Conservation Objectives' for Natura 2000 sites in Ireland.

Site specific conservation objectives are also available for the Natura 2000 sites which were identified at the screening stage as having likely significant effects (in the absence of mitigation):-

- River Nore and River Barrow SAC (002162); and,
- River Nore SPA (004233)

The project site is not located within any Natura 2000 site. Details on the key features (qualifying and special conservation interests) of the Natura 2000 sites where likely significant effects could occur in relation to the project (as described in the screening stage assessment) are presented in **Tables 4 & 5**. Full details of the site synopses and conservation objectives of each of these sites as published by NPWS are available online ([www.npws.ie](http://www.npws.ie)). The latest revision of the conservation objectives of the River

Barrow & River Nore SAC is dated 19 July 2011. For the River Nore SPA, the conservation objectives are dated 12 October 2022.

### 5.1.1. Characterising Impacts

The methodology for the assessment of impacts is derived from the *Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites* (EC, 2002). When describing changes/activities and impacts on ecosystem structure and function, the types of impacts that are commonly presented include the following:-

- direct and indirect effects;
- short- and long-term effects;
- construction, operational and deconstruction/demolition effects; and,
- isolated, interactive and cumulative effects.

Impacts that could potentially occur through the implementation of the project can be categorised under a number of impact categories, as outlined in the EC 2002 document, as follows:-

- Loss/Reduction of habitat area;
- Disturbance to key species;
- Habitat or species fragmentation;
- Reduction in species density; and,
- Changes in key indicators of conservation value such as decrease in water quality and quantity.

### 5.1.2. Meaning of 'Adversely Affect the Integrity of the Site'

The concept of the 'integrity of the site' is explained in the EU publication *Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC*, as follows:-

*'It is clear from the context and from the purpose of the directive that the 'integrity of the site' relates to the site's conservation objectives. For example, it is possible that a plan or project will adversely affect the integrity of a site only in a visual sense or only habitat types or species other than those listed in Annex I or Annex II. In such cases, the effects do not amount to an adverse effect for purposes of Article 6(3), provided that the coherence of the network is not affected. On the other hand, the expression 'integrity of the site' shows that focus is here on the specific site. Thus, it is not allowed to destroy a site or part of it on the basis that the conservation status of the habitat types and species it hosts will anyway remain favourable within the European territory of the Member State.*

*As regards the connotation or meaning of 'integrity', this can be considered as a quality or condition of being whole or complete. In a dynamic ecological context, it can also be considered as having the sense of resilience and ability to evolve in ways that are favourable to conservation. The 'integrity of the site' has been usefully defined as 'the coherence of the site's ecological structure and function, across its whole area, or the habitats, complex of habitats and/or populations of species for which the site is or will be classified'*

A site can be described as having a high degree of integrity where the inherent potential for meeting site conservation objectives is realised, the capacity for self-repair and self-renewal under dynamic conditions is maintained, and a minimum of external management support is required. When looking at the 'integrity of the site', it is therefore

important to take into account a range of factors, including the possibility of effects manifesting themselves in the short, medium and long-term.

The integrity of the site involves its ecological functions. The decision as to whether it is adversely affected should focus on, and be limited to, the site's conservation objectives.

## 5.2. Potential Impacts on Qualifying Species of the Natura 2000 Sites

The Natura 2000 sites assessed in this NIS are as follows:-

- River Barrow and River Nore SAC (002162); and,
- River Nore SPA (004233).

The screening process identified a number of QIs/SCIs that could be affected by the project. For the River Barrow and River Nore SAC, this included Freshwater Pearl Mussel, White-clawed Crayfish, Sea, River and Brook Lamprey Atlantic Salmon and Otter; and for the River Nore SPA, Kingfisher.

The potential impacts of the project on the conservation objectives of these Natura 2000 sites are discussed below. The current conservation objectives of these Natura 2000 sites have been summarised in **Table 3.2** and are presented in full at **Table A1** (at **Annex 1**). The purpose of the conservation objectives of the Natura 2000 sites are to maintain the favourable conservation status of the key species and habitats for which the sites have been designated. As highlighted at the screening stage, there is no potential for adverse impacts arising for many of the QIs/SCIs due to their distribution or other features of their ecology.

### 5.2.1. Evidence of Occurrence of the Key Receptors

As part of the screening stage process, the QIs and SCIs of the 2 no. Natura 2000 sites hydrologically connected to the project site were considered in terms of the likelihood that they could be impacted upon during any stage of the project. Several aquatic fish and invertebrate species as well as Kingfisher and Otter were considered to be the only QIs/SCIs potentially at risk of impact. In this section, we present what is known and what was recorded in relation to the occurrence of these species in the area.

#### 5.2.1.1. River Barrow & River Nore SAC

Electrofishing surveys carried out on the watercourses that drain the project site did not record Lamprey. This is consistent with a wider survey carried out by Inland Fisheries Ireland (IFI); with 11 no. sites were surveyed in the Dinin River catchment during July and August 2017 by IFI<sup>4</sup>. No lamprey species were captured. There is almost no stable optimal lamprey ammocoete habitat within sections of the watercourses draining the wind farm site; limited by the stream's high energy nature and low fine sediment input. It is likely however, that there are Lamprey populations of the rivers downstream of the project.

As the Coolcullen Stream passes through the project site, the characteristics of the riverine habitats are mainly shallow riffles and glides, suited Atlantic Salmon as rearing habitat. Rearing areas for juvenile salmonids are plentiful, and this is reflected in the findings of the electrofishing survey. The Coolcullen Stream is considered to be too small for spawning adult salmon. The middle and lower stretches of the Knocknabranagh &

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<sup>4</sup> [http://wfdfish.ie/wp-content/uploads/2019/03/SERBD\\_Dinin\\_2017.pdf](http://wfdfish.ie/wp-content/uploads/2019/03/SERBD_Dinin_2017.pdf)

Knockbaun Stream is in excellent condition hydromorphologically. There are riffles, pools and glides in optimal proportions, providing a good variety of habitats for juvenile salmonids. However, the stream is considered too small for spawning adult salmon. The electrofishing survey recorded relatively few Atlantic Salmon in the vicinity of the wind farm site. The likely reason for this, which was identified during the site walkover, and has also been identified by the Nore Suir River Trust<sup>5</sup>, is a fish passage issue at Coan Bridge, approximately 4km downstream of the project site. The apron of Coan Bridge is completely impassable to fish as it is a multi-tiered shallow laminar flow with no plunge pool on each tier to give migrating fish a break and to give them the depth needed to leap to the next tier. Therefore, passage at Coan Bridge depends completely on the fish pass, which is a Denil style fish pass.

Extensive Freshwater Pearl Mussel (FPM) surveys were undertaken under licence. No Freshwater Pearl Mussels were recorded. Although the water chemistry is suitable for FPM, some of the physical parameters appear to render the stretch of watercourse surveyed unsuitable, particularly the presence of excessive mobile gravels and the highly erosive nature of the watercourse. Downstream of the confluence of the Coolcullen and Knocknabranagh & Knockbaun streams, along the Coolcullen River, signs of erosion are plentiful and, in places, severe. Banks of freshly exposed soil and subsoil are a common feature of the river corridor, as are man-made attempts to remediate such erosion. Large embankments of deposited gravels are very common, with many instances of evidence to suggest that the gravels become mobile on a regular basis<sup>6</sup>. *Ecology of the Freshwater Pearl Mussel* (Skinner *et al.*, 2003) states on multiple occasions that good riverbed stability is an important parameter for the presence of FPM, and only a small proportion of the watercourse was found to be stable during the FPM survey. Additionally, Skinner *et al.* (2003) claim that gradient could affect mussel distribution indirectly by determining the stability of the substrata, and that an intermediate gradient range of 0.8–3 m/km was preferred. The stretch of watercourse surveyed downstream of the project site has a gradient ranging from 8m/km to 20m/km, while the Coolcullen and Knocknabranagh & Knockbaun streams within the wind farm site have a gradient of over 20m/km. Anon (2004) suggests that the watercourse should be 200m altitude or below. The entire Coolcullen and Knocknabranagh & Knockbaun streams channels are above 200m altitude. These physical and hydromorphological traits of the watercourse suggest that the stretch of watercourse surveyed may not be suitable for FPM.

In the *Conservation Objectives* document for the River Barrow and River Nore SAC (NPWS, 2011) it is stated that “*The status of the freshwater pearl mussel (Margaritifera margaritifera) as a qualifying Annex II species for the River Barrow and River Nore SAC is currently under review. The outcome of this review will determine whether a site-specific conservation objective is set for this species.*” This document provides no additional detail as to the presence or whereabouts of this species within the Barrow/Nore Catchments. As previously stated, the NBDC has no records of FPM within the Dinin Catchment.

Surveys were undertaken to assess the presence of non-volant mammals including Otter. No signs of Otter were recorded at the wind farm site or at any of the watercourse

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<sup>5</sup> [http://www.noresuirrivertrust.org/files/norebarriermigrationstudyver1\\_3.pdf](http://www.noresuirrivertrust.org/files/norebarriermigrationstudyver1_3.pdf)

<sup>6</sup> E.g. river gravel freshly deposited in tractor ruts at crossings, or on top of vegetation which was still alive and green underneath.

crossings for the grid connection route or haul route works locations. It is likely, given the nature of the watercourses present, that Otters occur locally, at least on occasion. Otters have historically been recorded from within the grid squares in which the project is located (NBDC).

White-clawed Crayfish are known to occur in the catchment. Their living requirements are rather similar to those of Brown Trout - good water quality (above 50% oxygen saturation, BOD below 3 ppm) and moderate summer water temperatures (below 20°C) although they only feed actively and moult above 10°C (Reynolds 1998). They are sensitive to acidity and heavy metals but may tolerate disturbance or recolonise affected area (loc cit.). Crayfish Plague is a highly contagious disease that decimates populations of White-clawed Crayfish in affected watercourses. The Crayfish Plague disease organism (a water-mould *Aphanomyces astaci*) is microscopic and invisible to the naked eye and is only viable in water. It is completely harmless to people, pets, livestock and all other freshwater organisms. Crayfish Plague was detected on the River Nore in 2019 ([www.npws.ie](http://www.npws.ie)). The presumption is made that any equipment which becomes wet and has been used in an affected catchment will be contaminated and there is a potential for spreading the disease to new sites. As White-clawed Crayfish are present in the catchment, there is some potential for construction phase impacts where machinery or personnel are working near watercourses.

#### 5.2.1.2. River Nore SPA

The River Nore SPA is designated for the protection of Kingfisher [A229]. It is located c. 11.5km over-land and c. 26km downstream of the project site. Kingfishers hold linear territories along the riparian corridor of from <1km to several kilometres in length (BWPI). Surveys on Irish river systems indicate they favour rivers with availability of vertical nesting banks of 1-2m in height (Cummins *et al.* 2010). The small streams that drain the wind farm site are unattractive for nesting Kingfishers and would represent sub-optimal foraging habitat for this largely sedentary species. Kingfisher was not recorded in the study area during the multi-year bird surveys.

### 5.3. Direct Habitat Loss

The project site is not part of the Natura 2000 sites in question does not require any resources from them, thereby ruling out any direct habitat loss from these conservation sites.

#### 5.3.1. Construction Phase

No direct loss of habitats will occur in designated Natura 2000 sites during the construction phase of this project.

#### 5.3.2. Operational Phase

No direct loss of habitats will occur in designated Natura 2000 sites during the operational phase of this project.

#### 5.3.3. Decommissioning Phase

No direct loss of habitats will occur in designated Natura 2000 sites during the decommissioning phase of this project.

### 5.4. Indirect Habitat Loss or Deterioration

Indirect habitat loss or deterioration of Natura 2000 sites within the surrounding landscape could occur from the effects of run-off or discharge into the aquatic

environment through increased siltation, nutrient release and/or contamination. This requires connectivity between the site and the designated site in question through watercourses and/or drainage ditches. A potential impact-receptor pathway exists between the hydrologically connected designated sites and the project site.

The wind farm site extends to an area of c. 290ha; however, the direct footprint (i.e. loss of habitat) of the wind farm infrastructure is small in comparison. The actual permanent land take is limited to the area of the turbine bases, crane hardstandings, the new and existing access tracks, the meteorological mast base and the electricity substation, which collectively account for c. 9ha). This is c. 3% of the total area of the wind farm site. Eroding/upland streams (FW1) and an extensive network of forestry and agricultural drainage ditches (FW4) have been installed across the study area and form a hydrological link between the study area and aquatic habitats in the wider locality including the EU designated site the River Barrow and River Nore SAC. There is, therefore, a pathway for adverse indirect hydrological/water quality effects such as nutrient release, siltation and/or contaminated run-off arising from the project site

No Annex I habitats listed under the EU Habitats Directive are present within the project site (including the grid connection route and haul route works locations). Additionally, no botanical species protected under the Flora (Protection) Order 2022, listed in the EU Habitats Directive or listed as flora of conservation concern in Ireland were recorded within the project site. The main habitats which will be directly impacted by the project works footprint include improved agricultural grassland (GA1) and Conifer plantation (WD4) which are of Local importance (Lower value). Other habitats which will be directly impacted include Hedgerows (WL1), Treelines (WL2) Wet grassland (GS4), Dry meadows and grassy verges (GS2) and Scrub (which are considered to be of Local importance (Higher value) and Exposed rock Local importance (Lower value).

Eroding upland river (FW1) habitat and flora associated with aquatic habitats in the project site and downstream could be negatively affected by the project through indirect hydrological/water quality effects such as nutrient release, siltation and/or contaminated run-off arising from the development works footprint.

#### 5.4.1. Construction Phase

Indirect effects during the construction phase relate to the risk of a deterioration in water quality which could adversely affect the water quality and the breeding or foraging activities of qualifying interests of the relevant SCIs/QIs. General enabling and construction works are likely to mobilise sediment and other contaminants through run-off. Tree felling, excavations, creation of new access tracks and upgrade of existing tracks, construction of turbine hardstanding areas, stream crossings and all other new hard surfaces are likely to contribute to the increase in runoff. In the absence of adequate mitigation run-off during construction could negatively impact upon the water quality downstream of the works area.

There are several mechanisms by which construction projects can negatively impact upon the aquatic environment. Kingfisher feed on small fish and macroinvertebrates (BWPI) and therefore a decrease in water quality could potentially impact on the prey availability for Kingfisher. Similarly, Otter feed on fish, frogs and other species reliant on water quality. Lamprey species are recognised as being sensitive to water pollution (Maitland, 2003) and compromised water quality. Freshwater Pearl Mussel require excellent water quality to reproduce and are sensitive to silt and sediment.

The chief mechanisms for negative indirect impacts to arise causing habitat loss or degradation in the construction phase relate to the following occurrences.

#### *Input of Silt*

As well as directly affecting fish through their gills, this has the potential medium/long term effect of settling on the riverbed smothering coarse patches of sediment with fine particles, and depleting oxygen levels within the sediment by reducing through-flow within the sediment. It may also cause direct mortality of eggs and early life stages of various fish. The deterioration of the riverbed in this manner has a detrimental effect on the macroinvertebrate assemblage, which also has a knock-on effect on fish. The likelihood of influx to the watercourse increases dramatically with rain, particularly heavy rain. Slope, ground porosity and vegetated cover are also significant factors governing the input of sediment to a watercourse.

#### *Input of Nutrients*

Excessive nutrients drive up productivity within a watercourse. Excessive plant and algal growth is caused by input of the plant nutrients nitrogen and phosphorus. In the presence of excessive growth of organic matter, ambient dissolved oxygen (DO) levels fall whilst the biochemical oxygen demand (BOD) rises (a measurement of the rate of oxygen usage by aerobic organisms). The preceding sentences are a brief overview of nutrient input, however in reality it is a complex science of parameters, drivers, knock-on effects and feedback systems that combine and deplete the oxygen levels in the watercourse. This can have a significant effect on fish life, as well as many species of invertebrates, often changing the species assemblage of the ecosystem itself.

#### *Input of Cement*

The introduction of cement to an aquatic environment can change the chemistry of the water (particularly pH and dissolved oxygen) as well as adding suspended solids, and as such has the potential to cause significant negative impacts on the stream. The significance and duration of the chemical effect is dependent on parameters such as quantity spilled, dilution rates, speed of remediation etc. However, an individual event could lead to a significant medium-term impact. Concrete spills can cause fish kills and can be detrimental to the macroinvertebrate community. The resultant reduction in water quality and its bio-indicators is in violation of the Water Framework Directive (2000/60/EC).

#### *Input of Hydrocarbons and other chemicals*

Spillage of hydrocarbons and other chemicals into the aquatic environment, depending on its character and magnitude, has the potential to cause significant effects of varying extents and durations. The spill can cause biotic mortality in a number/combination of ways, through physiochemical reactions (pH, DO, COD etc) or through direct toxicity.

#### *Hydromorphological Changes*

Hydromorphological changes can result from direct mechanical disturbance of the river, or significant changes within the catchment. Examples of direct mechanical disturbance include re-alignment of the channel, disturbance of connectivity to the flood plain, river crossings etc. Examples of significant changes within the catchment include large scale poorly designed drainage systems, drainage of wetlands, replacement of the vegetated surface with less permeable surfaces; all of

which can change the magnitude of flood events as well as the erosion-deposition regime within the main channel.

### *Biosecurity*

There is a risk to White-clawed Crayfish when working near water in areas where there is an extant population. The advice is that strict biosecurity is observed when working in all these catchments. The highest level of risk is moving equipment that has been used in an affected area to an unaffected catchment.

### *Clear Felling*

Approximately 15ha of conifer plantation are to be removed to make way for the turbine bases, crane hard-standing areas, and other ancillary infrastructure. The main issues pertaining to watercourses during clear felling are potential sediment and nutrient release. Sediment can be released during vegetation clearance mainly due to a combination of the removal of canopy, combined with the tracking of heavy machinery over unvegetated/exposed ground. Nutrients may also be released as a result of decomposing brush, in combination with nutrients released from changes in soil structure and stability. This could potentially impact species including the fish and invertebrate QIs identified as part of the screening process and impact upon the feeding resource of species including Otter and Kingfisher.

Clear felling is part of the current land usage, with or without the project, in line with current timber industry practices. The forestry present is first rotation commercial plantation.

### *Earthworks*

There will be significant earthworks onsite during the construction of the project. Excavation, storage and movement of soil, sub-soil and rock will be carried out for the provision of the various infrastructure. It is likely, in the absence of adequate controls, that silt, hydrocarbons and other chemicals could be released to watercourses, as well as inducing hydromorphological change in watercourses. The runoff of sediment to watercourses can negatively impact on the aquatic ecosystem, impacting on fish and their habitats. Fish are sensitive to increased sediment loading and marked increases in runoff of silt could result in marked changes in the distribution and abundance of macroinvertebrates and fish in areas impacted by uncontrolled silt and sediment mobilisation.

Although there currently exists some access tracks within the site which will be upgraded, the majority of the access tracks will be newly created. The passage of machinery on these gravel tracks, particularly heavy machinery, can also cause release of sediment into watercourses. There are a number of processes through which this can happen including wear and break-down of surface gravels, degradation of tracks due to a combination of weight and vibration, damage to roadside drainage, and importation of sediment on wheels and tracks. This is also likely in the absence of adequate mitigation to input hydrocarbons to watercourses.

In the absence of adequate environmental controls, the runoff during construction would have the potential to cause moderate to significant negative effects on aquatic ecosystems in the temporary to short-term. The extent of this impact would be dependent on the nature and volume of the mobilised silt and the watercourses to which this material discharged. In general, runoff will disperse and settle-out depending on the particle size and flow conditions in the watercourse.

This could potentially impact species including the fish and invertebrate QIs identified as part of the screening process and impact upon the feeding resource of species including Otter and Kingfisher.

#### *Dewatering and Pouring of Concrete*

Excavations may require dewatering due to water table issues, or heavy rain. This water is usually laden with suspended solids and the suction associated with the pumping may increase the level of suspended solids further. The pouring of foundations will involve conveying and handling concrete onsite. This is brought in bulk in concrete trucks, which will typically require washing-out after they have emptied their loads. This may, in the absence of adequate controls, introduce silt and cement to aquatic environments. Cementitious run-off can cause fish kills and can be detrimental to the macroinvertebrate community. This could potentially impact species including the fish and invertebrate QIs identified as part of the screening process and impact upon the feeding resource of species including Otter and Kingfisher.

#### *Chemical Spillage*

The operation and maintenance of the machinery onsite involves the use of hydrocarbon derivatives such as diesel, hydraulic fluid (including brake fluid) and various lubricants. Common causes for spillage include burst hose pipes, leaking tanks, spillage during refill/maintenance, incidents at the holding tanks. This may, in the absence of adequate controls, result in the introduction of pollutants to aquatic environments. This would likely result in some moderate to significant negative short-term impacts on fish and sensitive macroinvertebrate species. This could potentially impact species including the fish and invertebrate QIs identified as part of the screening process and impact upon the feeding resource of species including Otter and Kingfisher.

#### *Wind Farm Watercourse Crossings*

The effects caused by bridge crossings depend largely on their design and the nature of the river itself. Poorly designed bridges can block fish passage, genetically isolating resident fish species and making them vulnerable to becoming absent following severe drought/pollution events, as well as blocking access to much needed spawning and rearing habitat for anadromous species. Generally, the bridging of smaller watercourses and drainage ditches is less impactful than bridging rivers, and clear span bridges are generally the preferred option as they negate the majority of the issues regarding fish passage and construction stage pollution. Advice on the appropriate design of watercourse crossings has been integrated into the project from an early design stage and the stream crossings on the wind farm access tracks should not result in any blocking or impediments to the movement of aquatic species.

Any works in or near watercourses has the potential to temporarily cause disturbance to the immediate aquatic species and habitats and/or introduce disease agents or other contaminants. In the absence of appropriate environmental control, it could also inadvertently result in increased run-off or discharge of potential pollutants with a similar impact to that described above for the earthworks phase. In the absence of adequate mitigation, the runoff during installation of the stream crossings would have the potential to cause moderate to significant negative local effects on aquatic ecosystems in the short-term.

The works on the haul route at Black Bridge will not require any in-stream works. This watercourse crossing is directly upstream of the River Barrow and River Nore SAC. The works will be carried out over a short time period and do not have a significant likelihood for discharging potential pollutants into the River Dinin. However, given the sensitivity of the location, proximate to the SAC, it will be necessary to fully mitigate any potential risks, no matter how remote these may be. Given the proximity to the sensitive aquatic ecosystem, it is concluded that without adequate environmental controls that there is some potential for mobilisation of contaminants, including cementitious material, during the bridge strengthening work.

This could potentially impact species including the fish and invertebrate QIs identified as part of the screening process and impact upon the feeding resource of species including Otter and Kingfisher.

#### *Grid Connection Watercourse Crossings*

In the absence of adequate environmental controls, the watercourse crossings (including by horizontal directional drilling [HDD]) could potentially result in run-off to watercourses and/or breakout of lubricants during the HDD process. The likelihood of such impacts is remote given that HDD is a well proven method for crossing watercourses and is preferred to engineering solutions that involve direct in-stream works. It would be necessary to check and ensure that there are no signs of Otter holts or other features sensitive to disturbance in or close to the crossing locations ahead of any works.

In the absence of adequate environmental controls, these watercourse crossing works could potentially impact species including the fish and invertebrate QIs identified as part of the screening process and impact upon the feeding resource of species including Otter and Kingfisher.

#### *5.4.2. Construction Phase*

The likely operational phase effects are largely related to the turbine activity and to a lesser extent to the maintenance of the site infrastructure. Following the completion of the construction phase and the recolonisation of disturbed ground, there will be no additional removal of habitat during the operational phase.

Site traffic will be greatly reduced during the operational phase in comparison to the construction phase. Maintenance activities could potentially give rise to discharges of silt, hydrocarbons and other chemicals into watercourses. In the absence of appropriate controls, there is a risk of leakages of oils, fuels and other hydrocarbons from plant & machinery, turbine transformers and the electricity substation. However, it should be noted that during the operational phase, only small quantities of hydrocarbons will be present.

As outlined in previous sections, the project will result in the replacement of the vegetated surface with less permeable surfaces within the wind farm (e.g., hardstands, access tracks etc.) which may result in an increase in the proportion and velocity of surface water run-off reaching the surface water drainage network and receiving watercourses. During storm rainfall events, additional run-off coupled with increased velocity of flow could increase hydraulic loading, resulting in erosion of watercourses. This could potentially lead to adverse effects on aquatic habitats and flora, most notably through sedimentation of instream habitats through increased erosion rates.

The grid connection route will be undergrounded within the carriageway and therefore there will be no risk of operational phase habitat related impacts arising in relation to the cable connection.

The likelihood of operational phase indirect effects causing loss or deterioration of habitats of importance for the QIs/SCIs under consideration is markedly lower than in the construction phase. However, there is a requirement to continue to manage the potential risks to surface water into the operational phase. In the early stages of operation, swales and check dams will continue to be required to manage the risk of damaging run-off. Similarly, as the operational phase will see a marginal increase in impermeable surfaces within the site there is a risk of higher rate of run-off in the absence of appropriate attenuation measures. There will be fuels stored on site and there are lubricants etc. stored at the site which, if inappropriately stored, could lead to negative impacts on water quality.

It is assessed that there is a likelihood of significant adverse effects on aquatic ecosystems and species arising during the operational stage in the absence of adequate monitoring and mitigation. Spills and leaks, for instance, could result in significant impacts during the operational phase which would adversely impact upon the population of fish, macroinvertebrates, Otters and Kingfishers associated with the downstream designated sites.

#### 5.4.3. Decommissioning Phase

Impacts associated with the decommissioning phase are likely to be similar in nature, although less pronounced, both spatially and temporally, than those associated with the construction phase. Therefore, the risks to designated sites and their features of interest (and QIs/SCIs) are chiefly related to impacts on water quality from run off of sediment and other potential pollutants and also to increased disturbance associated with the movement of plant and personnel. These activities also have the potential to increase the risk of the spread of Invasive Plant species.

#### 5.5. Disturbance/Displacement of Species

The construction of the project, including the installation of the grid connection and works on the haul route, will involve the movement of plant and personnel. Operational phase disturbance/displacement may be related to the noise and/or visual stimulus from operational turbines and movement and plant and personnel associated with maintenance activities. Decommissioning phase disturbance/displacement impacts are likely to be similar in nature to those that could potentially occur at construction stage. These would principally be related to noise and visual stimuli associated with the movement of plant and personnel.

##### 5.5.1. Construction Phase

Kingfisher, the only SCI of the River Nore SPA is not likely to be disturbed or displaced as a result of the construction of the project. The SPA is located over 11km overland from the wind farm site and at least 26km downstream when measured along the hydrological route. The species is an aquatic bird that is typically only recorded along the riparian corridor and no Kingfishers were recorded in the vicinity of the wind farm site and the Coolcullen and Knocknabranagh and Knockbaun stream lack suitable breeding sites for the species. While it is possible that Kingfishers occur more locally than the closest part of the SPA, there is no likelihood of significant disturbance or displacement effects arising from the project.

With the exception of Otter, the QIs of the River Barrow and River Nore SAC are aquatic invertebrates or fish species not susceptible to typical sources of disturbance/displacement (e.g. terrestrial construction). Otters are highly mobile and while closely associated with the riparian corridor they can forage and choose to breed away from the watercourse. Given the presence of watercourses at the wind farm site and along the haul and grid connection routes, Otters are likely to occur in the vicinity of the project. No signs of Otters were recorded at the watercourse crossings, including at Black Bridge. It is possible however, that in the absence of mitigation that some disturbance and displacement of Otter could occur as a result of the construction activity.

The likelihood of site traffic leading to a risk of road casualties of Otter is limited. The bulk of construction traffic and movement of machinery and personnel will occur during daylight hours and the site speed limits will be imposed. Therefore, there is no risk of significant fatalities of Otter occurring. Some disturbance effects on Otter are possible due to the construction of the wind farm, grid connection infrastructure and completion of the haul route works. This could occur if there was breeding, resting, foraging or commuting sites of importance for Otter close to areas where construction was ongoing (e.g. watercourse crossing).

#### 5.5.2. Operational Phase

No operational phase disturbance or displacement impacts on Otter (or any other QIs/SCIs) are predicted. For instance, there is no likelihood of disturbance/displacement (including collision mortality) of Kingfishers as the species is so closely associated with the riparian corridor. It is not a species that is likely to be recorded close to the above ground infrastructure of the project.

#### 5.5.3. Decommissioning Phase

Similar to the construction phase, there is some likelihood of disturbance and displacement effects during the decommissioning phase on Otters and, to a lesser extent, Kingfishers, present locally; however, effects are assessed to be of a reduced magnitude and significance. It is assumed that the stream crossings on the wind farm tracks will be left in situ. The works to dismantle and remove the above ground structures will involve a potential temporary and localised increase in potential sources of disturbance. No works will be necessary on the haul or grid connection route. As there will be no works in or adjacent to watercourses, there is no potential for significant adverse impacts upon the fish and macroinvertebrate QIs of the River Barrow & River Nore SAC associated with the decommissioning phase of the project.

### 5.6. Cumulative and In Combination Effects

In order to fully assess the potential impact of the project on Natura 2000 sites, the project must be assessed alone or in combination with existing activities and proposed plans for the region. Myplan.ie, *Carlow County Development Plan 2022-2028* and *Kilkenny City and County Development Plan 2021-2027* were consulted in order to determine if there were any other plans or projects in the area which could result in cumulative impacts. These plans and projects are considered further in this respect in **Table 7** below.

The majority of consent applications pertain to one-off residential dwelling or farm buildings/structures along the local and regional roads. The scale of these applications will not have an effect on the designated sites in the wider receiving environment and

therefore as stated in the accompanying NIS, there is no potential for significant in-combination/cumulative effects with the proposed development arising from such developments.

Given the nature of the subject project and the species that are most likely to be subject to cumulative and in-combination effects from other projects in the wider area, developments such as other wind farms are highlighted as those of key relevance to the assessment of likely construction and operational phase effects. Accordingly, effects upon bird species through cumulative loss of habitat, displacement effects, collision mortality and barrier impacts; in addition to cumulative effects surface water quality; have been assessed.

The Seskin Wind Farm is located c. 2km northeast of the White Hill Wind Farm. 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. The site of the Seskin Wind Farm is dominated by commercial conifer plantation; some of which is likely to be lost to accommodate the construction and operation of the project. However, due to the abundance of this habitat type within the local and wider landscape, cumulative effects are not assessed as likely. The Seskin Wind Farm is also located within the same surface water sub-catchment as the subject project. Therefore, cumulative effects on aquatic habitats and species may, in the absence of appropriate environmental controls, arise.

The 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. No cumulative effects on sensitive habitats, aquatic habitats and species are likely to occur due to separation distance and given that the Freneystown is largely located within a different surface water sub-catchment.

The Bilboa Wind farm is located c. 4.5km northeast of the subject project. The wind farm site is located in an area dominated by conifer plantation over peatland. The wind farm site drains largely to the Nore catchment and partially to the Barrow. Due to separation distance, the findings of the assessments in the preceding sections, the measures described at **Section 5.5** below, and the measures set out in respect of the Bilboa Wind Farm; there is no likelihood of significant cumulative effects arising on designated sites, habitats, birds, mammals, and aquatic species.

The Pinewoods Wind Farm is located c. 20km northwest of the subject project. Given the findings of the EIAR and NIS in respect of that project, the mitigation measures to be implemented, the findings of the assessments in the preceding sections, the measures described at **Section 5.5** below, and the measures set out in respect of the Pinewoods Wind Farm; there is no likelihood of significant cumulative effects arising on designated sites, habitats, birds, mammals, and aquatic species.

The closest operational wind farm is located at Gortahile in Co Laois; c. 5.5km to the northeast. It is located in an upland area with a high proportion of mature forestry cover. No other operational wind farms are located within 10km of the subject project. Other more distant wind farms such as the Kilbranish Wind Farm and Greenoge Wind Farm in Co. Carlow and Foyle Wind Farm and Lisdowney Wind Farm in Co. Kilkenny are relatively distant from the proposed wind farm.

We are also aware of proposed wind farm developments at Ballynalacken, Co. Kilkenny, and Coolglass, Co. Laois; each of which are located in excess of 15km from the subject project.

No other projects were identified which are considered likely to act cumulatively upon the local ecology (habitats and species) and the subject project.

Potential cumulative effects in relation to other developments include construction and decommissioning phase related surface-water run-off, where qualifying interests associated with River Barrow and River Nore SAC and the River Nore SPA could be subject to cumulative impact through hydrological or water quality impacts such as increased siltation, nutrient release and contaminated run-off arising from other developments. Potential operational phase cumulative effects arising from increased overall number of turbines in the local area and resulting disturbance/displacement effects on QI/SCI species was considered. Given the number of operational, permitted and proposed turbines in the area, there is no likelihood of a cumulative disturbance/displacement or barrier effect on birds. The relatively small number of turbines overall and the fairly dispersed nature of the developments makes the likelihood of any significant cumulative or in combination effects on birds from the wider SPA network or the QI species of the River Barrow & River Nore SAC very unlikely.

All of these projects have been considered on their own and in relation to the potential for any cumulative or in combination impacts arising from any combination of these projects proceeding in the future.

Taking the above into consideration, along with the proposed environmental management and controls integrated into the project design here and for other projects planned or proposed in the area cumulative and in-combination effects relating to other developments are not considered to be relevant in this case.

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 <sup>7</sup>

<sup>7</sup> 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 project is not materially different to that which has previously been permitted.

Development	Planning Register Reference	Development Description	Status
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 <sup>8</sup>
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 <sup>9</sup>	N/A	Up to 7 no. wind turbines and all associated infrastructure	Proposed
Freneystown Wind Farm, Co. Kilkenny <sup>10</sup>	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

<sup>8</sup> 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.

<sup>9</sup> 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.

<sup>10</sup> 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.

Development	Planning Register Reference	Development Description	Status
			and Proposed
Residential Dwellings	Various	Various	Existing, Permitted and Proposed
Commercial Forestry Plantations	-	-	Existing

**Table 7: Projects considered in Cumulative Assessment**

## 6. Mitigation Measures

From the outset, an iterative process of constraints led design was employed for the project whereby independent ecological expertise was utilised at an early design stage in identifying the constraints and designing the site layout to take account of these constraints. The siting of the turbines and associated infrastructure was informed by the environmental constraints.

The mitigation measures described below are designed to address and minimise the effects of the project. The mitigation measures presented in the EIAR prepared for the project address the wider ecological effects of the project; and herein the focus is on the measures that will ensure that there is no adverse residual impacts on the sites and in particular the QIs/SCIs identified as being at risk. Mitigation to minimise the risk of adverse impacts upon designated sites and their conservation objectives are those chiefly relating to the environmental controls on works near watercourses and measures to minimise the risk of run-off to watercourses hydrologically connected to downstream Natura 2000 sites.

### 6.1. Construction Phase

The measures required to avoid adverse construction phase impacts on the designated sites potentially impacted by this project (i.e. those hydrologically connected downstream) largely relate to the protection of water quality. However, measures to ensure no disturbance and displacement occurs of Otter, or other aquatic/semi-aquatic species, are also important. These measures are based on current environmental guidance and professional experience and are proven effective at minimising potential impacts.

The following sections detail the overall mitigation commitments to address the likely effects identified on the receiving environment as a result of the project; with the specific implementation of these measures detailed at **Annex 3** of this NIS. A suitably qualified Ecological Clerk of Works (ECoW) will be employed to oversee the full and proper implementation of the ecological mitigation strategy throughout the construction and commissioning of the project.

The following mitigation measures will be put in place to ensure no adverse effects occur on the relevant Natura 2000 sites during the construction phase of the project:-

- The Surface Water Management System, with integrated silt management and flow attenuation management, will be implemented as follows:-

- Measures integrated into the drainage system will include silt traps, settlement ponds, check dams, silt fences, separated clean/dirty water drains and vegetated swales. Crucially, the site drainage system will not outflow to the existing drainage network directly, but will discharge, via settlement ponds and vegetated swales, to numerous buffered overland outfalls which will promote percolation and vegetation filtration. The large number of these outfalls across the site are intended to keep volumes at each outfall low thus ensuring high filtration efficiency and low erosion rates. The following are mitigations specific to the ecology of watercourses;
- The input of silt will be managed using a range of techniques integrated into the design of the Surface Water Management System including Altmuller and Dettmer type settlement ponds<sup>11</sup>, check dams, silt fences, vegetated swales and buffered overland outfalls;
- The input of nutrients, the main source being clear felling, will also be managed using aspects of the site drainage system, particularly the vegetated swales and the overland outflows. Clear felling, in line with current timber industry practices, is part of the current land usage and the proposed drainage design will improve outfall from this existing practice;
- The input of cement to watercourses will be mitigated onsite. Where concrete is delivered to the wind farm site, only the chute will be cleaned onsite. Chute cleaning water is to be isolated in temporary wash-out pits. No discharge of cement contaminated water to the construction phase drainage system or directly to any artificial drain or watercourse will be allowed;
- The input of hydrocarbons and other chemicals to watercourses will be mitigated against onsite. All plant will be inspected and certified to ensure they are leak free and in good working order prior to use on the wind farm site. On-site re-fuelling of machinery will be carried out using a mobile double skinned fuel bowser. The fuel bowser will be re-filled off site and will be towed/driven around the wind farm site to where machinery are located. Any chemical storage areas will be bunded appropriately for the fuel storage volume. An emergency plan for the construction phase to deal with accidental spillages will be contained within the CEMP. Spill kits will be available to deal with accidental spillages. In a worst-case scenario, if there is an incident onsite, the site drainage system does not discharge directly to any watercourse, thus insulating watercourses from such an event;
- Hydromorphological changes to watercourses, brought about by changes within the catchment, will be mitigated to a large extent by the use of settlement ponds and check dams to attenuate water, as well as vegetation swales and overland outfalls to promote percolation. As such, hydromorphological changes within watercourses are not expected as a result of the project;
- A Water Quality Monitoring Plan be put in place and will provide for an inspection and maintenance plan for the site drainage system. Regular inspections of all installed drainage systems will be undertaken, especially after

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<sup>11</sup> Settlement ponds will be as described in Altmuller & Dettmer; a design element that has been proven to work, both in the short and long term, and have clearly demonstrated results in terms of habitat improvement and FPM population dynamics. They also provide excellent spawning and larval habitat for frogs and newts.

- 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;
- Any excess build-up of silt levels at dams, the settlement ponds, or any other drainage features that may decrease the effectiveness of the drainage feature, will be removed. This will be given careful consideration by the ECoW. During the construction phase field testing, sampling and analysis of a range of parameters with relevant regulatory limits and EQSs will be undertaken for each primary watercourse at the wind farm site. Monitoring shall be carried out following heavy rainfall events and during 95<sup>th</sup> percentile low flow rates (the flow which is surpassed 95% of the time) as this is the stage when pressures and threats are highest on aquatic biota;
  - All instream works will be carried out in the months of July, August and September to avoid the salmonid spawning season and to avoid the times when the young of the year are at their most vulnerable;
  - In terms of directional drilling, the works, including launch and receiver pits, will be carried out outside 20m from each watercourse. This is the buffer zone width recommended by IFI. The drilling process shall be constantly monitored to detect any possible breakout or leaking of bentonite into the surrounding geology; this is gauged by observation and by monitoring pumping rates and pressures. Monitoring by an ecologist/environmental engineer will be required during directional drilling works. IFI and NPWS will be notified of the works in advance; and,
  - In terms of crossing within the bridge deck, critical elements with respect to aquatic ecology include for the placement of a sealed silt fence at both sides of the bridge crossing point and to a minimum of 10m upstream and downstream of each crossing on both sides of the road to divert water and runoff from the road into silt traps at each corner of the road. The size and design of these silt traps will vary and be suited to local conditions. The silt traps and sealed silt fence will be installed prior to any construction works commencing at the bridge crossing. An ecologist/environmental engineer will again be monitoring for the duration of the works.
- All plant will be checked for purpose of use prior to mobilisation at the watercourse crossing;
  - Works shall not take place during periods of heavy rainfall and will be scaled back or suspended if heavy rain is forecasted;
  - A minimum 10m buffer zone will be maintained between disturbed areas and the watercourse bank. There will be no storage of material/equipment, excavated material or overnight parking of machinery inside the 10m buffer zone;
  - Double silt fencing will be placed upslope of the buffer zone on each side of the watercourse and between the works area and adjacent rivers and streams on both banks;
  - Where it is necessary for access tracks to cross these drains/watercourses, the relevant bodies (e.g., Inland Fisheries Ireland, Office for Public Works (OPW), etc.) will be consulted prior to construction. As appropriate, a Section 50 Licence application will be made to the OPW prior to the installation of culverts/bridging structures over relevant watercourses;
  - The temporary construction compound has been located and designed such that all cabins, storage containers, waste management facilities and bunded areas will be located a minimum distance of 50m from all natural watercourses in order to minimise the risk of pollution and discharge to watercourses;

- Machine combinations (i.e., handheld or mechanical) will be chosen which are most suitable for ground conditions and which will minimise soils disturbance;
- Checking and maintenance of tracks and culverts will be ongoing through any felling operation. No tracking of vehicles through watercourses will occur. Where possible, existing drains will not be disturbed during felling works;
- Ditches which drain from the areas 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;
- Sediment traps will be sited in drains downstream of felling areas. Sediment will be carefully disposed of in the spoil disposal areas. All new silt traps will be constructed on even ground and not on sloping ground;
- Tree felling will be undertaken in accordance with the specifications set out in the Forest Service *Forestry and Water Quality Guidelines (2000)* and *Forest Harvesting and Environmental Guidelines (2000)*, to ensure a tree clearance method that reduces the potential for sediment and nutrient runoff;
- Timber will be stacked in dry areas, and outside the 50m watercourse buffer;
- Refuelling or maintenance of machinery will not occur within 100m of a watercourse;
- There will be no direct discharge to surface watercourses, and therefore no risk of hydraulic loading or contamination will occur;
- In-stream construction work (if/where required) will only be carried out during the period permitted by Inland Fisheries Ireland for in-stream works according to *Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters (2016)* (i.e., July 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 (any deviation from this will be done in discussion with the IFI);
- Prior to the commencement of vegetation clearance activity, a survey by an appropriately experienced ecologist will be carried out to confirm that no Third Schedule Plant species are present within the project site, including along the grid connection route and replant lands. If present, the full extent(s) of the invasive plant species will be mapped. The appointed contractor(s) will prepare and implement an Invasive Species Management Plan (ISMP) for the works with the input from a suitably qualified ecologist:-
  - The ISMP, if required, will be clearly communicated to all site staff and will be adhered to fully under the supervision of the ECoW. The control of some species may require the use of herbicides, which can pose a risk to human health, to non-target plants or to wildlife. In order to ensure the safety of herbicide applicators and of other public users of the site, a qualified and experienced contractor will be employed to carry out all work. The contractor will refer to and implement the following, which provides detailed recommendations for the control of invasive species and noxious weeds: Chapter 7 and Appendix 3 of the TII Publication *The Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads (NRA, 2008)*.
  - A Biosecurity Plan will be implemented to ensure that the risk of disease-causing agents (e.g. Crayfish Plague) are not spread by plant, machinery or personnel. This will involve cleaning and inspection of equipment, awareness and education training of site staff and appropriate signage where appropriate.

- Maintaining site hygiene at all times in an area where invasive non-native species are present is essential to prevent further spread. The following site hygiene measures will be implemented onsite during the construction and/or for maintenance works during the operational stage where applicable:-
  - Fence off the infested areas prior to and during construction works where possible in order to avoid spreading seeds or plant fragments around or off the construction site;
  - Clearly identify and mark out infested areas. Erect signs to inform Contractors of the risk;
  - Avoid if possible using machinery with tracks in infested areas;
  - Clearly identify and mark out areas where contaminated soil is to be stockpiled on site and cannot be within 75m of any watercourse or within a flood zone;
  - If soil is imported to the site for landscaping, infilling or embankments, the contractor will gain documentation from suppliers stating that it is free from invasive species;
  - Ensure all site users are aware of measures to be taken and alert them to the presence of the Invasive Species Management Plan;
  - Erection of adequate site hygiene signage in relation to the management of non-native invasive material as appropriate;
- All watercourse crossings will be surveyed prior to the commencement of work to identify any resting or breeding sites of protected mammal species such as Otter and/or Kingfisher;
  - If any breeding or resting sites of protected mammal species or Kingfisher are located at any stage in the construction phase, no works will continue until such time as the ECoW advises and/or any required derogation licences are in place;
- An ecologist will supervise/check areas where tree-felling and vegetation removal will occur prior to and during construction. This will ensure that any site-specific issues in relation to wildlife will be highlighted and appropriate mitigation measures (e.g., NRA/TII guidelines) are applied;
- Construction operations will largely take place during the hours of daylight to minimise disturbances to nocturnal mammal species such as Otter;
- All lighting systems will be designed to minimise nuisance through light spillage. Shielded, downward directed lighting will be used wherever possible and all non-essential lighting will be switched off during the hours of darkness;
- All edible and putrescible wastes will be stored and disposed of in an appropriate manner; and
- Any sightings of mammals on-site will be logged on the wildlife register. This includes any fatalities recorded during construction phase.

## 6.2. Operational Phase

As detailed in the Surface Water Management Plan, following the completion of construction and the re-vegetation of disturbed ground, the generation of 'dirty' water runoff will be significantly diminished. It is important to reiterate that areas of hardstanding will be impermeable and the majority of incident rainfall will percolate naturally to ground.

The following measures will also be implemented:-

- Infiltration interceptor drains will be retained for the duration of the project to ensure that up-slope ('clean') runoff is directed away from site infrastructure and managed in an appropriate manner;
- Swales and check dams (i.e. for the management of 'dirty' water) shall be retained for the duration of the project. The swales, having become vegetated, and check dams will act as a filtration feature for the low volume of surface water runoff arising and will be sufficient to ensure the avoidance of any deleterious matter being discharged to downstream watercourses. Accordingly, it is proposed that the silt/settlement ponds and lagoon-type sediment ponds will be decommissioned 1-year following the completion of construction. This period will ensure that the swales have become sufficiently vegetated to filter any silt/sediment which may arise;
- Interceptor drains will be installed up-gradient of all 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 used to collect runoff from access tracks, turbine hardstanding areas and substation compound areas which may contain entrained suspended sediment, and channel it to settlement ponds for sediment settling;
- Transverse drains ('grips') will be constructed, where appropriate, in the surface layer of access tracks to divert any runoff into swales/track side drains;
- Check dams will be used along sections of access tracks drains to intercept silts at source. Check dams will be constructed from a 40mm non-friable crushed rock or similar;
- Swales and check dams 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; and,
- Settlement ponds will be designed in accordance the greenfield runoff rate requirements; and,
- Imported rock for construction purposes and road surfacing will be strong, well graded limestone which will be resistant to erosion and have a low likelihood to generate fines in hardstand runoff. The operation of the underground grid connection will not result in any likely hydrological or water quality effects and therefore do not require mitigation measures.

Mitigation measures relating to oils and fuels are as follows:-

- Fuels stored on site will be minimised. Any storage areas will be bunded appropriately for the fuel storage volume for the time period of the construction;
- The substation transformer and oil storage tanks will be located in a concrete bund, impervious to rainwater ingress, capable of holding 110% of the stored oil volume;
- Turbine transformers will be located within the turbines, and any leaks will be fully contained within the turbine thus eliminating any pathway for leakages to affect land and soil;
- Maintenance vehicles will be regularly inspected for leaks and fitness for purpose; and

- An emergency plan for the operational phase to deal with accidental spillages will be contained within an Operational-Phase Environmental Management Plan. Spill kits will be available to deal with accidental spillages.

### 6.3. Decommissioning Phase

Decommissioning works will be governed by the same requirements to control run-off or potential pollution to watercourses as have been implemented during the construction phase:-

- A decommissioning plan will be prepared in advance of the works. This will include all appropriate surface water and spoil management commitments in keeping with the commitments provided in the CEMP and SWMP (see **Annex 3**) but updated to conform with the relevant contemporary legislation and guidance.

## 7. Natura Impact Statement Outcomes

The Natura 2000 sites considered in this NIS are as follows:-

- River Barrow and River Nore SAC (Site Code: 002162); and,
- River Nore SPA (Site Code: 004233)

### 7.1. Impacts on Key Species and Habitats

With the application of the proposed mitigation measures, particularly with regard to the implementation of surface water managements controls to avoid a deterioration in downstream water quality, significant impacts on the key species and habitats that define the structure or function of the Natura 2000 sites will not occur.

### 7.2. Impacts on the Integrity of the Natura 2000 Sites

With the application of the proposed mitigation measures, there is no pathway for significant impacts on the integrity of the Natura 2000 sites as a result of the project.

## 8. Conclusion

This NIS has fully considered the potential impacts of all aspects of the project, on its own and in combination with other projects and plans, on designated Natura 2000 sites in the wider receiving environment. The detailed mitigation commitments will be effective in ensuring that there are no residual impacts any Natura 2000 site, including the River Barrow & River Nore SAC and River Nore SPA. This conclusion has been reached on the basis of best available scientific information on the distribution and ecology of the key species and habitats for which these sites are designated and on the implementation of recognised, proven and effective mitigation measures.

The implementation of these control measures means that it can be concluded, in the light of best scientific knowledge, that there will be no significant effects, either individually or in combination with other plans or projects, adversely affecting the conservation interests or conservation objectives of the River Barrow & River Nore SAC and the River Nore SPA or any other Natura 2000 sites. It is therefore concluded that the project will not, beyond reasonable scientific doubt, adversely affect the integrity of any Natura 2000 site either directly or indirectly.

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**Annex 1 -  
Conservation Objectives of River Barrow & River Nore SAC and River Nore SPA**



Attribute	Measure	Target
[1130] Estuaries		
Habitat area	Hectares	The permanent habitat area is stable or increasing, subject to natural processes
Community distribution	Hectares	The following sediment communities should be maintained in a natural condition: Muddy estuarine community complex; Sand to muddy fine sand community complex; Fine sand with <i>Fabulina fabula</i> community.
Community extent	Hectares	Maintain the natural extent of the <i>Sabellaria alveolata</i> reef, subject to natural process
[1140] Tidal Mudflats and Sandflats		
Habitat area	Hectares	The permanent habitat area is stable or increasing, subject to natural processes.
Community distribution	Hectares	The following sediment communities should be maintained in a natural condition: Muddy estuarine community complex; Sand to muddy fine sand community complex
[1170] Reefs		
None Specified	-	-
[1310] Salicornia Mud		
Habitat area	Hectares	Area stable or increasing, subject to natural processes, including erosion and succession.
Habitat distribution	Occurrence	No decline, subject to natural processes
Physical structure: sediment supply	Presence/absence of physical barriers	Maintain or where necessary restore natural circulation of sediments and organic matter, without any physical obstructions



Attribute	Measure	Target
Physical structure: flooding regime	Hectares flooded; frequency	Maintain natural tidal regime
Physical structure: creeks and pans	Occurrence	Maintain/restore creek and pan structure, subject to natural processes, including erosion and succession
Vegetation structure: zonation	Occurrence	Maintain range of saltmarsh habitat zonations including transitional zones, subject to natural processes including erosion and succession
Vegetation structure: vegetation height	Centimetres	Maintain structural variation within sward
Vegetation structure: vegetation cover	Percentage cover at a representative sample of monitoring stops	Maintain more than 90% of area outside creeks vegetated.
Vegetation composition: typical species and sub-communities	Percentage cover at a representative sample of monitoring stops	
		Maintain range of sub- communities with typical species listed in Saltmarsh Monitoring Project
Vegetation structure: negative indicator species: <i>Spartina anglica</i>	Hectares	No significant expansion of <i>Spartina</i> . No new sites for this species and an annual spread of less than 1% where it is already known to occur
[1330] Atlantic Salt Meadows		
Habitat area	Hectares	Area stable or increasing, subject to natural processes, including erosion and succession
Habitat distribution	Occurrence	No decline, subject to natural processes
Physical structure: sediment supply	Presence/absence of physical barriers	Maintain/restore natural circulation of sediments and organic matter, without any physical obstructions



Attribute	Measure	Target
Physical structure: flooding regime	Hectares flooded; frequency	Maintain natural tidal regime
Physical structure: creeks and pans	Occurrence	Maintain/restore creek and pan structure, subject to natural processes, including erosion and succession
Vegetation structure: zonation	Occurrence	Maintain range of saltmarsh habitat zonations including transitional zones, subject to natural processes including erosion and succession.
Vegetation structure: vegetation height	Centimetres	Maintain structural variation within sward
Vegetation structure: vegetation cover	Percentage cover at a representative sample of	
	monitoring stops	Maintain more than 90% of area outside creeks vegetated
Vegetation composition: typical species and sub-communities	Percentage cover at a representative sample of monitoring stops	Maintain range of sub- communities with typical species listed in Saltmarsh Monitoring Project
Vegetation structure: negative indicator species: <i>Spartina anglica</i>	Hectares	No significant expansion of <i>Spartina</i> . No new sites for this species and an annual spread of less than 1% where it is already known to occur
[1410] Mediterranean Salt Meadows		
Habitat area	Hectares	Area stable or increasing, subject to natural processes, including erosion and succession. For sub-sites mapped: Dunbrody Abbey - 0.08ha, Rochestown - 0.04ha, Ringville - 6.70ha
Habitat distribution	Occurrence	No decline, subject to natural processes



Attribute	Measure	Target
Physical structure: sediment supply	Presence/absence of physical barriers	Maintain or where necessary restore natural circulation of sediments and organic matter, without any physical obstructions
Physical structure: flooding regime	Hectares flooded; frequency	Maintain natural tidal regime
Physical structure: creeks and pans	Occurrence	Maintain/restore creek and pan structure, subject to natural processes, including erosion and succession
Vegetation structure: zonation	Occurrence	Maintain range of saltmarsh habitat zonations including transitional zones, subject to natural processes including erosion and succession
Vegetation structure: vegetation height	Centimetres	Maintain structural variation within sward
Vegetation structure: vegetation cover	% cover at a representative sample of monitoring stops	Maintain more than 90% of area outside creeks vegetated.
Vegetation composition: typical species and sub-communities	% cover at a representative sample of monitoring stops	Maintain range of sub- communities with typical species listed in Saltmarsh Monitoring Project
Vegetation structure: negative indicator species: <i>Spartina anglica</i>	Hectares	No significant expansion of <i>Spartina</i> . No new sites for this species and an annual spread of less than 1% where it is already known to occur
[3260] Floating River Vegetation		
Habitat distribution	Occurrence	No decline, subject to natural processes
Habitat area	Kilometres	Area stable or increasing, subject to natural processes
Hydrological regime: river flow	Metres per second	Maintain appropriate hydrological regimes



Attribute	Measure	Target
Hydrological regime: groundwater discharge	Metres per second	The groundwater flow to the habitat should be permanent and sufficient to maintain tufa formation
Substratum composition: particle size range	Millimetres	The substratum should be dominated by large particles and free from fine sediments
Water chemistry: minerals	Milligrammes per litre	The groundwater and surface water should have sufficient concentrations of minerals to allow deposition and persistence of tufa deposits
Water quality: suspended sediment	Milligrammes per litre	The concentration of suspended solids in the water column should be sufficiently low to prevent excessive deposition of fine sediments
Water quality: nutrients	Milligrammes per litre	The concentration of nutrients in the water column should be sufficiently low to prevent changes in species composition or habitat condition
Vegetation composition: typical species	Occurrence	Typical species of the relevant habitat sub-type should be present and in good condition
Floodplain connectivity	Area	The area of active floodplain at and upstream of the habitat should be maintained
[4030] Dry Heath		
Habitat distribution	Occurrence	No decline from current habitat distribution, subject to natural processes
Habitat area	Hectares	Area stable or increasing, subject to natural processes. Habitat area is not known but estimated as less than 400ha of the area of the SAC, occurring in dispersed locations



Attribute	Measure	Target
Physical structure: free-draining, acid, low nutrient soil; rock outcrops	Occurrence	No significant change in soil nutrient status, subject to natural processes. No increase or decrease in area of natural rock outcrop
Vegetation structure: sub- shrub indicator species	Percentage cover	Cover of characteristic sub- shrub indicator species at least 25%: gorse ( <i>Ulex europaeus</i> ) and where rocky outcrops occur bilberry ( <i>Vaccinium myrtillus</i> ) and woodrush ( <i>Luzula sylvatica</i> ). Some rock outcrops support English stonecrop ( <i>Sedum anglicum</i> ), sheep's bit ( <i>Jasione montana</i> ) and wild madder ( <i>Rubia peregrina</i> ) as well as important moss and lichen assemblages
Vegetation structure: senescent gorse	Percentage cover	Cover of senescent gorse less than 50%
Vegetation structure: browsing	Percentage cover	Long shoots of bilberry with signs of browsing collectively less than 33%
Vegetation structure: native trees and shrubs	Percentage cover	Cover of scattered native trees and shrub less than 20%
Vegetation composition: positive indicator species	Number	Number of positive indicator species at least 2 e.g. gorse and associated dry heath/ acid grassland flora
Vegetation structure: positive indicator species	Percentage cover	Cover of positive indicator species at least 60%. This should include plant species characteristic of dry heath in this SAC including gorse, bilberry and associated acid grassland flora
Vegetation composition: bryophyte and non-crustose lichen species	Number	Number of bryophyte or non- crustose lichen species present at least 2



Attribute	Measure	Target
Vegetation composition: bracken ( <i>Pteridium aquilinum</i> )	Percentage cover	Cover of bracken less than 10%
Vegetation structure: weedy negative indicator species	Percentage cover	Cover of agricultural weed species (negative indicator species) less than 1%
Vegetation composition: non-native species	Percentage cover	Cover of non-native species less than 1%.
Vegetation composition: rare/scarce heath species	Location, area and number	No decline in distribution or population sizes of rare, threatened or scarce species, including Greater Broomrape ( <i>Orobanche rapum-genistae</i> ) and the legally protected clustered clover ( <i>Trifolium glomeratum</i> )
Vegetation structure: disturbed bare ground	Percentage cover	Cover of disturbed bare ground less than 10% (but if peat soil less than 5%)
Vegetation structure: burning	Occurrence	No signs of burning within sensitive areas
[6430] Hydrophilous Tall Herb Communities		
Habitat distribution	Occurrence	No decline, subject to natural processes
Habitat area	Hectares	Area stable or increasing, subject to natural processes
Hydrological regime: Flooding depth/height of water table	Metres	Maintain appropriate hydrological regimes
Vegetation structure: sward height	Centimetres	30-70% of sward is between 40 and 150cm in height
Vegetation composition: broadleaf herb: grass ratio	Percentage	Broadleaf herb component of vegetation between 40 and 90%



Attribute	Measure	Target
Vegetation composition: typical species	Number	At least 5 positive indicator species present
Vegetation composition: negative indicator species	Occurrence	Negative indicator species, particularly non-native invasive species, absent or under control- NB Indian balsam ( <i>Impatiens glandulifera</i> ), monkeyflower ( <i>Mimulus guttatus</i> ), Japanese knotweed ( <i>Fallopia japonica</i> ) and giant hogweed ( <i>Heracleum mantegazzianum</i> )
[7220] Petrifying Springs		
Habitat area	Square metres	Area stable or increasing, subject to natural processes
Habitat distribution	Occurrence	No decline
Hydrological regime: height of water table; water flow	Metres; metres per second	Maintain appropriate hydrological regimes
Water quality	Water chemistry measures	Maintain oligotrophic and calcareous conditions
Vegetation composition: typical species	Occurrence	Maintain typical species
[91A0] Old Oak Woodlands		
Habitat area	Hectares	Area stable or increasing, subject to natural processes, at least 85.08ha for sub-sites surveyed
Habitat distribution	Occurrence	No decline.
Woodland size	Hectares	Area stable or increasing. Where topographically possible, "large" woods at least 25ha in size and "small" woods at least 3ha in size



Attribute	Measure	Target
Woodland structure: cover and height	Percentage and metres	Diverse structure with a relatively closed canopy containing mature trees; subcanopy layer with semi- mature trees and shrubs; and well-developed herb layer
Woodland structure: community diversity and extent	Hectares	Maintain diversity and extent of community types
Woodland structure: natural regeneration	Seedling;sapling;pole ratio	Seedlings, saplings and pole age-classes occur in adequate proportions to ensure survival of woodland canopy
Woodland structure: dead wood	m <sup>3</sup> per hectare; number per hectare	At least 30m <sup>3</sup> /ha of fallen timber greater than 10cm diameter; 30 snags/ha; both categories should include stems greater than 40cm diameter
Woodland structure: veteran trees	Number per hectare	No decline
Woodland structure: indicators of local distinctiveness	Occurrence	No decline
Vegetation composition: native tree cover	Percentage	No decline. Native tree cover not less than 95%
Vegetation composition: typical species	Occurrence	A variety of typical native species present, depending on woodland type, including oak ( <i>Quercus petraea</i> ) and birch ( <i>Betula pubescens</i> )
Vegetation composition: negative indicator species	Occurrence	Negative indicator species, particularly non-native invasive species, absent or under control
[91E0] Alluvial Forests		
Habitat area	Hectares	Area stable or increasing, subject to natural processes, at least 181.54ha for sites surveyed



Attribute	Measure	Target
Habitat distribution	Occurrence	No decline.
Woodland size	Hectares	Area stable or increasing. Where topographically possible, "large" woods at least 25ha in size and "small" woods at least 3ha in size
Woodland structure: cover and height	Percentage and metres	Diverse structure with a relatively closed canopy containing mature trees; subcanopy layer with semi- mature trees and shrubs; and well-developed herb layer
Woodland structure: community diversity and extent	Hectares	Maintain diversity and extent of community types
Woodland structure: natural regeneration	Seedling;sapling;pole ratio	Seedlings, saplings and pole age-classes occur in adequate proportions to ensure survival of woodland canopy
Hydrological regime: Flooding depth/height of water table	Metres	Appropriate hydrological regime necessary for maintenance of alluvial vegetation
Woodland structure: dead wood	m <sup>3</sup> per hectare; number per hectare	At least 30m <sup>3</sup> /ha of fallen timber greater than 10cm diameter; 30 snags/ha; both categories should include stems greater than 40cm diameter (greater than 20cm diameter in the case of alder)
Woodland structure: veteran trees	Number per hectare	No decline
Woodland structure: indicators of local distinctiveness	Occurrence	No decline
Vegetation composition: native tree cover	Percentage	No decline. Native tree cover not less than 95%



Attribute	Measure	Target
Vegetation composition: typical species	Occurrence	A variety of typical native species present, depending on woodland type, including ash ( <i>Fraxinus excelsior</i> ) alder ( <i>Alnus glutinosa</i> ), willows ( <i>Salix</i> spp) and locally, oak ( <i>Quercus robur</i> )
Vegetation composition: negative indicator species	Occurrence	Negative indicator species, particularly non-native invasive species, absent or under control
[1016] Desmoulin's Whorl Snail		
Distribution: occupied sites	Number	No decline. Two known sites: Borris Bridge, Co. Carlow S711503; Boston Bridge, Kilnaseer S338774, Co. Laois.
Population size: adults	Number per positive sample	At least 5 adults snails in at least 50% of samples
Population density	Percentage positive samples	Adult snails present in at least 60% of samples per site
Area of occupancy	Hectares	Minimum of 1ha of suitable habitat per site
Habitat quality: vegetation	Percentage of samples with suitable vegetation	90% of samples in habitat classes I and II
Habitat quality: soil moisture levels	Percentage of samples with appropriate soil moisture levels	90% of samples in moisture class 3-4
[1029] Freshwater Pearl Mussel		
The status of the FPM as a qualifying Annex II species for the River Barrow and River Nore SAC is currently under review		
[1092] White-clawed Crayfish		
Distribution	Occurrence	No reduction from baseline
Population structure: recruitment	% occurrence of juveniles and females with eggs	Juveniles and/or females with eggs in at least 50% of positive samples
Negative indicator species	Occurrence	No alien crayfish species



Attribute	Measure	Target
Disease	Occurrence	No instances of disease
Water quality	EPA Q value	At least Q3-4 at all sites sampled by EPA
Habitat quality: heterogeneity	Occurrence of positive habitat features	No decline in heterogeneity or habitat quality
[1095] Sea Lamprey		
Distribution: extent of anadromy	% of river accessible	Greater than 75% of main stem length of rivers accessible from estuary
Population structure of juveniles	Number of age/size groups	At least three age/size groups present
Juvenile density in fine sediment	Juveniles/m <sup>2</sup>	Juvenile density at least 1/m <sup>2</sup>
Extent and distribution of spawning habitat	m <sup>2</sup> and occurrence	No decline in extent and distribution of spawning beds
Availability of juvenile habitat	Number of positive sites in 3rd order channels (and greater), downstream of spawning areas	More than 50% of sample sites positive
[1096] Brook Lamprey		
Distribution	% of river accessible	Access to all water courses down to first order streams
Population structure of juveniles	Number of age/size groups	At least three age/size groups of brook/river lamprey present
Juvenile density in fine sediment	Juveniles/m <sup>2</sup>	Mean catchment juvenile density of brook/river lamprey at least 2/m <sup>2</sup>
Extent and distribution of spawning habitat	m <sup>2</sup> and occurrence	No decline in extent and distribution of spawning beds



Attribute	Measure	Target
Availability of juvenile habitat	Number of positive sites in 2nd order channels (and greater), downstream of spawning areas	More than 50% of sample sites positive
[1099] River Lamprey		
Distribution: extent of anadromy	% of river accessible	Greater than 75% of main stem and major tributaries down to second order accessible from estuary
Population structure of juveniles	Number of age/size groups	At least three age/size groups of river/brook lamprey present
Juvenile density in fine sediment	Juveniles/m <sup>2</sup>	Mean catchment juvenile density of brook/river lamprey at least 2/m <sup>2</sup>
Extent and distribution of spawning habitat	m <sup>2</sup> and occurrence	No decline in extent and distribution of spawning beds
Availability of juvenile habitat	Number of positive sites in 2nd order channels (and greater), downstream of spawning areas	More than 50% of sample sites positive
[1103] Twaite Shad		
Distribution: extent of anadromy	% of river accessible	Greater than 75% of main stem length of rivers accessible from estuary
Population structure- age classes	Number of age classes	More than one age class present
Extent and distribution of spawning habitat	m <sup>2</sup> and occurrence	No decline in extent and distribution of spawning habitats
Water quality- oxygen levels	Milligrammes per litre	No lower than 5mg/l



Attribute	Measure	Target
Spawning habitat quality: Filamentous algae; macrophytes; sediment	Occurrence	Maintain stable gravel substrate with very little fine material, free of filamentous algal (macroalgae) growth and macrophyte (rooted higher plants) growth
[1106] Atlantic Salmon		
Distribution: extent of anadromy	% of river accessible	100% of river channels down to second order accessible from estuary
Adult spawning fish	Number	Conservation Limit (CL) for each system consistently exceeded
Salmon fry abundance	Number of fry/5 minutes electrofishing	Maintain or exceed 0+ fry mean catchment-wide abundance threshold value. Currently set at 17 salmon fry/5 min sampling
Out-migrating smolt abundance	Number	No significant decline
Number and distribution of redds	Number and occurrence	No decline in number and distribution of spawning redds due to anthropogenic causes
Water quality	EPA Q value	At least Q4 at all sites sampled by EPA
[1355] Otter		
Distribution	% positive survey sites	No significant decline
Extent of terrestrial habitat	Hectares	No significant decline. Area mapped and calculated as 122.8ha above high water mark (HWM); 1136.0ha along riverbanks / around ponds
Extent of marine habitat	Hectares	No significant decline. Area mapped and calculated as 857.7ha
Extent of freshwater (river) habitat	Kilometres	No significant decline. Length mapped and calculated as 616.6km



Attribute	Measure	Target
Extent of freshwater (lake) habitat	Hectares	No significant decline. Area mapped and calculated as 2.6ha
Couching sites and holts	Number	No significant decline
Fish biomass available	Kilograms	No significant decline
[1421] Killarney Fern		
Distribution	Location	No decline. Three locations known, with three colonies of gametophyte and one sporophyte colony
Population size	Number	Maintain at least three colonies of gametophyte, and at least one sporophyte colony of over 35 fronds
Population structure: juvenile fronds	Occurrence	At least one of the locations to have a population structure comprising sporophyte, unfurling fronds, 'juvenile' sporophyte and gametophyte generations
Habitat extent	m <sup>2</sup>	No loss of suitable habitat, such as shaded rock crevices, caves or gullies in or near to, known colonies. No loss of woodland canopy at or near to known locations
Hydrological conditions: visible water	Occurrence	Maintain hydrological conditions at the locations so that all colonies are in dripping or damp seeping habitats, and water is visible at all locations
Hydrological conditions: humidity	Number of dessicated fronds	No increase. Presence of dessicated sporophyte fronds or gametophyte mats indicates conditions are unsuitable
Light levels: shading	Percentage	No changes due to anthropogenic impacts
Invasive species	Occurrence	Absent or under control
[1990] Nore Freshwater Pearl Mussel		



Attribute	Measure	Target
Distribution	Kilometres	Maintain at 15.5km.
Population size: adult mussels	Number	Restore to 5,000 adult mussels
Population structure: recruitment	Percentage per size class	Restore to at least 20% of population no more than 65mm in length; and at least 5% of population no more than 30mm in length
Population structure: adult mortality	Percentage	No more than 5% decline from previous number of live adults counted; dead shells less than 1% of the adult population and scattered in distribution
Habitat extent	Kilometres	Restore suitable habitat in length of river corresponding to distribution target (15.5km) and any additional stretches necessary for salmonid spawning
Water quality: Macroinvertebrates and phytobenthos (diatoms)	Ecological quality ratio (EQR)	Restore water quality- macroinvertebrates: EQR greater than 0.90; phytobenthos: EQR greater than 0.93
Substratum quality: Filamentous algae (macroalgae), macrophytes (rooted higher plants)	Percentage	Restore substratum quality- filamentous algae: absent or trace (<5%)
Substratum quality: sediment	Occurrence	Restore substratum quality- stable cobble and gravel substrate with very little fine material; no artificially elevated levels of fine sediment
Substratum quality: oxygen availability	Redox potential	Restore to no more than 20% decline from water column to 5cm depth in substrate
Hydrological regime: flow variability	Metres per second	Restore appropriate hydrological regimes



Attribute	Measure	Target
Host fish	Number	Maintain sufficient juvenile salmonids to host glochidial larvae
[A229] Kingfisher <i>Alcedo atthis</i>		
<p>Only generic conservation objectives are published for Kingfisher in the River Nore SPA. The favourable conservation status of a species is achieved when:-</p> <ul style="list-style-type: none"> <li>• population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;</li> <li>• the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and,</li> <li>• there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.</li> </ul>		

**Table A1: Conservation Objectives of the River Barrow & River Nore SAC and the River Nore SPA**



**Annex 2 –  
Environmental Impact Assessment Report Biodiversity Chapter**



**Annex 3 -  
Planning-Stage Construction & Environmental Management Plan  
(incl. Surface Water Management Plan)**





White Hill Wind Farm

# Environmental Impact Assessment Report

## Chapter 5: Biodiversity

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## 5.1 Introduction

### 5.1.1 Background and Objectives

Ecology Ireland Wildlife Consultants Ltd. was commissioned to undertake an ecological impact assessment of the proposed development to inform this Biodiversity chapter. This chapter assesses all aspects of ecology including ornithology.

This chapter provides an assessment of the likely and significant effects of the White Hill Wind Farm located in west County Carlow and east County Kilkenny and its associated ancillary developments on biodiversity and the ecology of the receiving environment.

The objectives of the assessment are to:-

- Produce a baseline study of the existing ecological environment in the vicinity of the proposed development;
- Identify likely positive and negative effects of the proposed development on biodiversity during the construction, operational and decommissioning phases of the development;
- Identify mitigation measures to avoid, remediate or reduce likely or significant negative effects; and,
- Assess likely or significant cumulative effects of the proposed development as a result of other developments.

### 5.1.2 Description of the Project

In summary, the project comprises the following main components as described in **Chapter 3**:-

- 7 no. wind turbines with an overall tip height of 185m, and all associated ancillary infrastructure;
- All associated and ancillary site development, excavation, construction, landscaping and reinstatement works, including the provision of site drainage infrastructure;
- Upgrades to the turbine component haul route; and,
- Construction of an electricity substation and installation of c. 15km of underground grid connection cable between the White Hill Wind Farm and the existing Kilkenny 110kV electricity substation.

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 majority, c. 14km, of the underground electricity line is located in Co. Kilkenny. Off-site and secondary developments; including the forestry replant lands and candidate quarries which may supply construction materials; also form part of the project.

The turbine component haul route and associated upgrade works as described in **Chapter 3**. It is envisaged that the turbines will be transported from the Port of Waterford, through the counties of Kilkenny, Waterford, Carlow and Kildare to the project site. However, as the route follows motorway and national roads through counties Waterford and Kildare, it is assessed that there is no likelihood of effects on population & human health and, therefore, these areas have been screened out from further assessment.

A full description of the project is presented in **Chapter 3**.

### 5.1.3 Statement of Authority

Ecology Ireland Wildlife Consultants Ltd. (Ecology Ireland) is a leading independent ecological consultancy. The company was established by Dr. Gavin Fennessy in 2011 and has provided ecological advice, monitoring and reporting services to a large number of clients in the public and private sectors. Ecology Ireland and its key associates are highly experienced in the delivery of ecological impact assessments and have been involved in the successful delivery of planning permission for a number of the largest renewable energy and infrastructure projects in Ireland.

The following headings highlight a number of key project team members.

#### Dr. Gavin Fennessy

Dr. Gavin Fennessy (BSc PhD MCIEEM) is the Director & Principal Ecologist of Ecology Ireland Wildlife Consultants and a consultant ecologist with over 20-years of experience in environmental consultancy. Dr. Fennessy has contributed to and project managed numerous ecological impact assessment projects including EclA, EIA, AA, SEA etc. Gavin is also an experienced expert witness having presented expert testimony at several An Bord Pleanála oral hearings. He has regularly contributed to B.Sc. Env. Sc. courses at UCC. Dr. Fennessy is an expert in wildlife hazard and collision risk and is the retained wildlife management expert of Dublin Airport Authority (2019 to present). Dr. Fennessy led the ecological impact assessment and associated ecology team on this project.

#### Tom O'Donnell

Tom O'Donnell is a Chartered Environmentalist and a full member of the Chartered Institute of Ecology and Environmental Management. He was awarded a BSc in Environmental and Earth System Science [Applied Ecology] from UCC in 2007 and an MSc in Ecological Assessment in 2009, both from UCC. He has gained significant experience in ecological assessment and environmental management over the last 13-years of professional employment. Tom has particular experience in terrestrial mammals surveys, bat surveys and conservation and bat call sonogram analysis using Kaleidoscope Pro. Tom led the mammal surveys of this project.

#### Rory Dalton

Rory Dalton (BSc) is a specialist aquatic ecologist with over 10-years of experience in consultancy. Rory is particularly skilled in riparian habitat and river morphology assessments and he has carried out full catchment level assessments of Otters and their prey. He has carried out numerous aquatic ecology surveys and is experienced in a wide range of specialist field techniques. He has experience in surveying fish and aquatic invertebrates as well as Otter and other mustelid species. Rory carried out the aquatic ecology assessment of this project.

#### Claire Deasy

Claire Deasy is an ecologist with almost 20-years of experience in ecological assessment. Her primary skills are in project management, surveying, data analysis and report writing. She has project managed numerous impact assessment projects with a particular focus on the ecological impacts of renewable energy projects (wind farms, solar, battery storage). Claire has wide range of ecological survey skills with particular expertise in botanical and habitat surveys. Claire has also contributed to the design and implementation of Habitat & Species Management Plans for EU protected species such as the Annex I Hen Harrier and Annex II Marsh Fritillary Butterfly. Claire undertook the habitat and botanical assessment of this project.

### John Deasy

John is an independent ecological consultant with experience across a range of ecological disciplines including botanical and habitat surveys, bird surveys, mammal surveys and protected invertebrate surveys. He has almost 10-years of experience as a professional ecologist and has undertaken a range of botanical and habitat surveys including baseline surveys for renewable energy projects, shared-use greenways and domestic and commercial properties. These surveys have included non-native invasive species surveys, rare species surveys and evaluations of habitats listed on Annex I of the EU Habitats Directive. John holds a MSc. in Ecological Assessment and BSc. in Earth and Environmental Science from University College Cork and is a member of the Botanical Society of Britain and Ireland. John carried out various field surveys and contributed to the impact assessment of this project.

### Michelle O'Neill

Michelle has over 12-years of experience working as an ecological consultant within the public and private sector on projects that include habitat and botanical surveys, breeding and winter bird surveys, mammal surveys, data analysis, assessment and report writing. She has a B.Sc. in Ecology and Diploma in Field Ecology. She also holds an NCVA in Computer Graphics. To date, she has completed habitat and botanical surveys for a range of projects as part of National Surveys, Ecological Monitoring, Ecological Impacts Assessments (EclA/EIAR) and Appropriate Assessment (AA/NIS). She has a particular interest in botany and habitats and has worked on an Irish semi-natural grassland survey (2009-2012) and a habitat mapping project for the provision of a Teagasc pilot methodology for farmland habitat assessment of sustainability scheme. Michelle assisted in carrying out the botanical and habitat surveys of the project.

The avian field survey team was comprised of experienced ornithologists including Dr. Fennessy, Dr. Allan Mee, Mark Shorten, Aidan Duggan, Noel Lenihan, Luise Ní Dhonnabháin, Paul Troake, Barry O'Mahony, John Deasy, Paul Rowe, Éinne O'Cathasaigh, Gerard McGrath and Dr. Olivia Crowe.

An overview of survey effort is provided at **Annex 5.1** and surveys can be traced to surveyors by their initials.

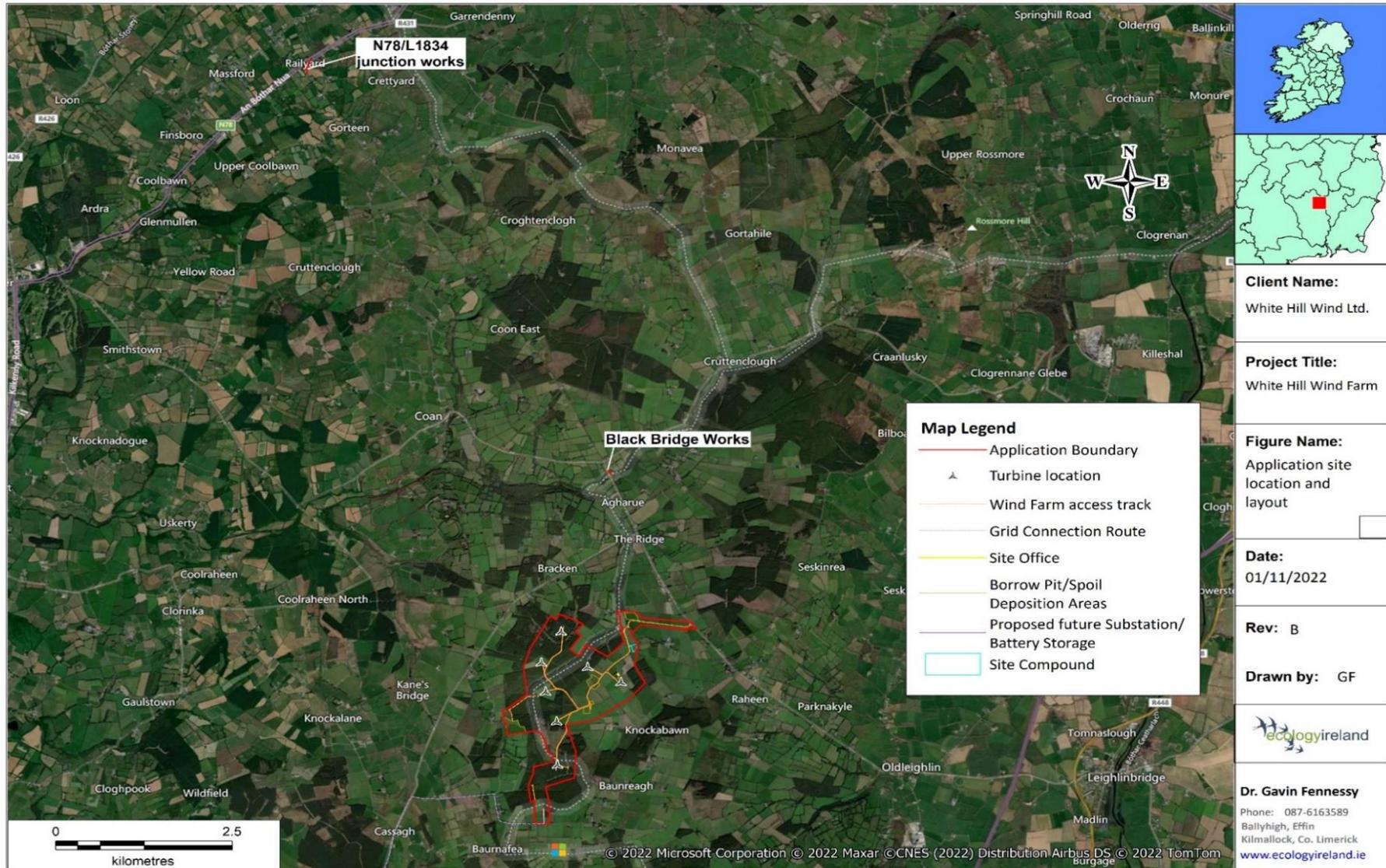


Figure 5.1: Location of Wind Farm Site

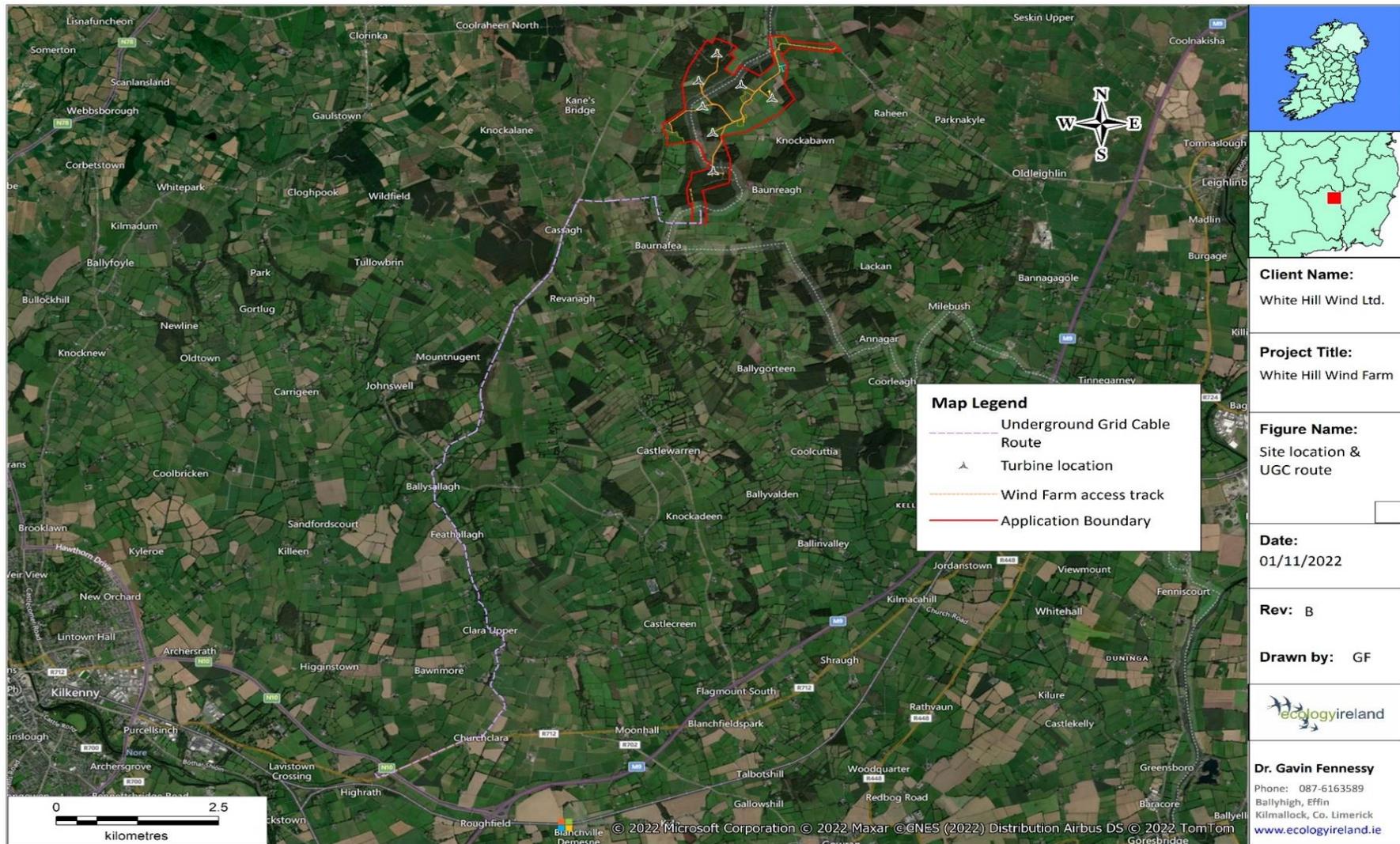


Figure 5.2: Wind Farm Location and Grid Connection Route

## 5.2 Methodology

The methodology utilised to inform this assessment comprised field assessments and desktop review, which are described in the relevant sections below, taking due regard of guidelines relating to ecological assessments (e.g. EPA 2022, CIEEM 2018, 2019 & 2021). Surveys of the wind farm site, turbine component haul route, grid connection route and replant lands were carried out using established survey methodologies and according to current guidance documents.

The surveys and assessments have had due regard to national and local policies and the current conservation status of habitats and species recorded or likely to occur in the receiving environment.

### 5.2.1 Relevant Legislation & Guidelines

Guidelines relevant to the biodiversity assessment (surveys and assessments) are outlined in the corresponding sections below. Many of the key guidance documents are summarised in the Chartered Institute for Ecology and Environmental Management *Good Practice Guidelines for Habitats and Species* (CIEEM 2021). The *Guidelines on the information to be contained in Environmental Impact Assessment Reports* (EPA 2022) was also a key reference document in the preparation of this chapter.

### 5.2.2 Scoping & Consultation

As part of the early-stage environmental constraints analysis and scoping process undertaken to inform this assessment, a range of stakeholders relevant to biodiversity were consulted with. A list of all consultees is provided at **Table 1.3 (Chapter 1)**; while all responses received are provided at **Annex 1.8 (Volume II)**.

The consultation responses that provided dedicated comment in relation to biodiversity related issues included the correspondence with Carlow County Council, the Department of Agriculture, Food and the Marine and Kilkenny County Council. All matters raised were taken into account in the scoping of this chapter.

### 5.2.3 Designated Nature Conservation Sites

Designated nature conservation sites in the vicinity of the wind farm, including the wind turbines and associated infrastructure, as well as along the grid connection route and turbine component haul route were identified and considered as part of the ecological assessment. Geographical Information Systems (GIS) software was used to map and measure the distance from the application site boundary to nationally and European designated conservation sites.

The potential for likely significant effects on European designated Natura 2000 sites arising from the proposed project is fully assessed in the Appropriate Assessment Screening Report which is included with the Natura Impact Statement (NIS). The Screening Report identified that 2 no. Natura 2000 sites could be affected by the construction, operation or decommissioning of the project in the absence of mitigation measures. The NIS assesses whether the project could, on its own or in combination with other plans or projects, adversely affect the integrity of any of these Natura 2000 sites, with reference to their Conservation Objectives.

### 5.2.4 Field Assessment & Desktop Studies

Biodiversity field surveys were undertaken from 2019 to 2022 inclusive, with detailed survey schedules are available at **Annex 5.1**. A general biodiversity study area was implemented to encompass the extent of the wind farm site as illustrated at **Figure**

**5.3.** For certain surveys, including those along the grid connection route and turbine component haul route, ecological data (both desktop and field studies) was collected beyond this study area.

A desktop review of ecological data available for the study area was undertaken by consulting online databases to identify species of interest (e.g. rare, protected) previously recorded within the relevant national grid squares that overlap the study area; in this case a review was primarily undertaken of the S66 10km national grid square from the National Biodiversity Data Centre (NBDC) online database. The application boundary is encompassed in four 2km Grid Squares S66D, S66I, S66C and S57T and the biodiversity data available for these grid squares was fully interrogated. The grid connection route follows the road network and is contained in three 10km Grid Squares S66, S55 and S56. The data pertaining to those grid squares was also collated as part of this assessment.

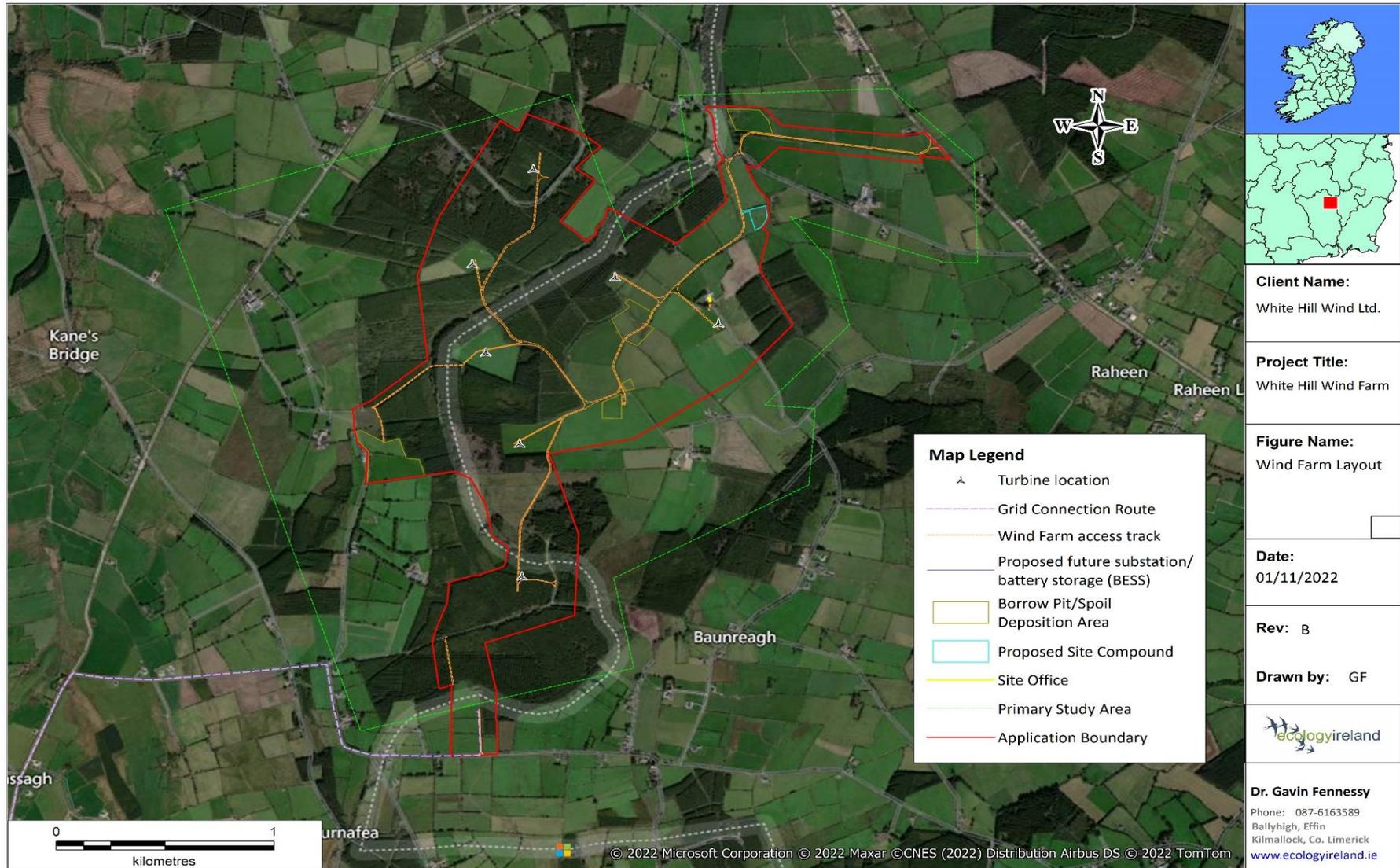


Figure 5.3: Wind Farm Layout with Study Area

### 5.2.4.1 Habitats and Flora

The habitat and flora survey involved undertaking a desktop review and a baseline field assessment of the habitats and flora within the study area. As part of the desktop study, a review of botanical data available for the project site was carried out to identify botanical species of conservation interest (e.g. rare, legally protected) and invasive species previously recorded within the relevant national grid squares that overlap the study site. In this case, a review was undertaken of the 10km grid square S66 and 2km grid squares which overlap the wind farm and grid connection route (S66C, S66I, S66D, S56U, S56W, S56X, S55R, S56T, S56U from the NBDC and BSBI online databases. The habitat and flora field assessment was carried out in accordance with best practice guidance (Smith *et al.* 2011). This involved a walkover of the study area where the dominant habitats present were mapped and classified according to Fossitt (2000) and where botanical species were identified and recorded according to dominant habitat type. The extents of habitats were recorded on a field map along with notes of the botanical species present and their relative abundance described using the DAFOR scale. In addition, observations of interest (e.g. invasive plant species, rare plants etc.) were recorded using GPS. The baseline walkover was undertaken between August and September 2021 within the general optimum botanical survey season when most plant species are growing (i.e. April to September inclusive; Smith *et al.* 2011). A survey of the western spoil deposition area was undertaken in June 2022.

Evaluation of the habitats present in terms of their biodiversity value was assessed using criteria amended after NRA 2009 and Nairn & Fossitt 2004 (see **Annex 5.2**). The correspondence of any habitats within the study area to those listed on Annex I of the EU Habitats Directive 92/43/EC was evaluated with reference to the European Commission (2013) and the National Parks & Wildlife Service (NPWS; 2013). The conservation status of habitats and flora was also considered in respect of the following: Irish Red List for Vascular Plants (Wyse Jackson *et al.* 2016); Irish Red List for Bryophytes (Lockhart *et al.* 2012), Flora Protection Order (1999 as amended 2015 & 2022); the EU Habitats Directive (92/43/EEC).

The haul route works locations were visited (August/September 2021 and August 2022) to record the presence/absence of any Third Schedule Invasive Plant species and any rare or protected plant species or protected or sensitive habitats. The grid connection route was driven (August/September 2021 and August 2022) to record the presence/absence of any Third Schedule Invasive Plant species at the road margin.

#### Habitats & Flora Desk Study

A desktop review was undertaken to collate and review available information, datasets and documentation sources pertaining to the flora and habitats of the study area. Records and information available from the following sources were reviewed:-

- National Biodiversity Data Centre (NBDC)<sup>1</sup>;
- Botanical Society of Britain and Ireland (BSBI) dataset and distribution maps<sup>2</sup>;
- NPWS Flora Protection Order (FPO) Bryophytes database;
- NPWS Article 17 Metadata and GIS Database Files
- Environmental Protection Agency (EPA) Rivers and Lakes dataset;

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<sup>1</sup> NBDC database accessed 27/05/2021 & 06/11/2022

<sup>2</sup> BSBI data accessed 27/05/2021 & 06/11/2022

- Ancient and Long-established Woodland Inventory 2010 dataset;
- National Forestry Inventory and Planning System (FIPS, 1998);
- CORINE Landcover mapping layer (2012);
- OSI mapping - Discovery series at 1:50,000 scale; 6inch and 25inch historical mapping as available on Geohive OSI Mapviewer;
- Aerial Imagery- Google Earth, Bing;
- Geological Survey Ireland Mapviewer; and,
- Teagasc/EPA Soil Information System (SIS)Mapviewer

According to the GSI and EPA Mapviewers, the underlying bedrock is that of Westphalian shales and sandstones consisting of the Coolbaun Formation and the Swan Sandstone Member. A full description of the soil and underlying formations is provided at **Chapter 6** (Land & Soils).

### Habitats

A review was undertaken of NPWS Article 17 datasets and other available datasets and reports to establish if there were existing records for any EU Annex I protected habitats or other ecologically sensitive habitats present within the proposed development site. The following datasets were consulted:-

- Article 17 datasets for Annex I habitats;
- Ancient and Long-established Woodland dataset (Perrin *et al.*, 2010);
- National Survey of Native Woodlands (Perrin *et al.*, 2008); and,
- Irish Semi-Natural Grassland Survey 2007-2012 (O'Neill *et al.*, 2013).

The National Survey of native woodland 2003-2008 dataset (Perrin *et al.*, 2008) did not record any native woodland within or adjacent to the study area. A review of the Ancient and Long-established Woodland Inventory (Perrin *et al.*, 2010) found that there are no ancient or long-established woodlands within or adjacent to the project site. According to the Ancient and Long-established Woodland Inventory (2010), ancient woodland is defined as woodland stands which have been continuously wooded since 1660 and long-established woodland is defined as having been continuously wooded since 1830. The National Semi-natural grassland Survey dataset does not hold records for any semi-natural grassland habitats within or adjacent to the project site. According to the Article 17 Annex I Habitat mapping datasets, the study area does not contain or lie adjacent to any known Annex I habitat.

Historical aerial imagery and OSI historical mapping were also examined for evidence of land-use and semi-natural habitat types present within the study area in the past to provide information about potential remnant habitats onsite such as old woodland and wetlands. From a review of the historical aerial imagery (1995-2020) and historical OSI 6 inch and 25 Inch mapping dating back to the 1830's/1840's to 1913, the habitats within the project site have largely consisted of grassland field systems and hedgerows.

#### 5.2.4.2 Birds

During scoping of the ornithological field surveys, it was recognised that the habitats present may support species for which additional specialist survey effort might be required. Based on the habitats present and the knowledge of the ornithological team, there was no likelihood of species such as breeding Red Grouse, *Lagopus lagopus hibernicus*, or breeding waders such as Lapwing, *Vanellus vanellus* to occur within the study area. Similarly, there are no recorded wintering roosts of Hen Harrier in the area (O'Donoghue, 2021). The lands within and surrounding the project site are dominated by improved agricultural grassland and commercial conifer plantation.

There are no lakes or waterbodies of size in the immediate hinterland of the wind farm site.

The wind farm site is also relatively distant from any designated Special Protection Areas (SPA) for birds. The closest of these, the River Nore SPA (004233) being located 13km from the nearest wind turbine, is designated for the protection of Kingfisher, *Alcedo atthis*. The next closest SPA is located c. 40km from the nearest wind turbine.

Avian field surveys at the site comprised multi-season vantage point surveys at the wind farm, breeding and winter season transect and point count surveys at the wind farm, and walked and driven surveys along the grid connection route. Survey design and extent was based on the professional knowledge of the project team and refined through the scoping and consultation process and with reference to a review of desktop information. Detailed survey methodologies are provided below.

In addition to the field surveys, a desktop study was also undertaken by consulting the National Biodiversity Data Centre (NBDC) online mapping database<sup>3</sup> to identify additional avian species historically recorded within the relevant national grid squares overlapping the biodiversity study area.

The conservation status of bird species was considered in respect of the Irish Wildlife Acts (1976 – 2012 as amended); Birds of Conservation Concern in Ireland (BoCCI) Red, Amber and Green lists (see Gilbert *et al.* 2021); and EU Birds Directive (2009/147/EC) Annex I list.

### Vantage Point Survey

Standard vantage point (VP) field surveys were undertaken with due regard to NPWS VP methodology recommendations and guidance by Scottish Natural Heritage (SNH 2017). SNH 2017 guidelines recommend that breeding/winter season surveys for target bird species be completed as part of assessments of proposed wind farm sites, with typically 6-hours of coverage per month from each VP location per season, resulting in 36-hours of survey effort per VP in each survey season (SNH 2017). Vantage Point locations are illustrated at **Figure 5.4**.

Target species included raptors, waterbirds and waders.

Detailed flight line mapping was carried out for high conservation value species, such as Hen Harrier and any other Annex I species such as Peregrine Falcon *Falco peregrinus* and Golden Plover *Pluvialis apricaria*. A total of 6 no. vantage point locations were used for the VP surveys completed at the site between Autumn 2019 and Spring 2022. The VP surveys are outlined as follows (see **Annex 5.1** for survey schedules):-

- Summer/Breeding Season VP Surveys (March to August inclusive);
  - Summer 2020 (6 no. VPs, 36-hours survey effort);
  - Summer 2021 (6 no. VPs, 36-hours survey effort);
- Winter Season VP Surveys (October to March inclusive);
  - Winter 2019/2020 (6 no. VPs, 36-hours survey effort);
  - Winter 2020/2021 (6 no. VPs, 36-hours survey effort); and,
  - Winter 2021/2022 (6 no. VPs, 36-hours survey effort).

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<sup>3</sup> <https://maps.biodiversityireland.ie/Map>

All bird species heard or seen during the VP watches were noted. Detailed field records were taken of target species (heard or seen) with as much of the following information recorded as possible:-

- Species and estimated number;
- Time first observed;
- Duration of observation;
- Estimated time on-site;
- Estimated time off-site (note that detailed records were made in relation to the study area so the time spend within/outside the wind farm site is estimated from the flight line and associated description);
- Flight-line drawn on a field map and numbered to link with associated field notes;
- Estimated flight height. Initial height estimate and any marked change noted during period of observation: <5m AGL (Close to ground) 5-25m AGL (Low Flight) 25-100m AGL (Medium Flight height) 0>100m AGL (High Flight Height); and,
- Any other observations of note (e.g. behaviour, association or interaction with other species, etc.).

Field surveys were undertaken using appropriate survey equipment as required (e.g. GPS units, binoculars, scope, notebooks, etc.) and during suitable weather conditions. All field observers communicated with two-way radios/mobile phones to allow co-ordination in the event that a noteworthy (i.e. Annex I) species was observed at or close to the site.

Dr. Gavin Fennessy has carried out Post-Doctoral research on collision risk and aircraft and has presented papers at a number of international conferences on wildlife hazard. He is critical of the reliance of Collision Risk Modelling (CRM), as set out in the SNH (2017) guidance, which is prevalent in the United Kingdom. The 'Band' model which is widely used in avian collision risk assessments for wind farms is not evidence based and the driver of the model ('avoidance rate') is generally derived without any observational data. The weaknesses inherent on a reliance on CRM are recognised (e.g. Madsen & Cook 2016) but the methodology is still widely used, albeit less so in Ireland than in the UK. Consequently, this assessment describes the occurrence and flight behaviour of the birds recorded at the wind farm site with a knowledge of the ecology and behaviour of the species.

Data are presented in this report as flightline observation tables with corresponding flightline maps. In addition, the proportion of time spent by target bird species on and off the site during the survey is calculated.

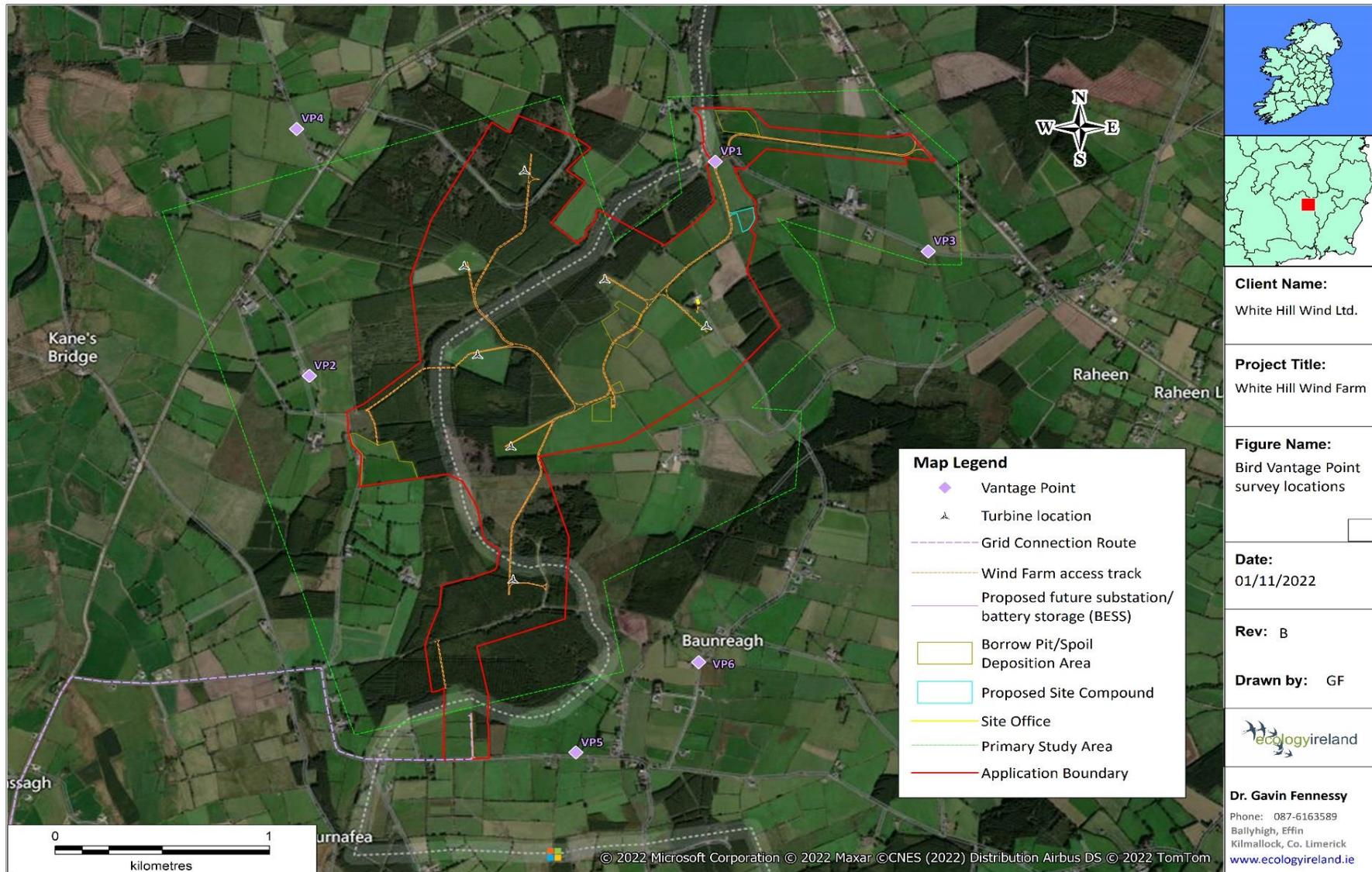


Figure 5.4: Location of Bird Survey Vantage Points (VPs)

### General Bird Transect/Point Count Surveys

Standard general breeding and winter season bird transect and point count surveys (Bibby *et al.* 2000) were undertaken at the biodiversity study area as follows (**Figure 5.5**; with a total of 6 no. transects and 10 no. point counts used).

- Summer/Breeding Season General Bird Surveys (Early and Late Season);
  - Summer 2020 (6 no. transects, 10 no. point counts);
  - Summer 2021 (6 no. transects, 10 no. point counts);
- Winter Season General Bird Surveys;
  - Winter 2019/2020 (6 no. transects, 10 no. point counts);
  - Winter 2020/2021 (6 no. transects, 10 no. point counts); and,
  - Winter 2021/2022 (6 no. transects, 10 no. point counts).

Transects were c. 1km in length and located in open habitats, or existing tracks, while point-counts were of 5-minute duration and were located in closed/forestry habitats. These were established throughout the study area to survey the baseline general bird assemblage in the study area. The transects/point counts were surveyed on 2 no. occasions per breeding season (i.e. early and late periods of the nesting season) and on 2 no. occasions in each wintering season.

At each transect, all bird species encountered (seen or heard) within 100m of the observer were recorded and their abundance noted. Birds heard and seen during each point count were recorded, with the number of each species noted within 25m of the observer and beyond 25m from the observer.

Bird species occurring more than 100m from the observer during the survey transects or noted when walking between transects/point counts, or casually noted during other aspects of the biodiversity field study (e.g. VP surveys), were considered as 'additional' species for subsequent consideration. This approach allowed a comprehensive taxa list of the birds present at/near the study area to be generated.

### Grid Connection Route Surveys

The route of the grid connection was driven on 2 no. occasions in each winter and breeding season with observations made of any bird species of interest in adjacent areas. Locations along the route which afforded views of the surrounding land were utilised to scan for species of interest. A casual record was kept of all birds seen or heard during these survey visits.



Figure 5.5: Bird Survey Transects and Point Counts.

### 5.2.4.3 Non-Volant Mammals

Non-volant mammal field surveys at the study area comprised walkovers and deployment of multiple wildlife trail cameras that were supplemented by casual records made in the course of other terrestrial field surveys (e.g. night-time bat surveys, VP surveys, etc.). Details of the dedicated schedule and trail camera deployment dates are provided at **Annex 5.1**, with trail camera locations shown at **Figure 5.6**.

A desktop study of non-volant mammal data was also undertaken by consulting the NBDC online mapping database to identify species historically recorded within the relevant national grid square(s) overlapping the biodiversity study area and grid connection route.

#### Walkover Surveys

Walkover surveys were carried out to search for any evidence of non-volant mammals and particularly the resting places of these species (e.g. badger setts). During surveys, the footprint of the project was surveyed for signs of mammal activity. Surveys were undertaken in accordance with the National Roads Authority (NRA) (2009) *Ecological Surveying Techniques for Protected Flora and Fauna During the Planning of National Road Schemes* and the Joint Nature Conservation Committee (JNCC) (2004) *Common Standards Monitoring Guidance for Mammals*.

Dedicated mammal walkover surveys were carried out on 21 December 2021, 10 February 2022, 6 April 2022 and 1 June 2022. Any casual mammal sightings or signs observed during the course of other ecological surveys were also recorded.

During the walkovers, all sightings and signs of mammal species or signs of mammal activity (e.g. droppings, tracks, burrows, setts, holts etc.) were recorded using field notes and/or hand-held GPS units. Techniques used to identify mammal activity followed recognised guidelines (e.g. Clark 1988, Sutherland 1996, Bang & Dahlstrom 2004 and JNCC 2004).

The conservation status of mammal species was considered. The conservation status of mammals within Ireland and Europe is indicated by inclusion in one or more of the following: Irish Wildlife Acts (1976 - 2012); Red List of Terrestrial Mammals (Marnell et al. 2019); EU Habitats Directive. The evaluation of the site for mammals followed the criteria presented in Nairn & Fossitt (see **Annex 5.2**).

#### Wildlife Trail Cameras

Trail cameras were deployed at suitable locations on and adjacent to the wind farm site for longer term monitoring. These infra-red cameras take photographs and/or video when triggered by heat or motion and were deployed to record mammal activity within the study area.

In total, 5 no. trail cameras were erected at various dates between July 2021 and April 2022. The locations of trail camera deployment sites are illustrated at **Figure 5.6**. A trail camera was located at a Badger sett from 22 December 2021 to 4 April 2022, and the location is not disclosed in this report.

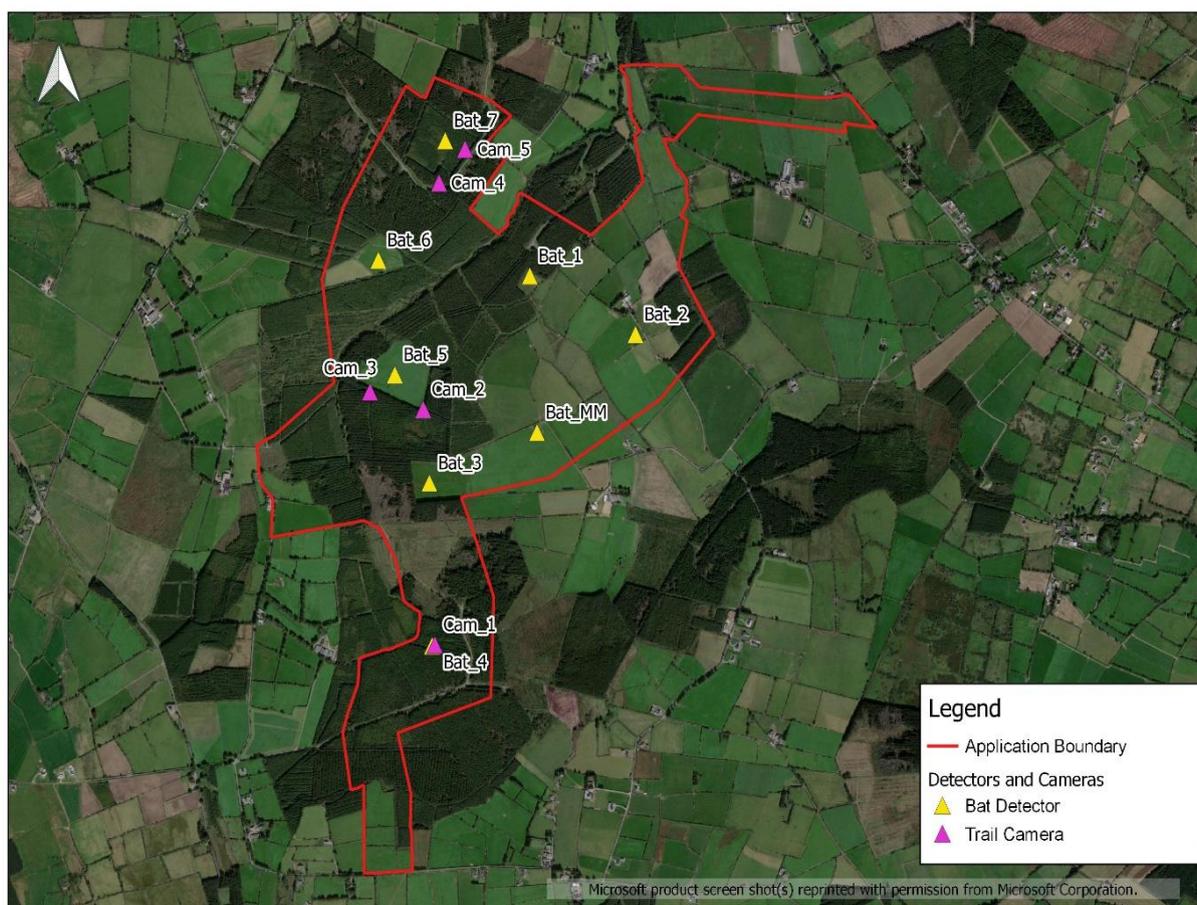
### 5.2.4.4 Bat Surveys

Bat surveys were carried out using a combination of daytime building and habitat suitability assessments and both active and passive bat detector surveys. Passive

detectors were deployed in the area from Spring 2021 up to Autumn 2021 (**Figure 5.6 & Figure 5.7**).

Bat field surveys comprised active detector surveys and a passive detector study taking due regard to guidance from SNH (2019; subsequently revised as NatureScot 2021). Survey methodologies are described below. The conservation status of bats was considered in respect of the Irish Wildlife Acts (1976 - 2012 as amended); Red List of Terrestrial Mammals (Marnell *et al.* 2019); and EU Habitats Directive.

Available information on the known occurrence of bats, the suitability of the proposed development site at landscape level and historically recorded roosts was considered as part of the desktop survey. A data request for historic bat roost data was submitted to Bat Conservation Ireland.



**Figure 5.6: Trail Camera and Bat Detector Deployment Locations**

### Passive Detector Surveys

In order to inform an assessment of the likely effects of the project on bats, surveys were carried out to characterise the importance of the site for bats.

An ultrasonic detector survey was carried out at the wind farm site to record bat activity in the area from which information on species composition, relative abundance and landscape usage could be derived.

A multi-season passive detector survey was carried out from Spring 2021 to Autumn 2021 following SNH (2021) guidelines, with modifications for an Irish context. This saw the simultaneous deployment of 7 no. passive detectors at (or in the immediate

vicinity of) turbine locations. A detector was also deployed on a meteorological mast in Autumn 2021 where 1 no. microphone was placed at ground level and a second at approximately 50m above ground level.

The locations of detectors deployed is provided at **Table 5.1** below and illustrated at **Figure 5.6**. Details of the dates and weather conditions during bat detector deployment are summarised at **Annex 5.5**.

ID	Location (ITM)	
	ITM_Easting	ITM_Northing
Bat_1	661469	667063
Bat_2	661937	666819
Bat_3	661024	666201
Bat_4	661036	665526
Bat_5	660871	666652
Bat_6	660799	667128
Bat_7	661094	667624
Bat_MM	661501	666412

**Table 5.1: Passive Bat Detector Deployment Locations (Spring 2021–Autumn 2021)**

Wildlife Acoustic's SM4 full-spectrum bat detectors were deployed and detectors were set to record from 30-minutes before sunset until 30-minutes after sunrise. The detectors automatically adjust their start and finish times based on sunrise and sunset.

Species identification was aided by *post hoc* sonogram analysis using Wildlife Acoustics' Kaleidoscope Professional software (v. 5.4.8) and BTO's 'acoustic pipeline'. The species identification of a subset of recordings was manually verified according to Russ (2012) and Middleton *et al.* (2014).

Individual bats of the same species cannot be distinguished by their echolocation alone and therefore 'bat registrations' are used as a measure of activity (Collins, 2016). A bat pass is defined as a recording of an individual species echolocation with a of maximum 15-seconds duration. All bat passes recorded in the course of this study follow these criteria, allowing for comparison between monitoring stations.

The survey locations are considered to provide good coverage of the project site. All wind turbines are proximal to a bat monitoring point; while the likelihood of design changes throughout the assessment process is acknowledged in NatureScot (2021). A technical issue with an individual recorder was experienced during the Spring 2021 recording period when the detector at turbine T3 failed to record. However, data was recorded for more than 10-suitable nights at other survey locations and it is assessed that an appropriate level of coverage was achieved overall.

Although commonly applied in Ireland, the NatureScot (2021) guidelines *Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation* were written for a Scottish context. While survey effort and design for the subject project are carried out according to the guidelines, their precise implementation were adapted to an Irish context in the following ways:-

- NatureScot (2021) recommends the use of an online tool, 'Ecobat' to provide a measure of relative bat activity. The tool compares site specific inputted data to

a comparator database to provide an interpretation of the level of bat activity compared to other sites in Britain. The tool is not considered to be relevant in an Irish context (different range of species and differing ecology) and therefore interpretation of relative activity level at the project site versus other similar sites in Ireland relies on the expertise and experience of the authors; and,

- Assessment of vulnerability of bats to wind farms, including assessment of collision risk, generally follows the procedure outlined in SNH (2019) but with amendments to reflect the Irish species assemblage and the different relative abundance of individual species in an Irish context.

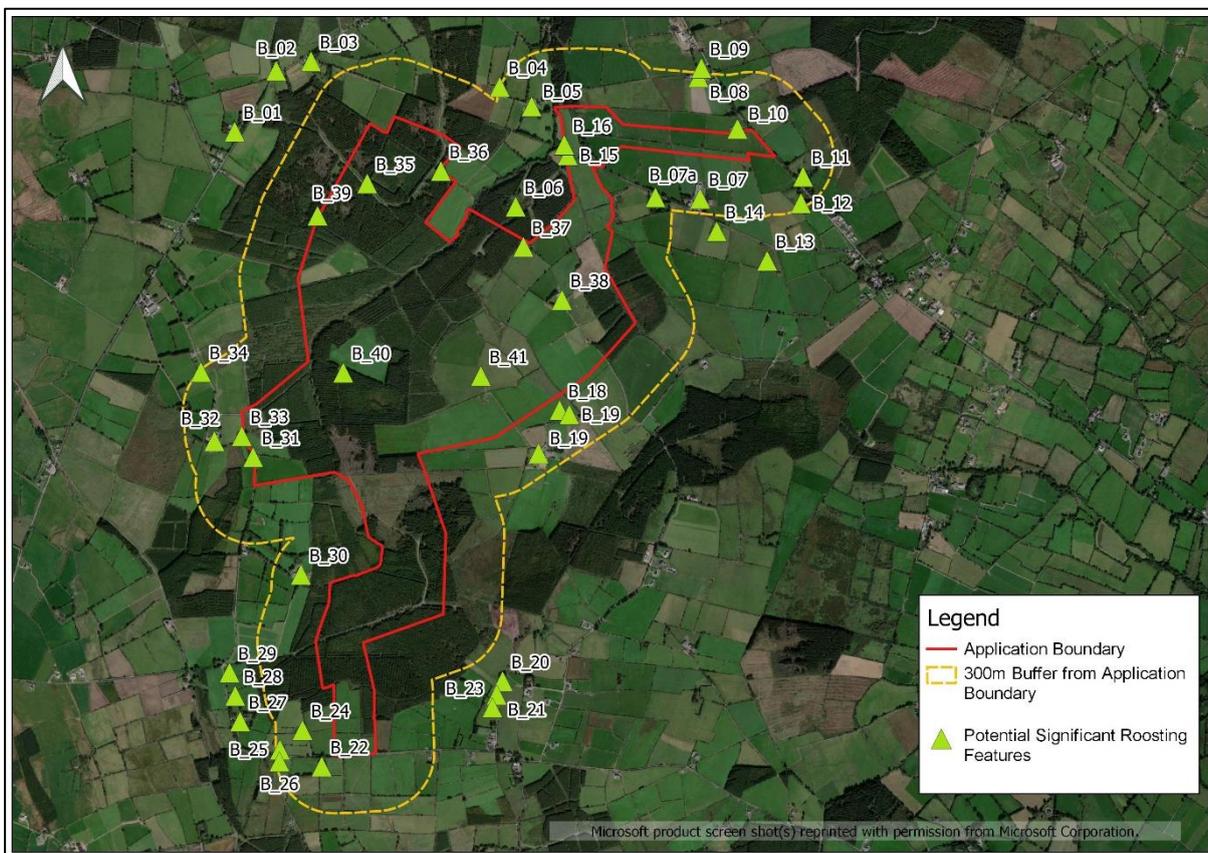


Figure 5.7: Passive Bat Detector Deployment Locations

### Visual Assessment of Bat Roosting Features

NatureScot (2021) recommends surveys to identify key bat features such as maternity roosts or large hibernation or swarming sites. A study area extending '200m plus 1 no. rotor radius' from the 'proposed development' is recommended. In this instance the rotor radius of the wind turbines is 81m (diameter is 162m) and, per NatureScot, would require a study area of 281m. A conservative buffer of 300m to the site boundary has been applied.

Within this area, potential roosting features (PRFs) were initially identified by analysis of historic 6" mapping and aerial imagery followed by subsequent ground-truthing. Daytime visual assessments of potential bat roost features within and proximate to the wind farm site were carried out on 21 December 2021, 6 April 2022 and 7 April 2022. Features identified from the desk study predominantly consisted of buildings (see **Figure 5.8**) but other features including bridges, culverts and trees were also assessed.



**Figure 5.8: Potential Roost Features Survey Locations**

Surveys and description of PRFs were carried out according to Collins (2016). PRFs are described according to the scheme shown in **Table 5.2** below.

Suitability	Description
Negligible	Negligible features which are likely to be used by roosting bats.
Low	A feature with one or more potential roost sites that could be used by individual bats opportunistically.
Moderate	Potential roost sites which do not provide appropriate conditions and / or suitable surrounding habitat to be used on a regular basis

Suitability	Description
	or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation).
High	A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.

**Table 5.2: Scheme for describing the potential suitability of features for bats**

*'Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Edition)', Collins (2016).*

### Active Bat Surveys

Active bat surveys were used to complement the information gained from passive bat monitoring. The aim of the surveys was to identify any particular flightlines which may be apparent and to identify emergence behaviour which would indicate the presence of a roost. Active bat surveys were carried out at the wind farm site for at least 1.5-hours from dusk on 18 August 2021, 26 August 2021, 15 September 2021 and 1 June 2022. The locations of active survey tracks are illustrated at **Figure 5.9**, based on GPS units carried by the surveyors.

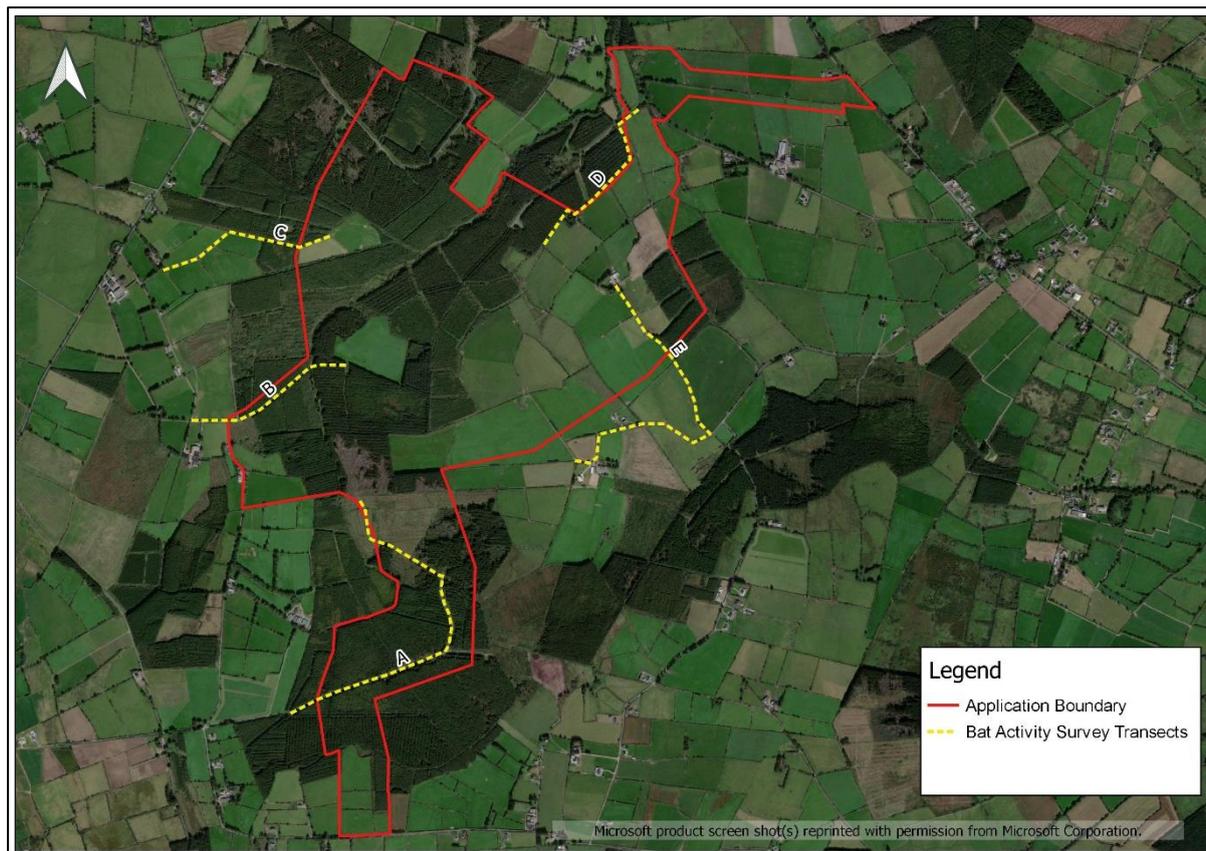
The survey on 1 June 2022 was a targeted emergence survey on a target structure (B38). This residence and farm building was identified as having moderate suitability to support significant numbers of roosting bats and full access for visual survey was not available. The survey was carried out following Collins (2016) guidelines in suitable weather conditions (temp: 15°C; wind F1; dry). The survey commenced at 21:30 and concluded at 23:15. Guide IR thermal imaging cameras were utilised as an aid to visual assessment during the surveys in accordance with best practice guidelines<sup>4</sup>.

Active bat surveys were carried out along the grid connection route in order to assess the level of activity, species diversity and to identify any areas of relatively high activity. The surveys were carried out on the night of 24 August 2021. Existing tracks and roads were utilised for safety reasons.

Driven transects were carried out along the grid connection route following Roche *et al.* (2008) on 24 August 2021 in suitable weather conditions.

Active surveys utilised Wildlife Acoustic's EMT 2 Pro detectors to record bat echolocation, and these were subsequently analysed using Kaleidoscope software.

<sup>4</sup> <https://cdn.bats.org.uk/uploads/pdf/Interim-guidance-note-on-NVAs-May-2022-FINAL.pdf?v=1653399882>



**Figure 5.9: Potential Roost Features Survey Locations**

#### 5.2.4.5 Aquatic Ecology Surveys

A desktop study was carried out to collate information available from previous studies relevant to the project site. A number of papers, documents and articles relevant to the project site as well as a range of online resources were utilised in accessing a variety of information including:-

- EPA website ([www.epa.ie](http://www.epa.ie));
- NPWS website ([www.npws.ie](http://www.npws.ie));
- OPW ([www.opw.ie](http://www.opw.ie));
- National Biodiversity Data Centre website ([www.biodiversityireland.ie](http://www.biodiversityireland.ie));
- IFI website ([www.fisheriesireland.ie](http://www.fisheriesireland.ie));
- Water Matters website ([www.catchments.ie/download/water-matters-say/](http://www.catchments.ie/download/water-matters-say/));
- GSI website ([www.gsi.ie](http://www.gsi.ie)); and,
- ViewrangerGPS.

Electronic resources were reviewed prior to fieldwork in order to get an overview of the project site and to inform how best to carry out the fieldwork in terms of on-site methods, health and safety issues, potential limitations and pitfalls, and the context of the site within the greater area. The online resources were again reviewed during the preparation of this chapter in order to assess the specifics on a variety of parameters and compile them, along with the findings of the field surveys, in order to attain an accurate appraisal of the project site.

Following the findings of the initial desktop study outlined above, a site walkover was carried out in line with relevant best practice guidelines (e.g. NRA 2005, NRA 2009). Stretches of Knocknabranagh & Knockbaun Stream & Coolcullen Stream within the

site were walked<sup>5</sup>. Similarly stretches of the Dinin River South, downstream of the project site, were walked where access was gained from bridges. The aim of the walkover was to assess the aquatic habitats, the riparian habitats, the physical and hydromorphological characteristics, to look for signs of species of interest, to identify issues pertaining to the aquatic environment and determine their causes and effects where possible.

The aquatic/fisheries habitats present were assessed in terms of their ecological value using criteria adapted from NRA 2009 and Nairn & Fossitt 2004. Aquatic habitat assessment was conducted in line with the methodology in the Environment Agency's *River Habitat Survey in Britain and Ireland Field Survey Guidance Manual 2003* (EA, 2003). Habitats of use to the various life stages of salmonids are assessed based on the information provided in *Trout and Salmon. Ecology, Conservation and Rehabilitation* (Crisp; 2000). Lamprey ammocoete<sup>6</sup> habitat quality as well as the suitability of adult spawning habitat is assessed based on the information provided in Maitland (2003) and Gardiner (2003).

### Electrofishing Survey

3 no. sites were selected to be electrofished; 1 no. on the Coolcullen Stream, 1 no. on the Knocknabranagh & Knockbaun Stream, and 1 no. ~300m downstream of the confluence of both streams on the Coolcullen River (**Table 5.3**). Electrofishing followed the *WFD Electric fishing in wadable reaches* (CFB, 2008) methodology. Electrofishing was carried out over a measured distance which was determined on the day by the stream characteristics at each survey location. A minimum of 3 no. passes over each section was employed as a standard methodology to ensure capture of all fish present. Methodology for lampreys followed that of *Monitoring the River, Brook and Sea Lamprey, Lampetra fluviatilis, L. planeri and Petromyzon marinus* (Harvey & Cowx, 2003). Electrofishing for lamprey utilised pulsed fishing in suitable habitat. Full depletion was employed. Fish intercepted were stored in a container of river water, anaesthetised using clove oil and measured to the nearest millimetre (mm). Subsequent to this, the fish were allowed to recover in a container of well oxygenated river water. All fish were released alive without resulting in any damage or mortality.

Site Name	Location	Grid Reference (ITM)
Coolcullen Stream Site	Approximately 500m upstream of the confluence with the Knocknabranagh & Knockbaun Stream, in the vicinity of a proposed watercourse crossing.	E: 662039 N: 667298
Knocknabranagh & Knockbaun Stream Site	Approximately 50m upstream of the confluence with the Coolcullen Stream, as the stream leaves the drainage area of the wind farm.	E: 661818 N: 667676
Coolcullen River	At the bridge crossing of the L7122 local road, approximately 300m downstream from the confluence of the Coolcullen Stream and Knocknabranagh & Knockbaun Stream, as the river leaves the drainage area of the wind farm.	E: 661865 N: 667910

<sup>5</sup> Approximately 700m of the Coolcullen Stream and 1.2km of the Knocknabranagh & Knockbaun Stream were walked.

<sup>6</sup> The word ammocoete describes lamprey spp in their larval stage

**Table 5.3: Electrofishing Sites**

The findings of the electrofishing at each site were then combined with information gathered from the stream walkover (i.e. fisheries habitat assessment as well as other physical and hydromorphological characteristics including barriers to fish passage) in order to make a detailed fisheries assessment.

#### Biological Water Quality Analysis

Attaining a Q-value is the standard methodology of assessing the biological water quality of a watercourse in Ireland (**Table 5.4**). It is the biotic index utilised by EPA staff and sub-consultants to score watercourses as part of the Water Framework Directive and is an effective tool in determining the condition of aquatic environments. The method involves placing a kick-sample net (250mm width, 500µm mesh size) in a suitable riffle and kicking (vigorously disturbing) the riverbed for a standard duration of time (2-minutes). Aquatic invertebrates from the sample are then identified and classified according to their sensitivity to pollution; Groups A, B, C, D and E (where Group A are the most sensitive and group E are the most tolerant of pollution). As per Toner *et al.* 2005, relative numbers of each individual taxa are compiled and analysed such that each sampling site is then assigned a Q-value, a nationally recognised number that denotes water quality.

A number of survey sites were selected in order to carry out Q-value assessments. The sites were selected based on the footprint of the project in combination with the topography and hydrology of the area, as well as taking into account the project within the context of the greater catchment.

Q Value	WFD Status	Pollution Status	Condition
Q5 or Q4-5	High Status	Unpolluted	Satisfactory
Q4	Good Status	Unpolluted	Satisfactory
Q3-4	Moderate Status	Slightly polluted	Unsatisfactory
Q3 or Q2-3	Poor Status	Moderately polluted	Unsatisfactory
Q2, Q1-2 or Q1	Bad Status	Seriously polluted	Unsatisfactory

**Table 5.4: Categories of Water Quality**

#### Freshwater Pearl Mussel

Surveying for freshwater pearl mussel *Margaritifera margaritifera* (FPM) was carried out following the NPWS guidance *Margaritifera margaritifera Stage 1 and Stage 2 survey guidelines, Irish Wildlife Manuals, No. 12* (Anon, 2004). The watercourse reaches examined were subject to a presence/absence survey which involved wading in the river while viewing the substrate and looking for FPM with the aid of a bathyscope and with polarised sunglasses. The survey also involved checking for the presence of dead shells, particularly in depositing areas. Transect surveys were carried out, with the location of each recorded by GPS. Searches for FPM were also carried out when walking between transect locations when access and water depth allowed.

The river condition and habitat features at each survey stretch were noted. The potential for FPM to occur along each stretch was assessed with reference to *Conserving Natura 2000 Rivers Ecology Series No. 2 'Ecology of the Freshwater Pearl Mussel* (Skinner *et al.*, 2003). The habitat was evaluated with reference to Environmental Quality Objectives (EQOs) as specified in Schedule 4 of the

'European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations', S.I. 296 of 2009 (see **Table 5.5** below).

Element	Objective	Notes
Filamentous algae (Macroalgae)	Absent or Trace (<5%)	Any filamentous algae should be wispy and ephemeral and never form mats.
<i>Phytobenthos</i> ( <i>Diatoms</i> )	EQR 0.93	High status
Macrophytes - Rooted higher plants	Absent or Trace (<5%).	Rooted macrophytes should be absent or rare within the mussel habitat.
Siltation	No artificially elevated levels of siltation.	No plumes of silt when substratum is disturbed.

**Table 5.5: Habitat Evaluation according to EQOs**

The survey was carried out under licence (No. C218/2021) from NPWS and was led by accredited FPM surveyor Gerard Hayes with aquatic ecologist Rory Dalton. The wind farm and grid connection route are within a catchment listed in the NPWS *Margaritifera* Sensitive Areas Map. This catchment is identified as a 'Catchments of SAC populations listed in S.I. 296 of 2009'. The areas surveyed were selected on the basis of accessibility (incl. safety), proximity to the project site, watercourse size, and suitability within the receiving environment (**Table 5.6**).

Survey Reach Code	Location	No. of Transects	Length Surveyed
R1	D/S of L7122 Bridge to Phillips Bridge	20	1.2km
R2	Phillips bridge to Dinin Confluence	20	1.1km
R3	U/S of Coan Bridge	20	1.2km
R4	D/S of Uskerty Bridge	20	1km

**Table 5.6: Sampling locations surveyed for Freshwater Pearl Mussel**

#### 5.2.4.6 Other Taxa

Other taxa (e.g. Lepidoptera, Odonata, Amphibians and reptiles) encountered during the field surveys were recorded for inclusion in this assessment. The historical occurrence of such species was also considered by consulting available desktop data sources.

The conservation status of such taxa was assessed by examining their inclusion in one or more of the following: Irish Wildlife Acts (1976 – 2012); Irish Red List for Butterfly (Regan *et al.* 2010); Irish Red List for Damselflies & Dragonflies (Nelson *et al.* 2011); Irish Red List for Amphibians, Reptiles & Freshwater Fish (King *et al.* 2011); Regional Red List of Irish Bees (Fitzpatrick *et al.* 2006); and the EU Habitats Directive.

Small areas of scrub in the study area, including within the wind farm site, where Devil's Bit Scabious *Succisa pratensis* the larval food plant of Marsh Fritillary *Euphydryas aurinia* were identified during habitat and botanical surveys were visited in late August 2021 to record the presence or absence of the protected butterfly species.

No specific Common Frog *Rana temporaria* surveys were considered necessary and frogs were recorded on casual basis when observed during site walkovers. There are relatively few areas of suitable breeding habitat within or proximate to the project site

and GIS and scoping surveys noted very few ponds or drains considered capable of supporting breeding frogs or Smooth Newts, *Lissotriton vulgaris*, based on criteria outlined in JNCC (2003). In addition, the design of the project avoids directly affecting areas of standing water within the project site.

#### 5.2.4.7 Invasive Species

During the habitat and botanical walkover surveys, a search for non-native invasive species was undertaken. The survey focused on the identification of invasive species listed under the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (As Amended) (S.I. 477 of 2015).

#### 5.2.4.8 Other Study Areas

##### Haul Route Works Locations

The haul route works locations were surveyed to identify the presence of any protected or important species (e.g. mammals or invasive plant species) that could be affected by the project.

The Black Bridge works location was also inspected as part of the aquatic surveys.

##### Grid Connection Route

As described in the preceding sections, the grid connection route was surveyed as part of the habitat, botanical and faunal surveys. A follow-up survey of the grid connection route was carried out in August 2022 to confirm the absence of Third Schedule species,

##### Replant Lands

The replant lands in Co. Monaghan were surveyed in March 2022 to identify the presence of important mammal or botanical species.

#### 5.2.4.9 Evaluation Criteria for Ecological Assessment

Ecological evaluation of the study area for terrestrial biodiversity follows criteria amended after NRA (2009) and Nairn & Fossitt (2004; **Annex 5.2**).

#### 5.2.5 Limitations to Assessment

The information contained in this chapter includes robust data which has been used to assess the likely significant effects of the proposed development on biodiversity. No substantial limitations were identified in terms of scale, scope or context in the preparation of this assessment.

The following minor survey and data analysis limitations were encountered and have been fully accounted for in the impact assessment:-

- Much of the field surveys were carried out during the COVID-19 pandemic. It presented certain challenges in terms of travel restrictions and difficulty in finding accommodation for surveyors travelling greater distances. Notwithstanding the logistical challenges encountered, it was possible to carry out all of the necessary survey work, at the optimal periods;
- Technical issues were identified with one of the bat detectors deployed during Spring 2021. Survey effort for other survey locations went above and beyond recommended levels and overall, it is considered that appropriate coverage was achieved

### 5.2.6 Impact Assessment

Ecological surveys for the project were undertaken following specific guidelines for habitats and species, as outlined in the preceding sections, and with reference to the relevant national legislation and policy. The importance of the habitats and species present is evaluated using the guidance document *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal, and Marine* published by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2018, updated 2019) and *Good Practice Guidance for Habitats and Species* (CIEEM 2021). This document outlines an accepted approach for the evaluation of potential impacts from such developments.

The description and evaluation of likely and residual effects arising from the project on the existing terrestrial biodiversity of the study area and surrounding area follows guidelines published by the EPA (2022) with reference to CIEEM (2018, 2019 and 2021).

#### 5.2.6.1 Assessment of Cumulative Effects

Cumulative effects can result from individually insignificant, but collectively significant, actions occurring over a period of time or concentrated in a location (CIEEM, 2019). As such, these types of effects may be characterised as:-

- Additive/incremental – in which multiple activities/projects (each with potentially insignificant effects) add together to contribute to a significant effect due to their proximity in time and space (CIEEM, 2018, updated 2019); or,
- Associated/connected – where a development activity ‘enables’ another development activity e.g. phased development as part of separate planning applications. Associated developments may include different aspects of the project which may be authorised under different consent processes. It is important to assess the potential impacts of the ‘project’ as a whole and not ignore impacts that fall under a separate consent process (CIEEM, 2018, updated 2019).

### 5.3 Description of the Existing Environment

The following sections describe the results of the detailed desktop and field surveys that were undertaken to inform and ecological impact assessment of the proposed development.

#### 5.3.1 Designated Conservation Sites

There are no nationally or European designated sites located within or immediately adjacent to the project site (**Figure 5.10**).

**Table 5.7** shows the minimum distance between the project site and European and nationally designated conservation sites. The minimum distance from the closest of the proposed turbines is provided below. The search area has been set to a nominal 15km offset from the site boundary. This is an arbitrary distance typically used for illustrative purposes (e.g. DoEHLG 2009). The likelihood of effects upon more distant designated sites is also considered in the event that any likely significant effects are identified in relation to these distant sites during the assessment process. The Source-Pathway-Receptor model is used, along with a knowledge of the sensitive species and habitats for which sites are designated, to identify any likely significant effects which could arise as a result of the project.

Site Name	Site Code	Minimum Distance from Project Site (km)	Minimum Distance from nearest Turbine (km)
Natura 2000 Sites			
River Barrow & River Nore SAC	002162	0.0	1.7
River Nore SPA	004233	11.5	13.0
Lisbigney Bog SAC	000869	12.4	19.6
Nationally Designated Sites			
Mothel Church, Coolcullen pNHA	000408	1.6	1.9
Coan Bogs NHA	002382	2.1	4.7
Whitehall Quarries pNHA	000855	4.1	4.7
Cloghrystick Wood pNHA	000806	7.1	8.3
Dunmore Cave pNHA	000401	9.4	10.1
Esker Pits pNHA	000832	10.0	10.6
Ballymoon Esker pNHA	000797	10.2	10.7
Dunmore Complex pNHA	001859	11.5	12.2
Newpark Marsh pNHA	000845	11.8	12.6
Lisbigney Bog pNHA	000869	12.4	19.6
Archersgrove pNHA	002051	12.6	13.5
River Nore/Abbeyleix Woods Complex pNHA	002076	13.3	16.7
Ardaloo Fen pNHA	000821	13.5	14.1
Lough Macask pNHA	001914	13.6	14.4
Clopook Wood pNHA	000860	14.1	23.2
Red Bog, Dungarvan pNHA	000857	14.3	15.2
Ballylynan pNHA	000846	14.4	20.7
Timahoe Esker pNHA	000421	14.6	24.6

**Table 5.7: Distances to Designated Nature Conservation Sites**

The small works area (carriageway strengthening) at Black Bridge on the L1835/L3037 is just upstream of the River Barrow and River Nore SAC (002162). The closest turbine location to this designated site is 1.7km distant. There are only 2 no. further Natura 2000 sites located within the 15km hinterland of the application site. River Nore SPA (004233) is situated 11.5km and Lisbigney Bog SAC (000869) is located 12.4km from the project. As described above, there are no other SPA sites located within 30km of the application site.

The qualifying and special conservation interests of the Natura 2000 sites located within 15km of the site are summarised in **Table 5.8**.

There are 17 no. pNHAs and one NHA located within 15km of the project (**Figure 5.11**). The closest of these sites is Mothel church, Coolcullen pNHA (000408) located 1.6km from the project and 1.9km from the nearest turbine location. Mothel Church is home

to a nursery colony of Natterer's bats (*Myotis nattereri*) which use the loft and bell tower of the church. Coan Bogs NHA (002382) is located to the north of the wind farm, over 2km from the application site. The only other nationally designated site located within 5km is Whitehall Quarries pNHA (000855), which is made up of two disused shale/slate quarries 5km west of Bagnelstown. The quarry tips and the floors of the old working areas now provide a rich variety of dry acidic habitats, which have been colonised to a greater or lesser extent by a variety of plants typical of such dry habitats such as Bilberry (*Vaccinium myrtillus*).

The Screening for Appropriate Assessment (AA) which accompanies the NIS details the aspects of the project which could in the absence of adequate mitigation lead to likely significant effects on designated Natura 2000 sites in the receiving environment. A NIS has been prepared in support of the AA process which further considers the potential for adverse impacts upon the designated sites and their qualifying interests which were identified at screening stage. Mitigation measures, including detailed construction management measures are presented which will be effective in avoiding ecological risks. It has been objectively concluded that the project will not adversely affect the integrity of any Natura 2000 site, and there is no reasonable scientific doubt in relation to this conclusion.

Site Name	Qualifying/Special Conservation Interests
River Barrow & River Nore SAC	<ul style="list-style-type: none"> <li>• Estuaries [1130];</li> <li>• Mudflats and sandflats not covered by seawater at low tide [1140];</li> <li>• Reefs [1170];</li> <li>• Salicornia and other annuals colonising mud and sand [1310];</li> <li>• Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330];</li> <li>• Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410];</li> <li>• Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation [3260];</li> <li>• European dry heaths [4030];</li> <li>• Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430];</li> <li>• Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220];</li> <li>• Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0];</li> <li>• Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) [91E0];</li> <li>• <i>Vertigo moulinsiana</i> (Desmoulin's Whorl Snail) [1016];</li> <li>• <i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029];</li> <li>• <i>Austropotamobius pallipes</i> (White-clawed Crayfish) [1092];</li> <li>• <i>Petromyzon marinus</i> (Sea Lamprey) [1095];</li> <li>• <i>Lampetra planeri</i> (Brook Lamprey) [1096];</li> <li>• <i>Lampetra fluviatilis</i> (River Lamprey) [1099];</li> </ul>

	<ul style="list-style-type: none"> <li>• <i>Alosa fallax fallax</i> (Twaite Shad) [1103];</li> <li>• <i>Salmo salar</i> (Salmon) [1106];</li> <li>• <i>Lutra lutra</i> (Otter) [1355];</li> <li>• <i>Trichomanes speciosum</i> (Killarney Fern) [1421]; and,</li> <li>• <i>Margaritifera durrovensis</i> (Nore Pearl Mussel) [1990]</li> </ul>
River Nore SPA	<ul style="list-style-type: none"> <li>• Kingfisher (<i>Alcedo atthis</i>) [A229]</li> </ul>
Lisbigney Bog SAC	<ul style="list-style-type: none"> <li>• Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> [7210]; and,</li> <li>• <i>Vertigo moulinsiana</i> (Desmoulin's Whorl Snail) [1016]</li> </ul>

**Table 5.8: Qualifying and Special Conservation Interests of Natura 2000 sites situated within 15km**

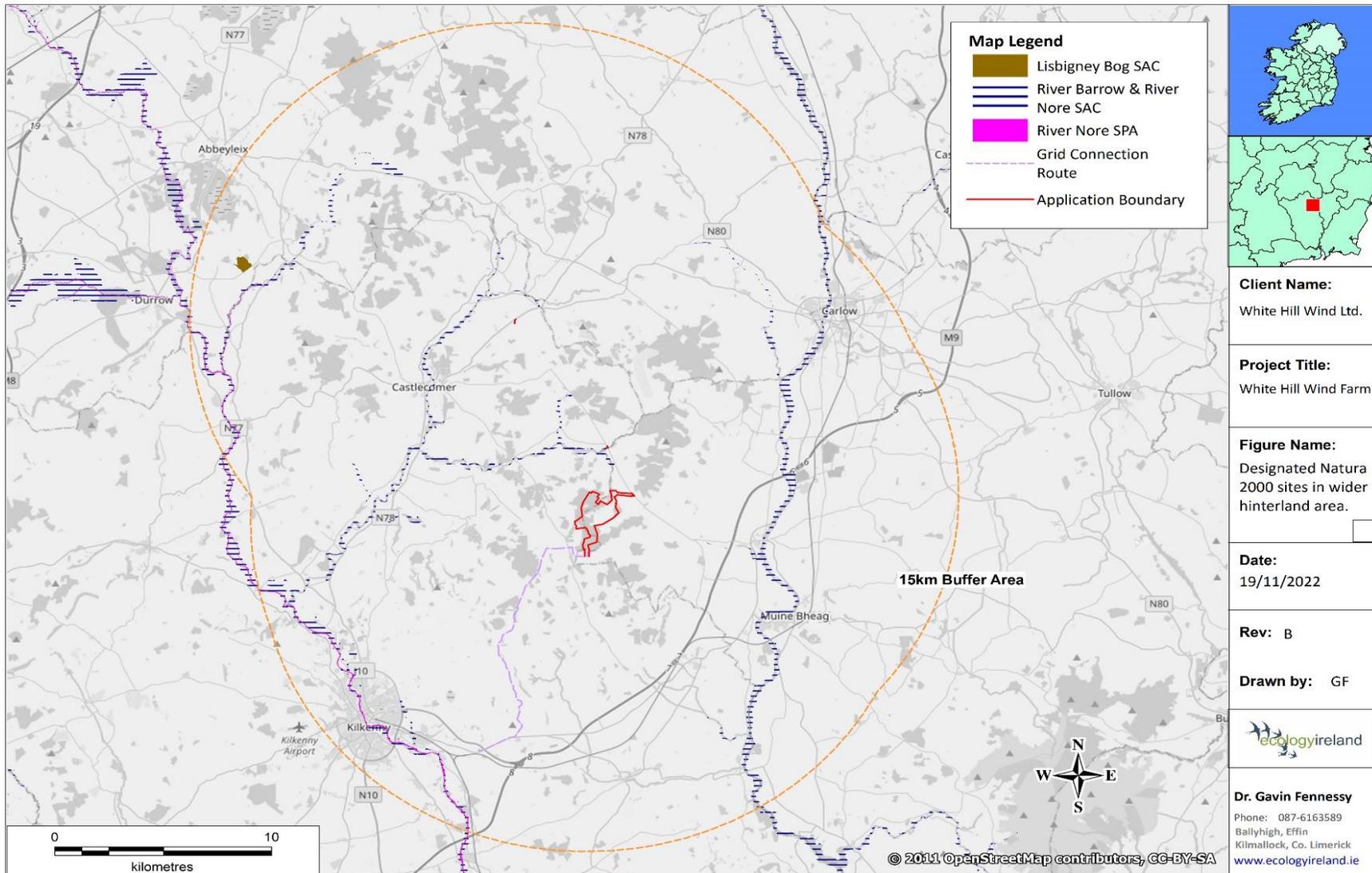


Figure 5.10: Map of Natura 2000 Sites within 15km

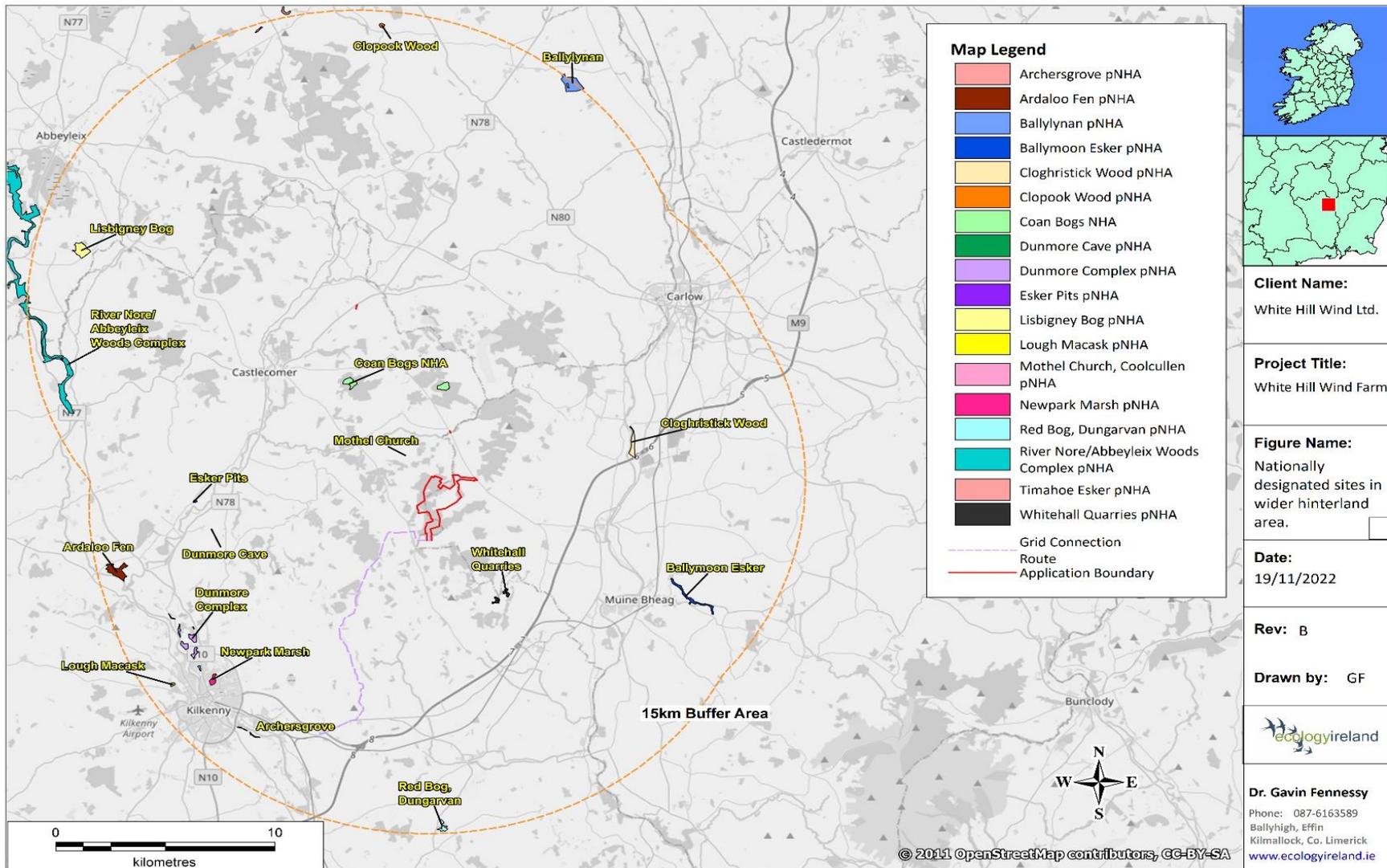


Figure 5.11: Nationally Designated Nature Conservation Sites within 15km

### 5.3.2 Habitats

A review was carried out of historical botanical records for the grid squares that overlap the project site. Three Red listed 'near threatened' species (Wyse-Jackson *et al.*, 2016) have historically been recorded within the grid squares that overlap the project site; *Veronica agrestis* or Green speedwell found on bare disturbed ground, the Dwarf mallow *Malva neglecta* found on dry, waste ground and Greater knapweed *Centaurea scabiosa* found on dry banks and pastures. These plants have been classified as near threatened due to a decline in their areas of occupancy (**Table 5.9**).

Common Name	Scientific Name	Flora Protection Order 2022	Red Data Book Category (Wyse-Jackson <i>et al.</i> , 2016)	Grid Square	Habitat
Green speedwell	<i>Veronica agrestis</i>	Not listed	Near threatened	S66	Found on bare, disturbed ground
Dwarf mallow	<i>Malva neglecta</i>	Not listed	Near threatened	S66	Waste places, dry habitats, sometimes at the base of a wall.
Greater knapweed	<i>Centaurea scabiosa</i>	Not listed	Near threatened	S66	Dry banks and pastures

**Table 5.9: Rare or Protected Plant Species previously recorded from the S66 grid square (NBDC & BSBI databases)**

#### 5.3.2.1 Invasive Plant Species

The NBDC<sup>7</sup> database and BSBI database for grid squares overlapping the study area hold records for 13 no. non-native invasive plant species (see **Table 5.10** below) including 5 no. species listed under the Third Schedule Part I under Regulations 49 and 50 of the European Communities (Birds and Natural Habitats Regulations 2011) species comprising Japanese Knotweed *Fallopia japonica*, Giant Hogweed *Heracleum mantegazzianum*, Canadian waterweed *Elodea canadensis*, Water fern *Azolla filiculoides* and Indian Balsam *Impatiens glandulifera*. Regulation 49 of the Birds and Natural Habitats Regulations 2011 prohibits the planting, allowing or causing dispersal, and spreading of any plant listed in the Third Schedule. 5 no. of the non-native invasive species historically recorded are categorised as high Impact invasive species (Kelly *et al.*, 2013; NBDC dataset). The remaining species are categorised as medium risk and low risk and are not listed in the Third Schedule.

Common Name	Scientific Name	Listed in Third Schedule Part I * (Y/N)	Risk Rating (Kelly <i>et al.</i> , 2013) and/or NBDC Risk rating
Japanese Knotweed	<i>Reynoutria japonica</i>	Y	High
Travellers joy	<i>Clematis vitalba</i>	N	Medium
Cherry laurel	<i>Prunus laurocerasus</i>	N	High

<sup>7</sup> <https://maps.biodiversityireland.ie/Map> (accessed 06/11/2022)

Common Name	Scientific Name	Listed in Third Schedule Part I * (Y/N)	Risk Rating (Kelly <i>et al.</i> , 2013) and/or NBDC Risk rating
Montbretia	<i>Crocoshia pottsii</i> x <i>aurea</i> = <i>C. x crocosmiiflora</i>	N	Not classified
Sycamore	<i>Acer pseudoplatanus</i>	N	Medium
Buddleia	<i>Buddleja davidii</i>	N	Medium
Giant Hogweed	<i>Heracleum mantegazzianum</i>	Y	Low
Canadian Waterweed	<i>Elodea canadensis</i>	Y	High
Indian Balsam	<i>Impatiens glandulifera</i>	Y	High
Winter heliotrope	<i>Petasites pyrenaicus</i>	N	Low
Three cornered garlic	<i>Allium triquetrum</i>	N	Medium
Water Fern	<i>Azolla filiculoides</i>	Y	Medium
Narrow-leaved Ragwort	<i>Senecio inaequidens</i>	N	Medium

**Table 5.10: Non-native Invasive Plant Species recorded from the S66 grid square (per NBDC & BSBI databases).**

### 5.3.2.2 Habitats and Flora

No Annex I habitats listed under the EU Habitats Directive were recorded within the project site, study area, haul route works locations, or along the grid connection route. No botanical species protected under the Flora (Protection) Order 2022, listed in Annex II or IV of the EU Habitats Directive (92/43/EEC) were recorded. Furthermore, no Bryophytes protected under the Flora (Protection) Order 2022 are documented for the study area (Flora Protection Order Map Viewer NPWS).

The main habitats recorded within the study area are listed at **Table 5.11**. The habitat map of the wind farm site is detailed at **Figure 5.12**. The area in which the wind farm is to be located consists of an undulating rural landscape with a number of low-lying hills, small watercourses and scattered farm settlements. A high point of 296m OD occurs at Knockabrannagh and Knockbaun townland in the centre of the wind farm site. The habitats within the study area reflect a landscape that has been the subject of considerable anthropogenic influence largely for agricultural land use and in more recent times for commercial forestry operations.

The dominant habitats are agricultural grassland. The improved agricultural grassland present in this area is intensively managed and is subject to ongoing fertilisation and drainage for dairy and beef cattle farming. The wind farm footprint will be primarily located on Conifer Plantation (WD4) or improved agricultural grassland (GA1) set out in large open fields, with smaller areas of spoil and bare ground (ED2) also present in the form of a network of farm access tracks. The development footprint will also be located on areas of higher value semi-natural grassland classified as Wet Grassland (GS4). The wet grassland where turbine T3 is located is an area which supports a relatively diverse species assemblage and a portion of this wet grassland habitat will be lost as a result of the direct footprint of the project.

Other types of semi-natural grassland recorded included Dry meadows and grassy verges (GS2) located along field margins and farm and forestry tracks. Field boundaries were comprised of treelines (WL2) and hedgerows (WL1) some of which are mature and long established and date back to the 1830's as evidenced in historic OSI 6-inch mapping. A number of eroding upland streams (FW1) traverse the study area, all of which are tributaries of the Dinin South which itself is a tributary of the River Nore. Both the Dinin South and River Nore form part of the River Barrow and River Nore SAC.

Fossitt Code	Habitat Type	Habitat Evaluation	Correspondence with Annex 1
GS2	Dry meadows and grassy verges	Local Importance (Lower value)	Lowland haymeadows ( <i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i> ) 6510
GA1	Improved agricultural grassland	Local Importance (Lower value)	-
GS4	Wet Grassland	Local Importance (Higher value)	6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils ( <i>Molinia caerulea</i> )
WL1	Hedgerows	Local Importance (Higher value)	-
WL2	Treelines	Local Importance (Higher value)	-
WD1	Mixed broadleaved woodland	Local Importance (Higher value)	-
WS2	Immature woodland		-
WS5	Recently felled woodland		-
ED2	Spoil and bare ground	Negligible Importance	-
BL3	Buildings and artificial surfaces	Negligible Importance	-
BL1	Stonewalls and other stonework	Local Importance (Lower value)	-
FW1	Eroding/upland Rivers	Local Importance (Higher – International value)	Annex I habitat 'watercourses of plain to montane levels with <i>Ranunculus fluitans</i> and <i>Callitriche-Batrachion</i> vegetation' (3260)
FW4	Drainage ditch	Local Importance (Higher value)	-

**Table 5.11: Summary of Habitats (classified in accordance with Fossitt, 2000) within the Study Area, their respective evaluations as per NRA (2009) and their respective correspondence, if any, to EU Annex I Habitats**

Within the wind farm development site the dominant habitats present are Conifer Plantation (WD4) and Improved agricultural grassland (GA1; **Figure 5.12**) and both are evaluated as being of Local Importance (Lower value).

Other habitats recorded within the wind farm site included hedgerows (WL1), Wet grassland (GS4), Dry meadows and grassy verges (GS2) Treelines (WL2) and Eroding upland streams (FW1) of Local Importance (Higher value). Drainage ditches (FW4), Stone walls and other stonework (BL1) and Amenity grasslands (GA2), Buildings and artificial surfaces (BL3) and Spoil and bare ground (ED2) were classified as being of Local Importance (Lower value).

The main habitats recorded within the wind farm study area are listed in **Table 5.11**. The habitat map of the proposed scheme is detailed in **Figure 5.12**.

### Improved Agricultural Grassland (GA1)



**Plate 5.1: Improved Agricultural Grassland (GA1)**

One of the dominant habitats within the study area is Improved Agricultural Grassland (GA1) and the majority of the wind farm infrastructure is located within this habitat type. Improved Agricultural Grassland is intensively managed or highly modified grassland that has been reseeded is regularly fertilised and grazed and/or used for silage making. Species composition included abundant Perennial rye *Lolium perenne* grass and other occasional grass species including Yorkshire fog *Holcus lanatus*, Creeping bent *Agrostis stolonifera*, annual meadow grass *Poa annua* and Meadow foxtail *Alopecurus pratensis*, and Crested dogs-tail. Relative abundance of the different grass species varied in different fields depending on the grazing regime and level of grassland management. In some areas where there was more extensive cattle

grazing/less management, the Perennial rye grass did not dominate as much, instead a greater of mix of grass species were recorded with Perennial rye grass including frequently occurring Crested dogs-tail, Yorkshire fog, Meadow foxtail and Creeping bent. Broadleaved species within the improved grassland sward were comprised of frequent Dandelion *Taraxacum* spp and Common mouse ear *Cerastium fontanum* occasional Broad-leaved dock *Rumex obtusifolius*, Creeping buttercup *Ranunculus repens*, Meadow buttercup *Ranunculus acris*, pineapple weed *Matricaria discoidea* and Greater plantain *Plantago major*.

Improved Agricultural Grassland (GA1) is evaluated as being of Local Importance (Lower Value) due to its intensively managed nature albeit in less intensively managed fields the improved grassland did support a greater variety of botanical species.

### Hedgerows (WL1)



**Plate 5.2: Hedgerows (WL1)**

Hedgerows are well established across the study area and formed the natural livestock proof boundaries along the agricultural grassland fields. Active management of the hedgerows was evident in many places and included cutting of hedgerows to c 2-3m high with some intermittent trees allowed to remain in places. This was particularly evident along farm tracks and public roads. Elsewhere the hedgerows have been allowed to grow and management was less intense, these hedgerows were generally 4-5m in height with trees such as Sycamore *Acer pseudoplatanus*, Ash *Fraxinus excelsior* and Whitethorn *Crataegus monogyna*. The shrub layer consisted of frequently occurring Bramble *Rubus fruticosus* agg. and Gorse *Ulex europaeus*. The quality of hedgerows and species composition within them varied across the study area; in places the hedgerows were species poor and gappy and in other areas hedgerows were mature and long established with a good variety of species which included ferns and bryophytes. A notably mature hedgerow was recorded along an existing farm track in the northeast of the study area leading to an

old farmstead. OSi mapping indicates that the hedgerow system and farmstead at this location; which are outside the direct footprint of the project; have been present for almost 200-years. The hedgerow leading to the farmstead consisted of a tall earthen bank which was covered in a dense bryophyte under-layer composed of abundant *Thuidium tamariscinum* moss. A good variety of ferns were also recorded and included frequently occurring Soft shield fern *Polystichum setiferum*, Male fern *Dryopteris filix-mas*, Broad buckler fern *Dryopteris dilatata* and Black spleenwort *Asplenium adiantum-nigrum*. Other herbaceous plants present included frequent Common dog violet *Viola riviniana*, Bugle *Ajuga reptans*, Red fescue *Festuca rubra*, Creeping bent and occasional Foxglove *Digitalis purpurea*, Bramble, Marsh bedstraw *Galium palustre*, Germander speedwell *Veronica chamaedrys*, Sweet vernal grass *Anthoxanthum odoratum*, Yorkshire fog *Holcus lanatus* and Cocksfoot *Dactylis glomerata*. The presence of woodland species component in the hedgerow is likely to be a result of the shading from nearby mature trees in the adjacent farmstead and from the adjacent Coniferous plantation which is c 15-20m in height.

In other areas, hedgerows were low and treeless and composed of abundant Billberry *Vaccinium myrtillus*. This plant is found mostly on acid heathland and damp mountainsides. Its presence in the hedgerow denotes the upland nature of the area and is likely a remnant population from when heath habitat was more common in the area prior to agricultural intensification and afforestation.

Hedgerows often form refuges for plant species which may have occurred more frequently in the landscape in the past. Woodland flora was well represented in the hedgerows across the study area along with heathland species such as *Vaccinium myrtillus* indicative of the upland nature of the area.

Hedgerow (WL1) habitat located within the study area is evaluated as being of Local Importance (Higher Value). While the hedgerow was highly managed or in poor condition in some places, many of the hedgerows were well established with a good species assemblage present. Hedgerows are important ecological corridors, providing habitat for insects (e.g. white tailed bumble bees were recorded entering and exiting hedgerows) and supports plants which provide food and shelter to pollinating insects, birds and other fauna and is as such beneficial to the local biodiversity.

#### Conifer Plantation (WD4)

Large blocks of commercial conifer plantations (WD4) of various age classes occur throughout the wind farm study area. The commercial conifer plantation consists predominately of 1<sup>st</sup> rotation plantations which are at various stages of maturity. The age classes present are dominated by blocks of mature and semi-mature closed canopy plantations (**Plate 5.3**). The conifer plantations present are typically species poor; dominated by regular, uniform stands of commercial timber tree species including Sitka Spruce *Picea sitchensis*. Along some of the conifer plantation edges, a narrow band of deciduous tree species such as Alder *Alnus glutinosa*, Beech *Fagus sylvatica* and Birches (e.g. Silver Birch *Betula pendula* and Downy Birch *B. pubescens*) have also been planted.



**Plate 5.3: Conifer Plantation (WD4)**

The conifer plantation ground flora is typically poor but includes occasional Common Bent *Agrostis capillaris*, Wood Sorrel *Oxalis acetosella* and mosses such as *Rhytidiadelphus squarrosus*, *Hypnum jutlandicum* and *Thuidium tamariscinum*. The ground flora can be mostly found along the plantation edges as; away from the edge towards the centre of the forest; the canopy closes in, light levels are much reduced and the ground layer consists predominately of a dense layer of dead and decaying conifer leaf litter. Narrow verges of semi-natural wet grassland (GS4; as described below) also persist along drainage channels adjacent to the conifer plantation.

Commercial conifer plantations are highly modified habitat types which are species poor and dominated by uniform stands of commercial timber species (e.g. Sitka Spruce) and, as such, are of Local importance (lower value).

## Treelines (WL2)

**Plate 5.4: Treelines (WL2)**

Treeline habitat (WL2) occurred in places within the study area, albeit hedgerows were largely low growing. The main concentrations of treelines were recorded in the northeastern part of the wind farm site largely around farm settlements or along farm tracks and public roads.

Species assemblage consisted of frequently occurring mature Whitethorn, occasionally occurring Beech, Sycamore, Holly, Ash and rarely occurring Horse chestnut *Aesculus hippocastanum*. The shrub layer was composed of frequent Ivy, Bramble and Gorse with occasional Honeysuckle and Dog rose. Moss cover was high on the more shaded banks of the treeline habitats leading to the old farmstead in the northeast of the site and included species such as *Thuidium tamarascum*, *Polytrichum commune* and *Dircranium* spp. The broadleaved component consisted of frequently occurring Soft shield fern *Polystichum setiferum*, Male fern *Dryopteris filix-mas*, Broad buckler fern *Dryopteris dilatata* and Black spleenwort *Asplenium adiantum-nigrum*. Other herbaceous plants present included frequent Common dog violet *Viola riviniana*, Bugle *Ajuga reptans*, Red fescue *Festuca rubra*, Creeping bent and occasional Foxglove *Digitalis purpurea*, Bramble, Marsh bedstraw *Galium palustre*, Germander speedwell *Veronica chamaedrys*, Sweet vernal grass *Anthoxanthum odoratum*, Yorkshire fog *HoLCus lanatus* and Cocksfoot *Dactylis glomerata*.

Treelines are evaluated as Local Importance (Higher value). The treelines connect patches of woodland and/or scrub, forming an important network of connections between habitats. In addition, as with hedgerows, treelines also provide foraging,

shelter and commuting opportunities for a range of fauna including insects, bats and birds as well as nesting opportunities for birds.

#### Mixed Broadleaved Woodland (WD1)

Small fragments of mixed broadleaved woodland were found throughout the study area along the margins of conifer plantation, in the north of the wind farm site surrounding old farm sheds and to the northwest of the site along the Knocknabranagh & Knockbaun Stream. Species within the mixed broadleaved woodland largely consisted of frequent Grey willow, Ash, Alder and occasional Sycamore. Ground flora consisted of grasses such as frequent Yorkshire fog, Creeping bent and False oat grass with occasional Common rush, nettles and brambles.

The mixed broadleaved woodland, while limited in extent and fragmented in nature, is evaluated as Local Importance (Higher value) due to its value in supporting local biodiversity.

#### Recently Felled Woodland (WS5)

Recently felled woodland was located in the west of the wind farm site within the commercial conifer plantation. Rosebay willow herb was abundant where felling had occurred along with Common rush and False oat grass.

The recently felled woodland is evaluated as Local Importance (Lower value) due to its highly managed and disturbed nature.

#### Immature Woodland (WS2)

Immature woodland was located in the west of the wind farm site amongst the conifer plantation where the forestry crop had been felled and newly planted Sitka Spruce saplings had been planted. Ground flora consisted of frequent Rosebay Willowherb, Nettle and Bramble.

The immature woodland is evaluated as Local Importance (Lower value) due to the highly managed nature of the commercial forestry works.

### Wet Grassland (GS4)



**Plate 5.5: Wet Grassland (GS4)**

Wet Grassland (GS4) is described as wet or waterlogged mineral or organic soils that are poorly-drained or, in some cases, subjected to seasonal or periodic flooding. On sloping ground, wet grassland is mainly confined to clay-rich gleys and loams, or organic soils that are wet but not waterlogged. In the study area, Wet Grassland (GS4) habitat type occurred largely in the north central and western part of the site where the Knockbrannagh and Knockbaun stream runs. Several man-made drains for agriculture and forestry have been cut along the perimeter of the fields in this area however the vegetation indicates that ground conditions are still moist. Many of the wet grassland fields appear to have been improved but are reverting to a more semi-improved wet grassland type due to the moist ground conditions. The habitat is composed of abundant Soft rush *Juncus effusus* and frequently occurring Creeping buttercup, White clover, Yorkshire fog, Crested dogs tail, Creeping bent, Common sorrel, Broad leaved Dock, Creeping bent. Occasionally occurring species included Sharp-flowered rush *Juncus acutiflorus*, Cuckoo flower *Cardamine pratensis*, Common mouse ear *Cerastium fontanum*, Meadow buttercup, Coltsfoot *Tussilago farfara*, Sweet vernal grass, Selfheal *Prunella vulgaris*, Marsh thistle *Cirsium palustre* and Catsear *Hypochaeris radicata*.

Wet Grassland located at the site of the proposed turbine T3 had a higher ecological value than other wet grassland areas due to the diversity and abundance of species within the grassland sward. This area is approaching Annex I Molina meadows status with good representation of positive indicator species for this Annex I habitat. The grassland sward at the location of T3 included an abundance of wetland moss *Calliergonella cuspidata* (Pointed Spear-moss) within the ground layer. The grassland sward is composed of abundant Yorkshire Fog frequent Sharp-flowered rush, Tufted-hair grass *Deschampsia cespitosa*, Creeping bent, Red fescue and a number of sedges including Glaucus Sedge *Carex flacca*, Star sedge *Carex echinata*, Oval sedge *Carex leporina*. Occasional species included Sweet vernal grass, Tormentil

*Potentilla erecta*, Marsh thistle, Meadow buttercup, Common sorrel, Molinia *Molinia caerulea*. A wetter area within the same field contained frequently occurring Marsh cinquefoil *Comarum palustre* with occasional Marsh willowherb *Epilobium palustre*, Creeping buttercup, Tormentil, Star sedge, Oval Sedge Tufted-hair grass and Marsh speedwell. Clumps of immature willow *Salix cinerea* were also recorded rarely. A similar higher value type wet grassland was also recorded on either side of the Knockabrannagh and Knockbaun stream in the northwest of the wind farm site.

Wet Grassland (GS4) habitat located within the study area is evaluated as being of Local Importance (Higher Value). It is locally important for biodiversity as much of the surrounding grasslands have been converted to improved agricultural grassland. Wet grasslands and the water features (drains, water filled hollows) within this habitat provide important habitat for amphibians and invertebrates, which in turn provide food for breeding birds and their chicks, as well as bat species. The field where turbine T3, and its associated crane hardstanding and access track; will be located is a wet grassland type that is considered of higher ecological value due to the greater variety and type of species present. The species recorded here were also positive indicators for the Annex I grassland *Molinia* Meadows or 6410 *Molinia* meadows on calcareous, peaty or clayey silt laden soils (*Molinion caeruleae*). A similar habitat of high value wet grassland is also present along both sides of the stream in the northwest of the site.

#### Dry Meadows and Grassy Verges (GS2)



**Plate 5.6: Dry Meadows and Grassy Verges (GS2) habitat; Common Blue butterfly on Common knapweed**

Dry meadows that are rarely fertilised or grazed and are mown only once or twice per annum and can be seen most commonly on grassy roadside verges. Within the study area, the habitat was recorded along the coniferous forestry tracks and margins of the farm tracks. Species included grasses such as the frequently occurring Cocksfoot, Yorkshire fog, False oat grass and broadleaved plants such as Common knapweed and occasional Common birds foot trefoil, Eyebright, Marsh thistle, Rosebay-Willowherb, White clover, Red Clover, Selfheal and Ragwort.

The Dry Meadows and Grassy Verge (GS2) habitat is evaluated as being of Local Importance (Higher Value) due to the range of flowering plant species present in this habitat which are beneficial to local invertebrates and, in turn, are important components which support local biodiversity.

### Eroding Upland Rivers (FW1)



**Plate 5.7: Eroding Upland River (FW1)**

2 no. main streams flow through the study area; the Knocknabranagh & Knockbaun Stream and the Coolcullen Stream. The streams drain in a northerly direction and join together (Coolcullen River) before flowing into the River Dinin (South) which is itself a tributary of the River Nore and forms part of the River Barrow and River Nore SAC (002162). The streams are small in size, c. 1-3m wide, and shallow, c. 10-60cm of water.

In the north centre of the site between T5 and T6 where a crossing of the Knocknabranagh and Knockbaun Stream is located, the stream runs through coniferous forestry plantation. Tree planting has not taken place within 10m on either side resulting in a wet grassland type habitat on the banks of the stream at this location. The base of the stream here is composed of cobble gravel substrate. Instream flora was rare and included the aquatic moss *Fontinalis antipyretica* located on stones and rocks. Other plant species present on the stream banks included frequent Tufted hair grass, Yorkshire fog, Sharp-flowered rush, Soft rush with occasional Meadowsweet *Filipendula ulmaria*, Tormentil, Marsh woundwort *Stachys palustris*, Bramble, Creeping buttercup and rarely occurring Lesser stitchwort *Stellaria graminea* and Bitter vetch *Lathyrus linifolius*. This stream bank vegetation is considered to be wet grassland of high ecological value due to the variety of species present.

Further east, the Coolcullen Stream runs through improved agricultural grassland. At this location, the instream flora was more plentiful with frequent Water cress, Floating sweet grass *Glyceria fluitans* Round leaved water crowfoot *Ranunculus omiophyllus* and occasional Water figwort *Scrophularia auriculata*, Hemlock water dropwort *Oenanthe crocata*. Bankside vegetation included frequent Yorkshire fog, Bramble, Meadowsweet, Soft rush, Gorse and Nettle *Urtica dioeca* with occasional Marsh woundwort and Angelica *Angelica sylvestris*. Cattle poaching and access to the Coolcullen Stream was evident in places. A ford is present in the north of the site where this stream crosses over a farm track.

The Upland Eroding River habitat is evaluated as being of Local Importance (Higher Value). While small in size, these linear aquatic and wetland habitats support specialist aquatic plant communities which enhance local biodiversity and function as eco-corridors. They also provide habitat to support amphibians and invertebrates, which in turn provide food for birds and their chicks as well as other fauna such as bat species. Eroding Upland Rivers can support habitat which corresponds to the EU Habitats Directive Annex I watercourses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation (3260); however the streams within the study area do not support this Annex I habitat type.

#### Drainage Ditch (FW4)



**Plate 5.8: Drainage ditch (FW4)**

A network of drainage ditches have been installed along the majority of the field boundaries across the study area as part of drainage measures for agricultural land improvements and for commercial afforestation. Many of the drains were dry and overgrown or had a muddy base with species assemblage composed of grasses such as the frequently occurring Yorkshire fog, Cocksfoot, Soft rush and Creeping buttercup with occasional Bramble, Rosebay willowherb, Marsh thistle, Tufted-hair grass, Aquatic ragwort and Nettle. In more moist drains, Round-leaved water crowfoot and Floating sweet grass were recorded.

The Drainage Ditch habitat is evaluated as being of Local Importance (Lower Value). While these habitats are valuable in supporting aquatic flora and fauna, they are routinely cleared and, due to the disturbed nature of the habitat, they are classified as being of local importance with lower ecological value.

### Scrub (WS1)



**Plate 5.9: Scrub (WS1)**

Scrub is a habitat type dominated by at least 50% cover of shrubs, stunted trees or brambles. The canopy height is generally less than 5m, or 4m in the case of wetland areas. Scrub habitat was recorded within the study area near the site entrances in the northeast of the wind farm, along margins and firebreaks of coniferous forest plantation and within the proposed borrow pit to the northeast of the wind farm. Species recorded within the scrub habitat included frequently occurring Grey willow, Gorse, Bramble, Blackthorn and Hawthorn. Herbaceous species included frequently occurring Yorkshire fog, Marsh thistle, Nettle, Creeping bent, occasionally occurring Devils bit scabious *Succisa pratensis* and rarely occurring Broom *Cytisus scoparius*.

The Scrub habitat is evaluated as being of Local Importance (Lower Value) as it is limited in extent. However, scrub is an important breeding and foraging habitat for birds and other fauna and supporting local biodiversity in general and should be retained where possible.

### Exposed Siliceous Rock (ER1)

A small area of exposed rock was recorded within a former quarry (now proposed as a borrow pit) in the northeast of the wind farm site. This area is now mostly overgrown, with Wet Grassland (GS4) and Scrub (WS1) habitat dominating. Mosses such as Pointed-spear moss *Calliergonella cuspidata* and *Fiscidians* spp. occasionally occurred. The lichen *Ochrolechia parella* was also growing on the rock face. Plant species colonising crevices in the rock face included Ox-eye daisy, Red fescue and Creeping bent grass.

Exposed Siliceous Rock is evaluated as being of Local Importance (Lower Value).



**Plate 5.10: Exposed Siliceous Rock (ER1)**

#### Spoil and Bare Ground (ED2)

The spoil and bare ground habitat (ED2) was largely located along the extensive network of farm and forestry tracks that are located throughout the study area. This bare ground area consisted of mud tracks or tracks with hardcore gravel laid along them. In places, the tracks had a strip of low growing vegetation running along the centre including frequent Yorkshire fog, Creeping bent, Annual meadow grass, Dandelion and Daisy. The majority of the access tracks present are regularly maintained/disturbed; and, due to the level of management and/or disturbance, there is little or no vegetation present on the main tracks. However, along track edges, which are subjected to less ongoing disturbance, vegetation has begun to recolonise in parts forming Dry Meadows and Grassy Verges (GS2) habitat type.



**Plate 5.11: Spoil and bare ground (ED2) along existing forestry track**

The Spoil and Bare Ground habitat present is a modified habitat type persisting as a result of resurfacing works and or ongoing maintenance (**Plate 5.11**). However, where vegetation has begun to re-establish (e.g. Recolonising Bare Ground (ED3)); along the centre and edge of tracks or in areas subject to lower disturbance levels; opportunities for wildflowers and plants of pollinator value to grow are introduced including occasionally occurring Common Knapweed, Common birds-foot trefoil, Pine-apple weed, Daisy and Colts-foot.

The Spoil and Bare Ground habitat is evaluated as being of Local importance (Lower value) ecological value.

## Stone Walls and Other Stonework (BL1)



**Plate 5.12: Stone Walls and Other Stonework (BL1)**

This category incorporates stone walls and most other built stone structures in rural and urban situations, apart from intact buildings (Fossitt, 2000).

A number of stonewall house structures were clustered in the north of the study area at an old farmstead with an old dwelling and farm buildings. The structures here are stone built with corrugated rooves some of which have collapsed in some of the buildings. Plant species colonising the old stone walls included frequent Ivy and Polypodium fern which was growing on the old wall tops in dense stands and occasional Bramble, Nettle, Herb Robert, Maiden-hair Spleenwort *Asplenium trichomanes* and the *Brachythecium* moss species. The yellow lichen *Xanthoria parietina* was also growing on the stone walls.

The stone walls and ruined buildings are evaluated as being of Local Importance (Higher Value) as the structures provide cover, shelter and potential nesting and foraging opportunities for a range of species including birds, bats and invertebrates.

### Non-native Invasive Species

2 no. non-native invasive plant species (see **Table 5.12**), Sycamore *Acer pseudoplatanus* and *Montbretia* were recorded within the study area. Both of these species are classified as being of medium and low invasive species. With regards to Sycamore, there has been more recent discussion on whether Sycamore may now be considered as an archaeophyte here (i.e. ancient introductions; see Stolze & Monecke 2017).

Common Name	Scientific Name	Listed in Third Schedule Part I * (Y/N)	Risk Rating (Kelly <i>et al.</i> , 2013) and/or NBDC Risk rating
Sycamore	<i>Acer pseudoplatanus</i>	N	Medium
Montbretia	<i>Crocsmia x crocosmiiflora</i>	N	Low

**Table 5.12: Non-native Invasive Species Recorded and their risk rating according to NBDC and Kelly *et al.*, (2013)**

### Habitats along the Grid Connection Route

Most of the circa 15km grid connection route follows public roads (i.e. buildings and artificial surfaces habitat (BL3) between the wind farm site and Kilkenny 110kV substation; with works to be undertaken within the paved surface.

Habitats present within the grid connection route or immediately adjacent to the works footprint include roads (BL3), roadside verges (i.e. dry meadow and grassy verge GS2) and stone walls and other stonework (BL1) (i.e. bridges), improved agricultural grassland (GA1), conifer plantation (WD4), Scrub (WS1), Arable crops (BC1), Mixed broadleaved woodland (WD1), hedgerows (WL1) and/or treelines (WL2) and residential properties (i.e. buildings and artificial surfaces (BL3), amenity grassland (GA2), and non-native shrubberies (WS3) etc.).

As the grid connection infrastructure will be buried within the paved surface, the habitats and plants adjoining the road will be undisturbed.

Horizontal Directional Drilling (HDD) will occur at 3 no. locations along the grid connection route. The HDD will be required to avoid trenching/excavations within bridging structures which traverse 2 no. unnamed local watercourses, and the Kilderry stream. Launch and receptor pits will be excavated at either side of the crossings to accommodate the drilling rig.

No Third Schedule non-native invasive species were recorded along the grid connection route when surveyed in June 2021. The 3 no. HDD crossing locations on and the works areas on the turbine component haul route were revisited in April, May and August 2022 as part of a baseline assessment of potential ecological constraints. No Third Schedule Invasive species were recorded at these sites.

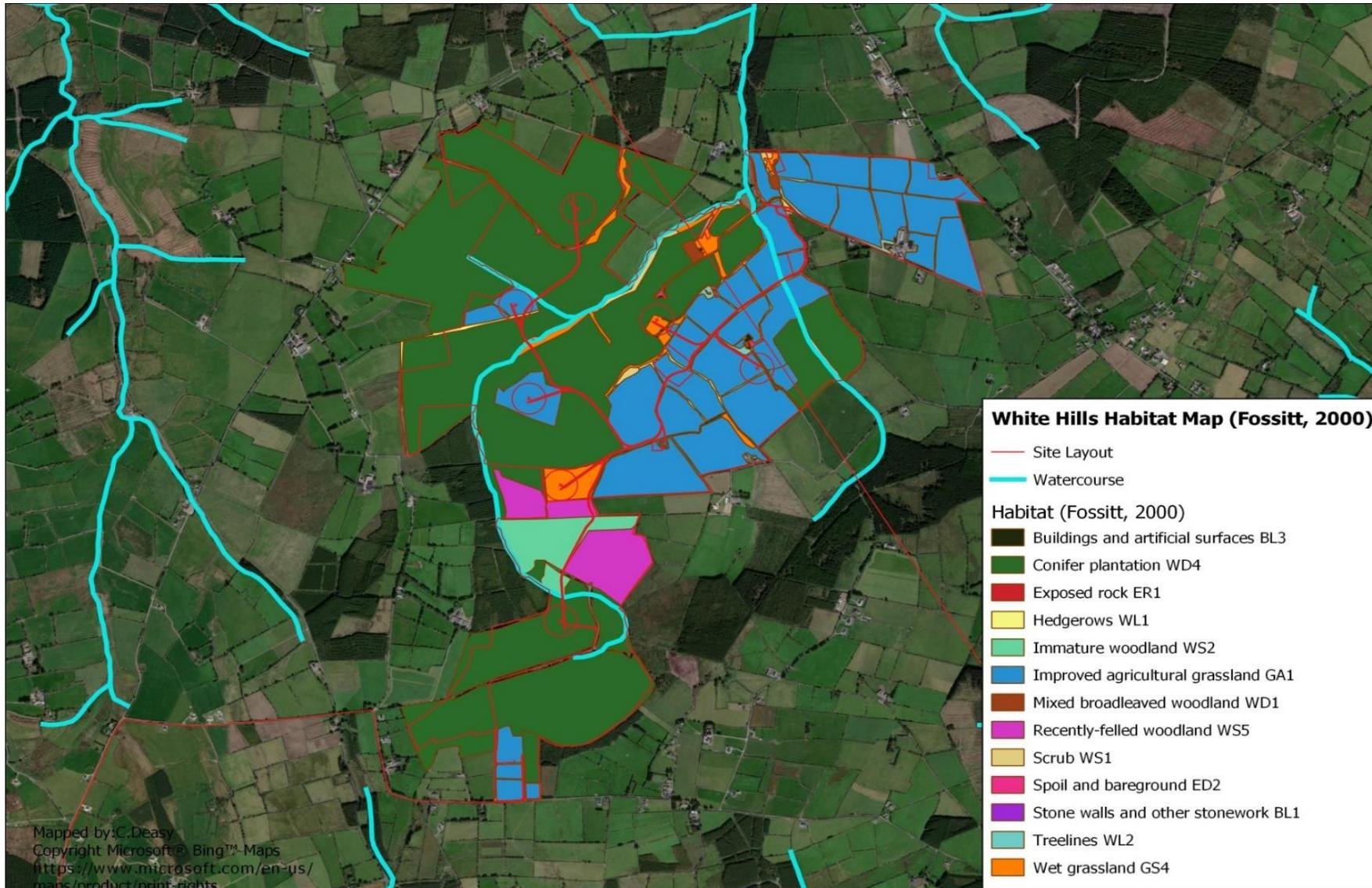


Figure 5.12: Habitat Map (Fossitt, 2000) of the Study Area

## Replant Lands

The forestry replant lands were surveyed on 8 March 2022.

The dominant habitat present is improved agricultural grassland (GA1). Other habitats include, hedgerow (WL1), drainage ditches (FW4) and treelines (WL2).

Areas of GA1 contained species commonly found in this habitat type such as Ryegrasses (*Lolium* spp.) Clovers (*Trifolium* spp.) and Dandelions (*Taraxacum* spp.). WS1 occurs in mosaic with the GA1 habitats in the southern portion of the site, mostly dominated by Gorse (*Ulex europaeus*).

The hedgerows and treeline habitats were comprised of mostly native or naturalised species such as Ash, Hawthorn (*Crataegus mongyna*), Holly (*Ilex aquifolium*), Sycamore (*Acer pseudoplatanus*) and Beech (*Fagus sylvatica*), with understories of Ivy (*Helix hederata*) and Bramble (*Rubus fruticosus* agg.).

No evidence of burrows or resting places associated with protected mammal species (e.g. Badger Setts) was found. Frog Spawn was present in some ponding areas on site and in drainage ditches. No significant watercourses are present on site, and drainage is provided by man-made ditches within some field boundaries.

The replant lands are intensively managed at present. Areas of hedgerow (WL1) and treelines (WL2) support some local biodiversity, The site relatively intensively managed and contains some seminatural features which are common in a local context, the site overall is considered to be of local importance, lower value.

### 5.3.3 Birds

#### 5.3.3.1 Vantage Point Surveys

3 no. winter and 2 no. breeding VP survey seasons were completed by March 2022. This provides a greater amount of seasonal coverage than the minimum 2-years of survey data recommended in the SNH Guidelines (SNH, 2017). For the 2020 and 2021 breeding and 2020/2021 and 2021/2022 winter survey season, the minimum recommended survey coverage of 36-hours observations per VP was achieved. In the first winter survey period, the observations began in November and 30-hours coverage per VP was achieved. **Annex 5.1** provides the details of the survey schedule and weather details for each of the survey visits.

#### Winter Season 2019/2020

A total of 118 no. flightlines of target bird species were recorded between November 2019 and March 2020 (**Annex 5.3**). **Table 5.13** summarises the cumulative total of time each species was observed within and outside of the application site.

5 no. species of raptor were recorded during this winter VP survey, with an additional species recorded and identified as a probable Goshawk, *Accipiter gentilis*. The bulk of the raptor sightings were Buzzard, *Buteo buteo* (44 no. flightlines) and Kestrel, *Falco tinnunculus* (42 no. flightlines). Sparrowhawk, *Accipiter nisus* (15 no. flightlines) was also fairly regularly recorded.

There were 2 no. sightings of 'Ringtail' (Female/Immature bird) Hen Harrier, *Circus cyaneus* during the VP watches. Both of these sightings were made on the 11 December 2019 and are likely to have involved the same bird. There was 1 no. additional sighting of a Ringtail made on 15 January 2020, as the observer made his way back to his vehicle from VP2 at the end of his watch. Hen Harriers, particularly female and juvenile birds, are highly mobile outside of the breeding season and may

be recorded in areas distant from preferred breeding and wintering habitats during this time of year (O'Donoghue 2021).

The only other raptor species recorded during the winter VPs in 2019/2020 was a single observation of Peregrine Falcon, *Falco peregrinus*.

Buzzards were frequently observed circling and soaring above the study area and this typical flight behaviour explains the duration of time the species was observed in flight over the application site (over 38-minutes) and outside of the wind farm site (over 77-minutes). Kestrels, were mostly observed hunting and commuting outside of the wind farm site with a relatively short time spent within the wind farm site (c. 5-minutes). Hen Harrier was only present within the wind farm site for a total of 1-minute and Peregrine Falcon did not occur within the application site during the winter VP watches in 2019/2020.

10 no. flightlines were observed for Golden Plover, *Pluvialis apricaria*, with the largest flock of this wintering wader observed being c. 300 no. birds, seen on 29 November 2019. Golden Plovers were observed circling and commuting widely across the areas under observation. Flocks were present in flight for over 50-minutes of total observation time, but only 2-minutes 10-seconds of this time was spent within the wind farm site.

The only other wading bird recorded was Snipe, *Gallinago gallinago*, with 1 no. flightline noted. This bird did not overfly the wind farm site. There was also 1 no. sighting of a Lesser Black-backed Gull, *Larus fuscus*, in flight; but the bird did not overfly the wind farm site.

Great Spotted Woodpecker, *Dendrocopus major*, a recent colonist, was recorded on several occasions and from several of the VP locations.

Winter Season 2019/2020 - 118 no. flightlines			
Species	No. of flightlines	Duration On-site (s)	Duration Off-site (s)
Raptors			
Buzzard	44	2305 [38min 25s]	4650 [1hr 17min 30s]
Kestrel	42	310 [5m 10s]	4785 [1hr 19min 45s]
Sparrowhawk	15	160 [2min 40s]	570 [9min 30s]
Hawk (possible Goshawk)	2	30 [30s]	110 [1min 50s]
Hen Harrier	2	60 [1min 0s]	60 [1min 0s]
Peregrine FalCon	1	0	45 [45s]
Waders			
Golden Plover	10	130 [2min 10s]	2955 [49min 15s]
Snipe	1	0	70 [1min 10s]
Waterbirds			
Lesser Black-backed Gull	1	0	70 [1min 10s]

**Table 5.13: Winter Season 2019/2020 Flightline Summary**

The flightline descriptions are summarised at **Annex 5.3**. The associated flightline mapping is presented in **Annex 5.3** with each flightline marked with the corresponding Flightline ID from the tables provided.

The overall bird species recorded as casual observations by the VP observers during this winter period is summarised in **Table 5.14**.

Species	Species
Blackbird	Lesser Black-backed Gull
Blue Tit	Linnet
Bullfinch	Long-tailed Tit
Buzzard	Magpie
Chaffinch	Meadow Pipit
Coal Tit	Mistle Thrush
Collared Dove	Peregrine Falcon
Dunnock	Pheasant
Feral Pigeon	Pied Wagtail
Fieldfare	Raven
Goldcrest	Redwing
Golden Plover	Reed Bunting
Goldfinch	Robin
Great Spotted Woodpecker	Rook
Great Tit	Siskin
Greenfinch	Skylark
Grey Wagtail	Snipe
Hen Harrier	Song Thrush
Herring Gull	Sparrowhawk
Hooded Crow	Starling
House Sparrow	Stonechat
Jackdaw	Woodpigeon
Jay	Wren
Kestrel	

**Table 5.14: Casual Bird Observations during Winter Season 2019/2020**

#### Breeding Season 2020

A total of 142 no. flightlines of target bird species were recorded between March 2020 and August 2020 (**Annex 5.3**). **Table 5.15** summarises the cumulative total of time each species was observed within and outside of the wind farm site.

3 no. species of raptor were recorded during the breeding season VP survey. One species dominated the sightings with a total of 108 no. flightlines of Buzzard recorded during this period. Display flights, circling and soaring were commonly observed. Several individuals were present with observations of up to 3 no. birds flying together noted. Buzzard adults and young were recorded confirming local breeding pairs. Of the flightlines observed Buzzards were seen over the wind farm site for over 78-minutes cumulatively during the 2020 breeding season period. As can be inferred from the

flightlines, the bulk of the observations of Buzzards were of birds flying outside of the wind farm site (total time over 4-hours).

There were a small number of flightlines of Kestrel and Sparrowhawk noted during the 2020 breeding season (**Annex 5.3**). In total, Kestrel were present over the wind farm site for only 50-seconds and Sparrowhawk for 165-seconds.

There were 7 no. flightlines noted for Golden Plover. All of these observations were made in April 2020. Highly mobile flocks were recorded, with the largest flock noted being of 269 no. birds (**Annex 5.3**). A number of the flightlines crossed the wind farm site, with Golden Plovers spending a total of 14-minutes and 5-seconds over the site during the summer VP survey.

There were 2 no. sightings of commuting Curlew, *Numenius arquata*. Both were sightings of commuting single individuals, the first in May and the second in July 2020. The birds passed through the observation area but did not overfly the wind farm site (**Annex 5.3**).

Lesser Black-backed Gulls (4 no. flightlines) and Herring Gull (1 no. flightline) were observed with Lesser Black-backed Gulls recorded overflying the wind farm site (**Annex 5.3**). There were also several flightlines recorded of Grey Heron, *Ardea cinerea* during the 2020 breeding VP surveys. Grey Heron was recorded overflying the wind farm site for a total of 40-seconds during the 2020 breeding season observation period.

The associated flightline mapping for this period is presented in **Annex 5.3** with each flightline marked with the corresponding flightline ID from the corresponding table for this survey season also provided in **Annex 5.3**.

The overall bird species recorded as casual observations by the VP observers during this winter period is summarised in **Table 5.16**. The bird species recorded were typical of the farmland and conifer plantation habitats that dominate the local landscape. The common resident species were augmented by summer migrants including Cuckoo, *Cuculus canorus*, House Martin, *Delichon urbicum* and Swallow, *Hirundo rustica*.

Breeding Season 2020 - 142 no. flightlines			
Species	No. of flightlines	Duration On-site (s)	Duration Off-site (s)
Raptors			
Buzzard	108	4720 [1hr 18min 40s]	14625 [4hr 3min 35s]
Kestrel	8	50 [50s]	225 [3min 45s]
Sparrowhawk	8	165 [2min 45s]	285 [4min 45s]
Waders			
Golden Plover	7	845 [14min 5s]	400 [6min 40s]
Curlew	2	0	65 [1min 5s]
Waterbirds			
Lesser Black-backed Gull	4	225 [3min 45s]	425 [7min 5s]
Herring Gull	1	0	20 [20s]
Grey Heron	4	40 [40s]	165 [2min 45s]

**Table 5.15: Breeding Season 2020 Flightline Summary**

Species	Species
Blackbird	Lesser Black-backed Gull
Blackcap	Lesser Redpoll
Blue Tit	Linnet
Bullfinch	Magpie
Buzzard	Meadow Pipit
Chaffinch	Mistle Thrush
Chiffchaff	Pheasant
Coal Tit	Pied Wagtail
Collared Dove	Raven
Crossbill	Redwing
Cuckoo	Reed Bunting
Curlew	Robin
Duncock	Rook
Feral Pigeon	Sand Martin
Fieldfare	Siskin
Goldcrest	Skylark
Golden Plover	Song Thrush
Goldfinch	Sparrowhawk
Great Tit	Starling
Grey Heron	Stock Dove
Grey Wagtail	Stonechat
Herring Gull	Swallow
Hooded Crow	Swift
House Martin	Tree Sparrow
House Sparrow	Whitethroat
Jackdaw	Willow Warbler
Jay	Woodpigeon
Kestrel	Wren

**Table 5.16: Bird Observations during 2020 Breeding Season**

#### Winter Season 2020/2021

A total of 186 no. flightlines of target bird species were recorded between October 2020 and March 2021. **Table 5.17** summarises the cumulative time each species was observed within and outside of the application site.

4 no. raptor species were recorded during this winter VP survey. All four species, Buzzard, Kestrel, Sparrowhawk and Peregrine Falcon had also been recorded at the site in the previous winter VP period. Consistent with the results of the previous winter,

2 no. species dominated the sightings, Buzzard (50 no. flightlines) and Kestrel (45 no. flightlines).

Sparrowhawk (23 no. flightlines) was recorded more often than in the previous winter period and display flight (courtship) was recorded on several occasions.

The only other raptor species recorded during the winter VPs in 2020/2021 was 2 no. observations of Peregrine Falcon, neither flightline over the wind farm site.

As in the previous winter period, Buzzards were recorded widely across the study area. Circling and soaring flights were common and interactions between multiple individuals was noted. Cumulatively, Buzzards were observed in flight for c. 83-minutes, with a little over 20-minutes of these observations made of birds within the wind farm site.

Kestrels were also observed frequently, although few flights crossed the wind farm site. This was also consistent with the previous winter's observations. Sparrowhawk spent a greater cumulative period flying within the wind farm site (over 9-minutes).

The most notable difference between the observations made in winter 2020/2021 and the previous winter period was the number of flightlines recorded of Golden Plover. Wintering flocks of Golden Plover are highly mobile and their numbers can fluctuate significantly inter-annually (e.g. Gillings & Fuller, 1999). Interestingly, the observations were concentrated in the early and late winter periods, with 34 no. of the flightlines recorded in the October-November VP watches and 18 no. of the flightlines observed in March 2021. No Golden Plover flightlines were recorded at the site in January or February 2021. This pattern of occasional occurrence is not unusual for this highly mobile, flocking species. In total, Golden Plovers were recorded for almost 10.5-hours, nearly 2-hours of which the birds were overflying the wind farm site.

There were 7 no. flightlines recorded of Snipe, with observations of small numbers of commuting birds most likely on passage migration, in October 2020. Cumulatively, these birds were only recorded overflying the wind farm site for 1-minute 35-seconds (**Annex 5.3**).

Flightlines were recorded of 2 no. waterbird species, Herring Gull (1 no. flightline) and Grey Heron (5 no. flightlines). The observations of both species were brief and Herring Gull did not overfly the wind farm site.

Winter Season 2020/2021 - 186 no. flightlines			
Species	No. of flightlines	Duration On-site (s)	Duration Off-site (s)
Raptors			
Buzzard	50	1,205 [20min 5s]	3,761 [1hr 2min 41s]
Kestrel	45	50 [50s]	4,650 [1hr 17min 30s]
Sparrowhawk	23	550 [9min 10s]	515 [8min 35s]
Peregrine Falcon	2	0	100 [1min 40s]
Waders			
Golden Plover	53	7,100 [1hr 58min 20s]	30,265 [8hr 24min 25s]
Snipe	7	95 [1 min 35s]	300 [5min 0s]
Waterbirds			
Herring Gull	1	0	40 [40s]

**Winter Season 2020/2021 - 186 no. flightlines**

Grey Heron	5	80 [1min 20s]	95 [1min 35s]
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**Table 5.17: Winter Season 2020/2021 Flightline Summary**

The flightline descriptions are summarised in **Annex 5.3**. The associated flightline mapping for this season is also presented in **Annex 5.3** with each flightline marked with the corresponding flightline ID.

The overall bird species recorded as casual observations by the VP observers during this winter period is summarised in **Table 5.18**.

The species mix is again typical of the range of habitats present in the study area, with a variety of farmland and woodland birds represented. Winter migrant thrushes, Redwing, *Turdus iliacus* and Fieldfare, *Turdus viscivorus* were common and widespread at the wind farm site.

A less common passerine species, Tree Sparrow, *Passer montanus*, was recorded in several months from VP5 and VP6.

Species	Species
Blackbird	Linnet
Blue Tit	Long-tailed Tit
Bullfinch	Magpie
Buzzard	Meadow Pipit
Chaffinch	Mistle Thrush
Coal Tit	Peregrine Falcon
Collared Dove	Pheasant
Dunnock	Pied Wagtail
Feral Pigeon	Raven
Fieldfare	Redwing
Goldcrest	Reed Bunting
Golden Plover	Robin
Goldfinch	Rook
Great Spotted Woodpecker	Siskin
Great Tit	Skylark
Greenfinch	Snipe
Grey Heron	Song Thrush
Grey Wagtail	Sparrowhawk
Herring Gull	Starling
Hooded Crow	Stonechat
House Sparrow	Tree Sparrow
Jackdaw	Woodpigeon
Jay	Wren

Species	Species
Kestrel	Yellowhammer
Lesser Redpoll	

**Table 5.18: Bird Observations during Winter Season 2020/2021**

### Breeding Season 2021

A total of 221 no. flightlines of target bird species were recorded between March 2021 and August 2021 (**Annex 5.3**). **Table 5.19** summarises the cumulative total of time each species was observed within and outside of the application site.

5 no. species of raptor were recorded during the breeding season VP survey. As in previous survey seasons at this site, Buzzard dominated the sightings with a total of 155 no. flightlines recorded during this period. Buzzard adults and young were recorded confirming local breeding pairs. Regular interactions between pairs of Buzzard were observed and circling and soaring birds were observed widely across the entire study area. Buzzards flightlines cumulatively accounted for over 76-minutes of flightline observations over the application site during the summer VP period. Buzzards were observed off-site for over 3.5-hours during these VP watches.

Kestrel was the next most frequently recorded target species in this breeding season period (21 no. flightlines). However, as in previous survey seasons, very little of the time when these birds were under observation was spent within the wind farm site (2-minutes 45-seconds).

A total of 14 no. flightlines were recorded for Sparrowhawk in this breeding season. It is likely that a pair bred locally based on the observations made during this breeding season. The cumulative duration spent overflying the site was under 5-minutes (**Table 5.19**).

The other 2 no. raptor species recorded during the 2021 breeding season VP surveys were Peregrine Falcon (1 no. flightline) and Hen Harrier (1 no. flightline). The sighting of Hen Harrier was of a Ringtail on the 13 August 2021. This is a time of year when Hen Harriers are post-breeding; and adults and young birds disperse from breeding grounds. In late summer, Hen Harrier are frequently recorded passing through areas where there is no resident breeding population (pers obs.).

The 4 no. flightlines noted for Golden Plover were all recorded early in the season, in March 2021. A number of the flightlines crossed the wind farm site, with Golden Plovers spending a total of 4-minutes 50-seconds over the site during the summer VP survey (**Table 5.19**).

Lesser Black-backed Gulls (21 no. flightlines) and Grey Heron (4 no. flightlines) were the other target species recorded during this summer period (**Table 5.19; Annex 5.3**). Commuting Lesser Black-backed Gulls were recorded during the May and June surveys. These Gulls frequently occur inland during the summer months, particularly associated with feeding opportunities in silage fields and during agricultural ploughing. Relatively small numbers of birds were recorded (largest flock comprised 9 no. birds).

The associated flightline mapping for this period is presented in **Annex 5.3** with each flightline marked with the corresponding flightline ID.

Breeding Season 2021 - 221 no. flightlines			
Species	No. of flightlines	Duration On-site (s)	Duration Off-site (s)
Raptors			
Buzzard	155	4,560 [1hr 16min 0s]	12,855 [3hr 34min 15s]
Kestrel	21	165 [2min 45s]	980 [16min 20s]
Sparrowhawk	14	280 [4min 40s]	560 [9min 20s]
Hen Harrier	1	45 [45s]	45 [45s]
Peregrine Falcon	1	0	30 [30s]
Waders			
Golden Plover	4	290 [4min 50s]	180 [3min 0s]
Waterbirds			
Lesser Black-backed Gull	21	455 [7min 35s]	815 [13min 35s]
Grey Heron	4	5 [5s]	170 [2min 50s]

**Table 5.19: Breeding Season 2021 Flightline Summary**

The overall bird species recorded as casual observations by the VP observers during this summer period is summarised in **Table 5.20**.

The species mix is typical of the range of habitats present in the study area, with a variety of farmland and woodland birds represented. The resident species were augmented by summer migrants including Sand Martin, *Riparia riparia* and Swift, *Apus apus*. Great Spotted Woodpecker were heard and seen regularly.

Species	Species
Blackbird	Lesser Redpoll
Blackcap	Linnet
Blue Tit	Long-tailed Tit
Bullfinch	Magpie
Buzzard	Meadow Pipit
Chaffinch	Mistle Thrush
Chiffchaff	Pheasant
Coal Tit	Pied Wagtail
Crossbill	Raven
Cuckoo	Redwing
Dunnock	Reed Bunting
Feral Pigeon	Robin
Fieldfare	Rook
Goldcrest	Sand Martin
Golden Plover	Siskin
Goldfinch	Skylark

Species	Species
Great Spotted Woodpecker	Song Thrush
Great Tit	Sparrowhawk
Greenfinch	Starling
Grey Heron	Stonechat
Grey Wagtail	Swallow
Hen Harrier	Swift
Hooded Crow	Tree Sparrow
House Martin	Whitethroat
House Sparrow	Willow Warbler
Jackdaw	Woodpigeon
Kestrel	Wren
Lesser Black-backed Gull	

**Table 5.20: Bird Observations during 2021 Breeding Season**

#### Winter Season 2021/2022

A total of 202 no. flightlines of target bird species were recorded between October 2021 and March 2022). **Table 5.21** summarises the cumulative time each species was observed within and outside of the application site.

4 no. raptor species were recorded during this winter VP survey, the same species that were recorded at the study area in the previous winter. In line with each of the previous two winter survey seasons, the flightline observations were dominated by 2 no. species, Buzzard (80 no. flightlines) and Kestrel (61 no. flightlines).

Sparrowhawk (27 no. flightlines) was recorded marginally more often than in the previous winter period. The only other raptor species recorded during the winter VPs in 2021/2022 was 2 no. observations of Peregrine Falcon (spending a cumulative total of 40-seconds within the wind farm site).

Buzzard flightlines totalled over 3-hours during this winter period. Of these observations, just over 47-minutes were spent within the wind farm site (**Annex 5.3**). Kestrels were frequently recorded, although in keeping with previous survey seasons, the bulk of the observations were of birds outside the wind farm site (**Annex 5.3**). However, of the 5 no. survey seasons, this was the period with the greatest cumulative amount of overflying of the wind farm site by both Kestrel (over 16-minutes) and Sparrowhawk (over 15-minutes).

In contrast to the previous winter period, there were few sightings of Golden Plover in the study area (5 no. flightlines) and none of the observed flights were across the wind farm site. No Golden Plover were present in December 2021 or February 2022 and there were only single observations made in November 2021 and January and March 2022.

There were relatively few sightings of Snipe (2 no. flightlines) and Lesser Black-backed Gulls (2 no. flightlines), with no flightlines across the wind farm site (**Annex 5.3**). 4 no. additional target waterbird species were observed. Of these, Grey Heron (13 no. flightlines) were cumulatively present over the site for 2-minutes. There were relatively

few and brief sightings of Little Egret, *Egretta garzetta* (2 no. flightlines), Mallard, *Anas platyrhynchos* (5 no. flightlines) and Teal, *Anas crecca* (2 no. flightlines).

Winter Season 2021/2022 – 202 no. flightlines			
Species	No. of flightlines	Duration On-site (s)	Duration Off-site (s)
Raptors			
Buzzard	80	2,845 [47min 25s]	8,150 [2hr 15min 50s]
Kestrel	61	995 [16min 35s]	6,945 [1hr 55min 45s]
Sparrowhawk	27	930 [15min 30s]	1,445 [24min 5s]
Peregrine FalCon	2	40 [40s]	210 [3min 30s]
Waders			
Golden Plover	5	0	575 [9min 35s]
Snipe	3	0	50 [50s]
Waterbirds			
Lesser Black-backed Gull	2	0	275 [4min 35s]
Grey Heron	13	120 [2min 0s]	295 [4min 55s]
Little Egret	2	100 [1min 40s]	30 [30s]
Mallard	5	20 [20s]	105 [1min 45s]
Teal	2	5 [5s]	20 [20s]

**Table 5.21: Winter Season 2021/2022 Flightline Summary**

The flightline descriptions are summarised in **Annex 5.3**. The associated flightline mapping is presented in **Annex 5.3** with each flightline marked with the corresponding flightline ID.

The overall bird species recorded as casual observations by the VP observers during this winter period is summarised in **Table 5.22**.

The species mix is typical of the range of habitats present in the study area, with farmland and woodland birds well represented. Brambling, *Fringilla montifringilla*, is a wintering finch species, that was not recorded at the site in previous winter periods.

Species	Species
Blackbird	Little Egret
Blue Tit	Long-tailed Tit
Brambling	Magpie
Bullfinch	Mallard
Buzzard	Meadow Pipit
Chaffinch	Mistle Thrush
Coal Tit	Peregrine Falcon
Crossbill	Pheasant
Duncock	Pied Wagtail
Feral Pigeon	Raven

Species	Species
Fieldfare	Redwing
Goldcrest	Reed Bunting
Golden Plover	Robin
Goldfinch	Rook
Great Spotted Woodpecker	Siskin
Great Tit	Skylark
Greenfinch	Snipe
Grey Heron	Song Thrush
Grey Wagtail	Sparrowhawk
Hooded Crow	Starling
House Sparrow	Stonechat
Jackdaw	Teal
Jay	Tree Sparrow
Kestrel	Whitethroat
Lesser Black-backed Gull	Woodpigeon
Lesser Redpoll	Wren
Linnet	

**Table 5.22: Bird Observations during Winter Season 2021/2022**

### 5.3.3.2 Transects and Point Count Surveys

Breeding and winter bird communities in the area were also recorded using standard belt transect and point count methodologies. The location of the transects and point counts is illustrated at Figure 5.5. Detailed results from the transects and point count surveys are presented at **Annex 5.4**.

A summary of the species recorded across the 5 no. survey seasons is provided in **Annex 5.4**. Overall, a total of 45 no. species were recorded in the breeding season period with 47 no. species recorded during the winter transects and point counts. Summary tables in **Annex 5.4** summarise the season in which each species was recorded as well as the current conservation status of the species in Ireland.

#### Winter Season 2019/2020

A total of 38 no. species were recorded across the 6 no. survey transects in Winter 2019/2020 (**Annex 5.4**). The peak counts observed for each species on each of the transects during the winter 2019/2020 survey walkovers is presented in the summary data table in **Annex 5.4**.

Golden Plover was recorded on Transect 1 and Transect 6, both observations being of flocks seen off-site at distance.

**Annex 5.4** also presents the results of the Point Count surveys in the same period. A similar species assemblage was noted, with a total of 33 no. bird species recorded across the 10 no. Point Count locations.

#### Breeding Season 2020

A total of 36 no. species were recorded across the 6 no. survey transects in the 2020 breeding season (**Annex 5.4**). The peak counts observed for each species on the survey walkover is shown in the corresponding table in **Annex 5.4**.

Rook, *Corvus frugilegus*, was the most abundant species recorded. Great Spotted Woodpecker was recorded on Transect 2 and Transect 5.

**Annex 5.4** also presents the results of the Point Count surveys in the same period. A similar species assemblage was noted, with a total of 35 no. bird species recorded across the 10 no. Point Count locations.

#### Winter Season 2020/2021

A total of 38 no. species were recorded across the 6 no. survey transects in Winter 2020/2021 (**Annex 5.4**). The peak counts observed for each species on the survey walkover is shown in the corresponding table in **Annex 5.4**.

**Annex 5.4** also presents the results of the Point Count surveys in the same period. A similar species assemblage was noted, with a total of 36 no. bird species recorded across the 10 no. Point Count locations.

The species assemblage and diversity of species recorded was very similar to the previous winter season. Common resident species such as Robin, *Erithacus rubecula* and Wren, *Troglodytes troglodytes* and corvids, including Rook, Hooded Crow, *Corvus cornix*, Jackdaw, *Corvus monedula* and Magpie, *Pica pica* were frequently encountered. Woodland specialist, Jay, *Garrulus glandarius*, was also observed.

#### Breeding Season 2021

A total of 31 no. species were recorded across the 6 no. survey transects in the 2021 breeding season (**Annex 5.4**). The peak counts observed for each species on the survey walkover is shown in the corresponding table in **Annex 5.4**.

The species diversity recorded in the 2021 breeding season was marginally lower than in the previous breeding season. This was also reflected in the species diversity recording during the Point Count surveys in the same period (26 no. species).

Rooks were common and widespread during the breeding season surveys.

#### Winter Season 2021/2022

A total of 39 no. species were recorded across the 6 no. survey transects in Winter 2019/2020 (**Annex 5.4**). The peak counts observed for each species on the survey walkover is shown in the corresponding table in **Annex 5.4**.

**Annex 5.4** presents the results of the Point Count surveys in the same period. A similar species assemblage was noted, with a total of 38 no. bird species recorded across the 10 no. Point Count locations.

The results of the winter transects and point count surveys were very consistent across the 3 no. survey years. Similar species diversity and abundance was recorded at the site.

#### Summary of Birds Recorded

A total of 59 no. bird species were recorded across the 5 no. seasons of breeding and wintering transect and point count surveys in this area. **Annex 5.4** summarises the results of these surveys with the seasons in which each species was present and the current conservation status of each species indicated.

A total of 45 no. bird species were recorded across the 2 no. breeding seasons, with a total of 47 no. species recorded across the 3 no. winter season surveys. 6 no. of the 59 no. species recorded are on the Red-list (Gilbert *et al.* 2021), as follows: Kestrel, Meadow Pipit, Grey Wagtail, Redwing, Golden Plover and Snipe. A further 14 no. species are currently Amber-listed, including Skylark, House Martin, Swallow, Willow Warbler, Starling, Spotted Flycatcher, Goldcrest, House Sparrow, Tree Sparrow, Greenfinch, Linnet, Mallard, Lesser Black-backed Gull and Herring Gull.

### Other Species Recorded

There were 2 no. sightings of Barn Owl, *Tyto alba* in the vicinity of the site. The first was recorded on 15 January 2020 at ITM E660280 N664299 c. 0.5km south-southwest of the wind farm site and the second was of a casual sighting of a bird crossing the M9 on the evening of 22 April 2021 (ITM E666069 N661276), c. 6km southeast from the wind farm site. Barn Owls have been recorded in the area (NBDC) and several road-killed birds were reported from the M9 in 2020. Barn Owl is currently a Red-listed species.

Wintering Woodcock, *Scolopax rusticola*, were recorded at dusk near forestry edge at Baunreagh, c. 0.4km southeast of the wind farm site on 3 December 2021.

### Bird Observations along the Grid Connection Route

There are very few waterbird sites in the vicinity of the grid connection route. The closest is Newpark Marsh to the north of Kilkenny City and a further 16 no. sites located within 20km of the route. The majority are sites where swans have been recorded along the River Barrow, substantially to the east of the grid connection route, between Goresbridge and Carlow town.

In winter 2019/2020, driven surveys of known Whooper Swan, *Cygnus cygnus* sites in the wider area recorded:-

- Between 12 no. and 37 no. Whooper Swans present during all surveys along the southern section of fields surveyed, c. 7km from the wind farm, along the River Barrow; and,
- Fields along the Oldleighlin River near Leighlinbridge, c. 6.5km from the wind farm were flooded during the December survey, and 2 no. Wigeon *Mareca penelope*, two Cormorants *Phalacrocorax carbo*, one Grey Heron, 140 no. Lapwing *Vanellus vanellus*, 2 no. Curlew and 40 no. Black-headed Gulls *Chroicocephalus ridibundus* were recorded.

Surveys along the grid connection route did not record the presence of any Whooper Swans during any of the driven surveys between 2019 and 2022. Sightings of raptors, waders and waterbird were uncommon during the surveys. The following were the most notable waterbird sightings recorded close to the route of the grid connection:-

- A flock of Lapwing *Vanellus vanellus* (21 no. birds) was recorded at Maddoxtown near the River Nore in January 2021, c. 13km from the wind farm;
- A flock of 35 no. Lapwing were observed overflying the M9 east of Clara, c. 8km from the wind farm, in November 2021;
- 11 no. Lesser Black-backed Gulls were recorded flying east in December 2020 at Clara GAA club, c. 8km from the wind farm; and,
- 2 no. Cormorants were recorded in flight, heading south at heights of >200m AGL in January 2021 at Kilbaylet Upper, c. 8.5km from the wind farm.

### Incidental Bird Records from Replant Lands

A record was maintained of all birds casually seen or heard during the March 2022 visit to the replant lands. In all 13 no. species were recorded per **Table 5.23** below.

Rook was the most abundant species present with some nesting Rooks noted in the mature trees on site.

Species	Scientific Name
Blackbird	<i>Turdus merula</i>
Blue Tit	<i>Cyanistes caeruleus</i>
Chaffinch	<i>Fringilla coelebs</i>
Dunnock	<i>Prunella modularis</i>
House Sparrow	<i>Passer domesticus</i>
Jackdaw	<i>Corvus monedula</i>
Magpie	<i>Pica pica</i>
Redwing	<i>Turdus iliacus</i>
Robin	<i>Erithacus rubecula</i>
Rook	<i>Corvis frugilegus</i>
Starling	<i>Sturnus vulgaris</i>
Woodpigeon	<i>Columba palumbus</i>
Wren	<i>Troglodytes troglodytes</i>

**Table 5.23: Bird species recorded during walkover of Replant Lands**

#### Incidental Bird Records at Haul Route Works Locations

Very few bird species were recorded the haul route works locations. No birds were recorded nesting on or under Black Bridge. A pair of Mallard, *Anas platyrhynchos* were observed just downstream of the bridge on 5 August 2022. A small number of bird species were recorded as casual observations during visits to the N78/L1834 junction. Some Corvids were observed in the open field area, with Rook, *Corvus frugilegus* present on several occasions. Swallow, *Hirundo rustica*, was recorded flying over the field, flycatching. Other species observed or heard during visits to this location were Robin, *Erithacus rubecula*, Blackbird, *Turdus merula*, Wren, *Troglodytes troglodytes*, Goldfinch, *Carduelis carduelis*, Jackdaw, *Corvus monedula*, and Magpie, *Pica pica*.

#### 5.3.4 Mammals

##### 5.3.4.1 Desktop Survey

A relatively wide range of terrestrial mammals have previously been recorded in the 10km grid squares in which the proposed development site is located (S98, NBDC; **Table 5.24**).

Common Name	Scientific Name	Conservation Status*
American Mink	<i>Mustela vison</i>	Introduced species (non-native)
Badger	<i>Meles meles</i>	WA, LC
Brown Rat	<i>Rattus norvegicus</i>	Introduced species (non-native)
Eastern Grey Squirrel	<i>Sciurus carolinensis</i>	Introduced species (non-native)
Eurasian Red Squirrel	<i>Sciurus vulgaris</i>	WA, LC

Common Name	Scientific Name	Conservation Status*
European Rabbit	<i>Oryctolagus cuniculus</i>	Introduced species (non-native)
Greater White-toothed Shrew	<i>Crocidura russula</i>	Introduced species (non-native)
Irish Hare	<i>Lepus timidus hibernicus</i>	Annex V, WA, LC
Irish Stoat	<i>Mustela erminea hibernica</i>	WA, LC
Otter	<i>Lutra lutra</i>	Annex II/IV, WA, NT
Pine Marten	<i>Martes martes</i>	Annex V, WA, LC
Red Fox	<i>Vulpes vulpes</i>	LC
West European Hedgehog	<i>Erinaceus europaeus</i>	WA, LC
Wood Mouse	<i>Apodemus sylvaticus</i>	LC
Red Fox	<i>Vulpes vulpes</i>	LC

<https://maps.biodiversityireland.ie/Map>. Accessed 30/03/2022.

\* Key: Annex status (EU Habitats Directive), WA (Protected under Wildlife Act 1976), LC – Least Concern, NT – Near Threatened (Marnell et al., 2019).

#### Table 5.24: Terrestrial Mammals Previously Recorded in 10km Grid Square S66 (NBDC)

3 no. species of bats have been recorded in the 10km grid squares in which the wind farm site is located (S66, NBDC). These species and their conservation status are detailed at **Table 5.25** below.

Common Name	Scientific Name	Conservation Status*
Daubenton's Bat	<i>Myotis daubentonii</i>	Annex IV, WA
Common Pipistrelle	<i>Pipistrellus pipistrellus</i>	Annex IV, WA
Soprano Pipistrelle	<i>Pipistrellus pygmaeus</i>	Annex IV, WA

<https://maps.biodiversityireland.ie/Map>. Accessed 30/03/2022.

\* Key: Annex status (EU Habitats Directive), WA (Protected under Wildlife Act 1976), LC – Least Concern, NT – Near Threatened (Marnell et al., 2019).

#### Table 5.25: Bat Species Previously Recorded in 10km Grid Square S66 (NBDC)

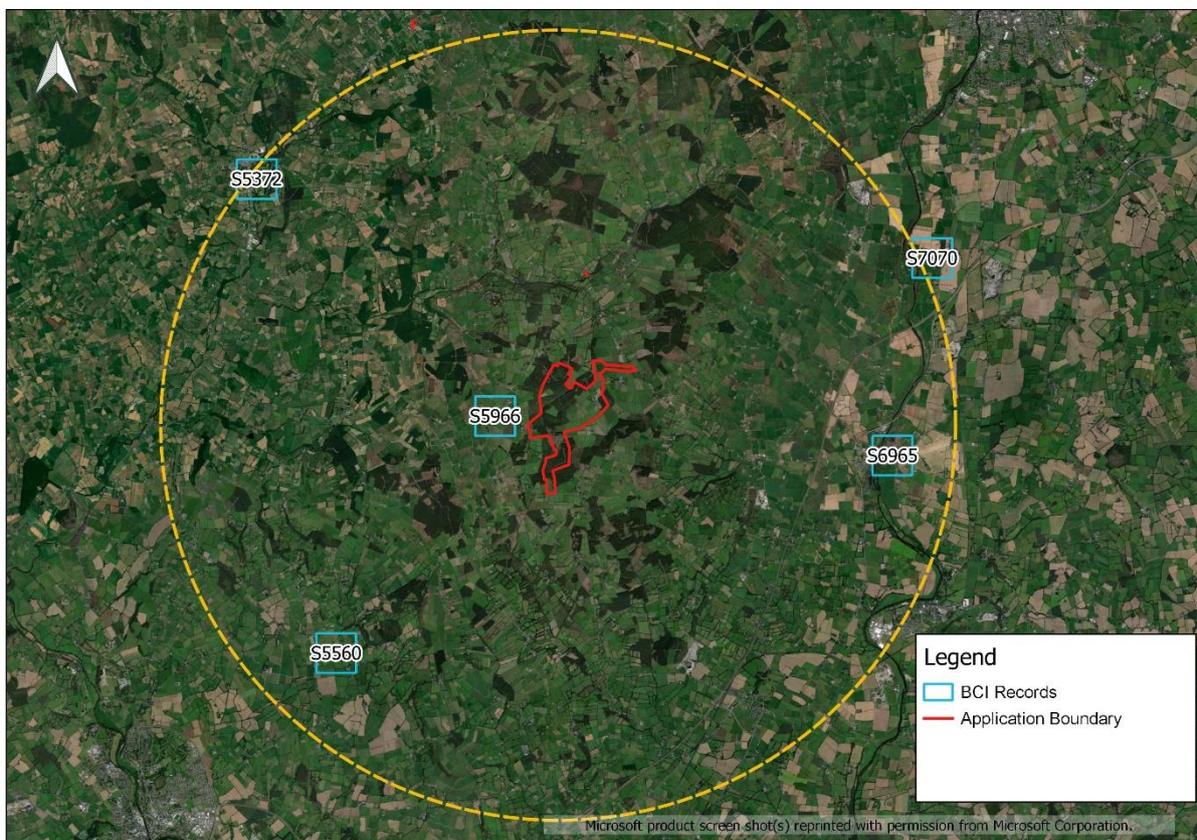
A desktop study of available information on the bat potential of the local area was carried out prior to the field surveys, with particular attention given to the model of Bat Landscapes as available on the NBDC website. This model is based on the relative importance of landscape and habitat associations for bat species across Ireland (see Lundy et al. 2011).

The overall bat suitability index value (26) according to *Model of Bat Landscapes for Ireland* (Lundy et al. 2011) suggests the landscape in which the wind farm site is located is of 'low-to-moderate' suitability for bats in general. Species specific scores are provided in **Table 5.26**. The Annex II (EU Habitats Directive) listed bat species, Lesser Horseshoe Bat, is assigned a score of '1' as the wind farm site is outside the known range for this species.

Common Name	Scientific Name	Suitability Index
All bats	-	25.89
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	34
Brown long-eared bat	<i>Plecotus auritus</i>	41
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	44
Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>	1
Leisler's bat	<i>Nyctalus leisleri</i>	32
Whiskered bat	<i>Myotis mystacinus</i>	30
Daubenton's bat	<i>Myotis daubentonii</i>	20
Nathusius pipistrelle	<i>Pipistrellus nathusii</i>	0
Natterer's bat	<i>Myotis nattererii</i>	31

**Table 5.26: Suitability of the Study Area for Bat Species**

Available bat records were provided by Bat Conservation Ireland (BCI) from their database of roosts locations and other bat records. These records are summarised in **Table 5.27** below and the location of records is shown in **Figure 5.13**. The relevant search area included a 10km radius from a central point within the wind farm site. Known roost locations in the target area as well as results from BCI Volunteer based surveys and records submitted by ecological consultants, were provided. Where roost locations occur in private dwellings, the location provided refers to the central point in the relevant 1km grid square.



**Figure 5.13: BCI Record Locations**

Grid Reference (IG)	Address	Species
S5372	Mill Lane	Soprano Pipistrelle
S5560	Kilderry	Soprano Pipistrelle
S7070	Milford Bridge (ITM E669935 N670540)	Daubenton's Bat
S5966	Mothel	Natterer's Bat
S6965	Valerian Bridge, Leighlinbridge. (ITM E669035 N665441)	Daubenton's Bat

**Table 5.27: BCI Records of Bat Roosts**

#### 5.3.4.2 Field Surveys

##### Non-volant Mammals

Dedicated walkover surveys of the project site were carried out to identify any available signs of non-volant mammal species encountered. Trail cameras were also deployed for passive monitoring of mammal activity.

A range of mammal signs were encountered and underground dwellings used by mammals were identified. A total of 6 no. non-volant mammal species were identified during the study (**Table 5.28**).

Common Name	Scientific Name	Conservation Status (Marnell 2019)
Badger	<i>Meles meles</i>	Least Concern
Eurasian rabbit	<i>Oryctolagus cuniculus</i>	Least Concern
Irish hare	<i>Lepus timidus subsp. hibernicus</i>	Least Concern
Pine marten	<i>Martes martes</i>	Least Concern
Red fox	<i>Vulpes vulpes</i>	Least Concern
Red Squirrel	<i>Sciurus vulgaris</i>	Least Concern

**Table 5.28: Non-volant Mammals confirmed to be present at the Project Site**

2 no. badger setts were identified and, in both cases, are outlier setts located proximal to access tracks to be constructed as part of the project. The locations of setts are not identified in this report, but images of the sett entrances are illustrated at **Plate 5.13**. These showed signs of occasional use and are typically located at a distance from the primary setts. They, like other secondary and tertiary setts, can be quiescent for prolonged periods and some are completely abandoned.

'Sett\_A' is located within forestry on an old earth bank which was formerly a field boundary. The sett was classified as an outlier sett and consisted of a single entrance. It was monitored by a trail camera between 22 December 2021 and 4 April 2022 and low levels of badger activity took place during the monitoring period. A Badger was recorded entering and exiting the sett on the following dates:-

- 23 December 2021;
- 10 February 2022; and,
- 16 February 2022.

An internal wind farm road is proposed to be constructed within 20m of the sett entrance.

'Sett B' was located within an earth bank which divides 2 no. fields of improved agricultural grassland. It consists of a single entrance and no signs of significant excavation were present. The sett did not appear to be in frequent use and no signs of current activity were recorded. This burrow entrance is located on an elevated bank relatively close to a proposed access track (<10m).

The status of setts can change over time and it is possible that even long abandoned setts may be used by other mammals species or reoccupied by Badgers at some time in the future.

Signs of badger activity (tracks, feeding signs) were frequently encountered throughout the site and consisted of foraging signs (snuffle holes) and latrines. Badgers were recorded on trail cameras 'Cam\_2' and 'Cam\_5' (see **Figure 5.6**) regularly. Given the habitats present within the wind farm site, it is likely that this area, in particular, represents good foraging habitat for locally occurring badgers.

Similarly, Fox scat was found widely throughout the site. Foxes were regularly recorded on trail cameras.

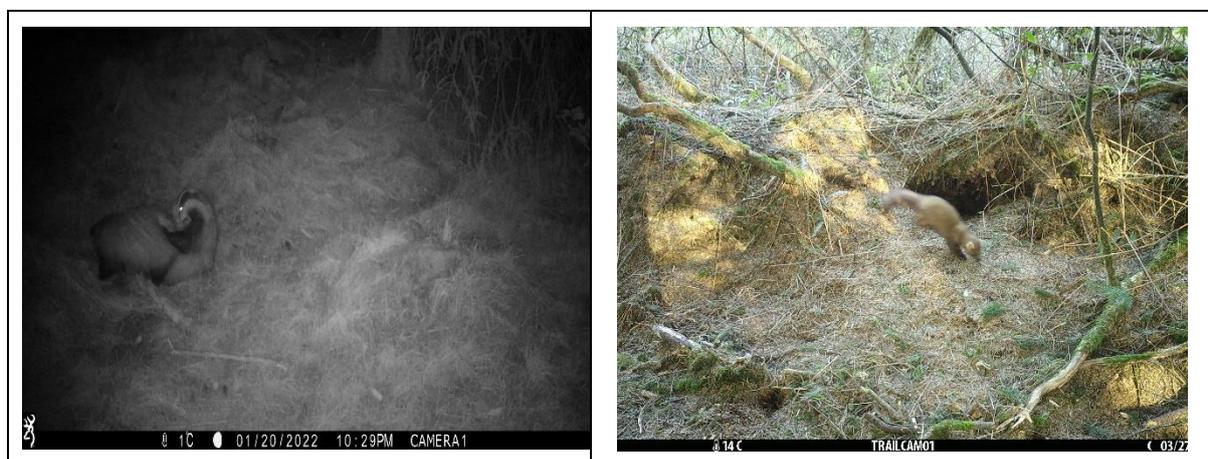
Pine Marten were also detected at 3 no. camera trap locations (Cam\_2, Cam\_5 and on the camera at the outlier Badger sett). An adult Pine Marten was observed crossing the road near VP4 on 26 May 2021.

Red Squirrel were observed regularly at the outlier Badger sett. Irish hare was observed within the plantation forestry and was recorded by trail cameras 'Cam\_1', 'Cam\_2' and 'Cam\_5. Rabbits (sightings, signs) were predominantly recorded on the lowland pasture habitats surrounding the wind farm site.

Sika Deer is likely occur at the site, at least occasionally. Other non-native deer species or hybrids may also be present in the study area. No evidence of native Red Deer was recorded.

Wood mouse, Brown rat and Pygmy and Greater White-toothed shrew are likely to occur throughout the site where suitable habitats and conditions for each individual species exist. The scrub, treelines and drier woodland habitats are suitable for shrews, Wood mouse and Brown rat. Each of these species are subject to seasonal fluctuations in population as the availability of food changes throughout the year. The treelines, as well as the edge of the woodland and scrub habitats are suitable for Irish stoat and hedgehog but neither of these species was recorded during the current surveys.

Examples of the mammal images captured by trail cameras at the proposed site are provided at **Plate 5.13** below.



<p>Two Badgers grooming. Cam_2.</p>	<p>Pine Marten recorded at outlier sett 'Sett_A' (location not disclosed).</p>
	
<p>Red Fox. Cam_5.</p>	<p>Badger exiting outlier sett 'Sett_A' (location not disclosed).</p>
	
<p>Red Squirrel at outlier sett 'Sett_A' (location not disclosed).</p>	<p>Irish hare. Cam_1.</p>

**Plate 5.13: Sample Images captured by Trail Cameras**

*Non-volant Mammals along the Grid Connection Route*

No breeding or resting places of protected non-volant mammal species were recorded along the grid connection route. Roadkilled Fox was recorded on the road margin at Feathallagh c. 7km southwest of the wind farm in August 2022. Given the length of the grid connection route, it is likely that a variety of non-volant mammal species occur in the vicinity of the route. However, as noted at **Section 5.3.5.6**, there was no sign of Otter (holts, spraint marking etc.) at the HDD locations. There is very limited likelihood of breeding or resting mammals along the edge of the public road network followed by the grid connection route.

*Non-volant Mammals on the Haul Route*

No sightings or signs of non-volant mammals were recorded at Black Bridge or at the N78/L1834 junction. No burrows or resting places of protected species were present.

## Bat Surveys

The importance of the project site and its environs for bats was assessed through a number of ways. Daytime assessments of the suitability of the features present in the area for roosting bats was undertaken. Night-time ultrasonic detector surveys were carried out at the wind farm site to record bat activity in the area from which information on species composition, relative abundance and landscape usage could be derived. Passive bat echolocation survey was carried out at 7 no. detector locations while active surveys were carried out at the wind farm site and along the grid connection route.

No significant roosts (e.g. maternity roosts or underground hibernation sites) were identified or are likely to occur within the wind farm site. During surveys to identify any potentially significant roosts which may be affected by the project, 2 no. minor roosts were discovered.

### Passive Bat Surveys

Overall, a moderate level of activity was recorded at the site, and a moderate-to-high level of species diversity. The wind farm site contains limited roosting opportunities and high-quality foraging habitat. A total of 7 no. bat species were recorded (possibly 8 no. as Whiskered Bats and Brandt's Bats are indistinguishable through ultrasonic detection). Details of the dates and weather conditions during the passive detector deployments are shown in **Annex 5.5**.

The level of activity recorded at the site varies according to season, location and species. The results of passive bat monitoring are presented in **Table 5.29** below. A total of 19,818 individual bat 'registrations' were recorded during passive bat monitoring at wind turbine locations. Analysis of these registrations shows activity was highest in the Autumn survey period when an average of 83 no. registrations per detector per night were recorded. 70 no. registrations per detector per night were recorded in Summer while 53 no. registrations per detector per night were recorded in Spring. Activity is typically highest in Autumn when that year's young bats are on the wing, and bats are foraging in order to prepare for winter hibernation.

Leisler's Bat was the most commonly recorded species, and accounted for 45.3% of all registrations. Leisler's Bats are a relatively large and fast-flying species and have been recorded to have relatively large territories and to travel significant distances to reach preferred foraging habitats (Shiel *et al.* 1999). While strong habitat associations for the species have been difficult to identify in an Irish context, there is evidence to suggest a positive association with pasture and freshwater habitats (Roche *et al.*, 2014). Given its characteristics and habitat composition, the project site is, therefore, likely to represent a sub-optimal foraging habitat for this species. Leisler's Bat is considered to be of relatively high risk of collision with wind turbine blades, due to their higher level of flight (SNH, 2019; NatureScot 2021).

Common Pipistrelle was the second most commonly recorded species and accounted for 41.9% of all registrations. Soprano Pipistrelle was the third most commonly recorded species and accounted for 7% of all registrations. These species are common and widespread in Ireland and utilise a variety of habitats. They were recorded during all 3 no. survey periods and are considered to be of relatively high risk of collision with wind turbine blades, due to their higher level of flight (NatureScot 2021).

Natterer's Bat (4.5%), Daubenton's Bat (0.7%), Brown Long-eared Bats (0.6%) and Whiskered Bat (0.1%) were all recorded relatively infrequently. Natterers Bats are

strongly associated with woodland and broadleaf woodland in particular (Roche *et al.*, 2014) and the project site likely represents suitable, but suboptimal, foraging habitat for Natterer's Bat. Daubenton's Bats generally forage over waterbodies and therefore the project site likely represents a commuting habitat and suboptimal or occasional foraging habitat. Brown Long-eared Bats prefer to forage in woodland, hunting moths and other insects and can be under-recorded in ultrasonic detection survey due to their quiet calls.

No evidence of Lesser Horseshoe Bat was detected, and the site occurs outside the known range for the species. Some low frequency pipistrelle calls were recorded in the range of 42kHz to 45kHz, and *Nathusius pipistrelle* can echolocate within this range. While it cannot be ruled out that *Nathusius pipistrelle* may occur (at least occasionally), no pipistrelle calls with a peak frequency of less than 42kHz were detected, and therefore there is no conclusive evidence of the presence of *Nathusius pipistrelle*.

Monitoring location 'Bat\_1' had the highest number of registrations recorded overall and accounted for 38% of all bat registrations recorded during the passive bat monitoring (**Figure 5.6**). 'Bat\_4' accounted for 31.2%, 'Bat\_2' accounted for 12.5% and Bat\_3 for 8.2%. The remaining monitoring stations ('Bat 5', Bat\_6 and 'Bat 7') each accounted for <5% of all registrations.

	Species	Bat_1	Bat_2	Bat_3	Bat_4	Bat_5	Bat_6	Bat_7
Spring 2021	Brown Long-eared bat	0.05882 [1]	0.05882 [1]	-	-	-	0.18 [2]	0.059 [1]
	Common Pipistrelle	20.88 [118]	2.588 [14]	-	8.9 [34]	0.47 [4]	12 [115]	0.18 [2]
	Daubenton's bat	0.9412 [5]		-	-	0.12 [1]	0.18 [1]	-
	Leisler's bat	97.88 [963]	9.765 [65]	-	110 [721]	15 [150]	12 [65]	6.1 [29]
	Natterer's bat	2.235 [9]	0.8824 [3]	-	-	0.47 [2]	1.6 [6]	-
	Soprano Pipistrelle	5.294 [33]	1.529 [10]	-	0.88 [6]	0.059 [1]	2 [18]	-
Summer 2021	Brown Long-eared bat	0.07692 [1]	0.07692 [1]	-	-	0.4615 [3]	0.3077 [1]	0.07692 [1]
	Common Pipistrelle	62.15 [412]	5.615 [41]	10.31 [83]	217.3 [731]	4 [8]	2.077 [8]	2.308 [7]
	Daubenton's bat	1 [6]	0.6154 [5]	0.2308 [1]	0.1538 [1]	0.3077 [2]	0.3077 [1]	0.07692 [1]
	Leisler's bat	81.85 [342]	13.31 [49]	0.6923 [5]	11 [59]	22 [38]	12.62 [98]	9.154 [20]
	Natterer's bat	5.231 [15]	0.5385 [6]	3.692 [9]	0.07692 [1]	0.6154 [2]	1.385 [5]	0.07692 [1]
	Soprano Pipistrelle	12.85 [81]	2.077 [15]	0.4615 [3]	0.3077 [2]	0.5385 [2]	0.2308 [1]	0.07692 [1]
	Whiskered bat	0.07692 [1]	-	-	0.3077 [2]	-	-	-
Autumn 2021	Brown Long-eared bat	1.625 [2]	2.143 [6]	1.143 [4]	1.857 [4]	0.7857 [4]	0.2857 [4]	0.2143 [2]
	Common Pipistrelle	160.3 [633]	23.79 [59]	32.71 [98]	44.93 [100]	4.786 [12]	0.2857 [2]	0.7143 [5]
	Daubenton's bat	2.667 [5]	0.9286 [2]	0.9286 [4]	0.7143 [3]	0.9286 [4]	0.1429 [1]	-
	Leisler's bat	34 [64]	105.6 [198]	21.71 [41]	17.5 [37]	9.929 [36]	0.2857 [1]	3.929 [10]
	Natterer's bat	4.3 [10]	6.143 [17]	34.93 [89]	0.3571 [1]	1.429 [3]	0.2857 [1]	
	Soprano Pipistrelle	38.54 [151]	16.07 [38]	8.214 [27]	7.857 [17]	2.929 [8]	0.2857 [1]	0.07143 [1]
	Whiskered bat	-	-	0.1429 [2]	0.8571 [3]	0.07143 [1]	0.07143 [1]	-

Note: Data is presented as "average [peak]" where average is the average number of registrations per night. Peak data represents the maximum number of nightly registrations from any night in the relevant recording period.

**Table 5.29: Results of Passive Bat Monitoring**

### Monitoring at Height

An 80m meteorological mast was utilised to install a microphone at c. 50 meters above ground level during the Autumn 2021 bat detector surveys (the nights of the 18 August to 27 August inclusive). A second microphone was placed at ground level to allow direct comparison of activity levels at height versus at ground level. The survey location is shown as 'Bat\_MM' in **Figure 5.6**.

During the 11-night survey period, 322 no. bat registrations were recorded at height, compared with 2140 no. at ground level. Leisler's Bat, Common Pipistrelle and Soprano Pipistrelle were recording at height with Leisler's Bat accounting for 92.7% of registrations. Common Pipistrelle accounted for 6.4% of registrations while Soprano Pipistrelle accounted for 1% registrations recorded at height. The results of the detailed analysis of bat calls from the microphone at height is shown in **Table 5.30** below.

At ground level, 80.4% of registrations recorded at ground level were identified as Leisler's Bat, followed by Common Pipistrelle (13%), Soprano Pipistrelle (4.5%) and Natterer's Bat (0.9%) with Daubenton's Bat, Whiskered Bat and Brown Long-eared Bat all recorded occasionally.

On the night of the 20 August 2021, no registrations were recorded at either ground level or at height, and analysis of available weather data shows relatively high wind speeds occurred on this night. On the 20 August 2021, activity across all detectors was suppressed within only 12 no. registrations recorded in total and no registrations recorded at Bat\_5, Bat\_6 or Bat\_7.

It should be noted that only one monitoring point was available for survey at height, and this location occurs centrally within the wind farm site but at an elevated and relatively exposed location. Data gathered at this location should not be interpreted as applying throughout the study area as the habitat associations of bat species vary.

	Survey Night	Brown Long-eared Bat	Common Pipistrelle	Daubenton's Bat	Leisler's Bat	Natterer's Bat	Soprano Pipistrelle	Whiskered Bat	Total
Ground Level	18/08/2021	-	29	3	142	5	6	-	185
	19/08/2021	-	18	1	33	-	7	-	59
	20/08/2021	-	-	-	-	-	-	-	0
	21/08/2021	1	10	-	367	3	2	-	383
	22/08/2021	-	49	-	304	4	21	-	378
	23/08/2021	2	39	4	143	-	16	-	204
	24/08/2021	1	16	-	66	1	4	-	88
	25/08/2021	1	67	1	198	1	16	-	284
	26/08/2021	3	31	6	223	2	15	1	281
	27/08/2021	-	8	-	170	2	6	-	186
	Total		8	267	15	1,646	18	93	1
At Height	18/08/2021	-	1	-	46	-	-	-	47

	Survey Night	Brown Long-eared Bat	Common Pipistrelle	Daubenton's Bat	Leister's Bat	Natterer's Bat	Soprno Pipistrelle	Whiskered Bat	Total
	19/08/2021	-	1	-	14	-	-	-	15
	20/08/2021	-	-	-		-	-	-	0
	21/08/2021	-	1	-	57	-	-	-	58
	22/08/2021	-	1	-	34	-	1	-	36
	23/08/2021	-	7	-	32	-	1	-	40
	24/08/2021	-	4	-	7	-	-	-	11
	25/08/2021	-	3	-	24	-	-	-	27
	26/08/2021	-	2	-	48	-	-	-	50
	27/08/2021	-		-	28	-	1	-	29
	Total	0	20	0	290	0	3	0	313

**Table 5.30: Results of Passive Bat Monitoring at Height**

Due to the characteristics of the project along the grid connection route, haul route works locations and replant lands; no passive bat surveys were undertaken.

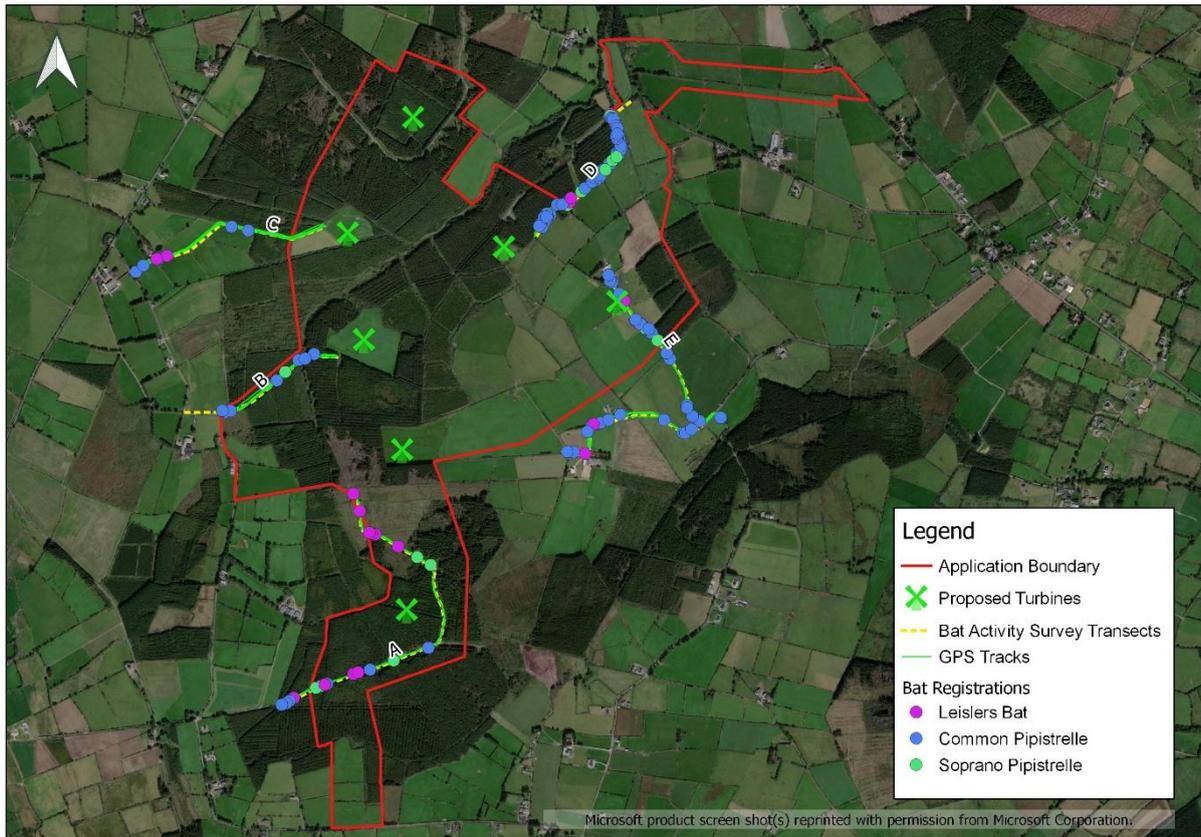
#### Active Bat Surveys

Active bat surveys were carried out for both the wind farm site and the grid connection route. The results of these investigations are presented separately below.

Active bat surveys were used to complement the information gained from passive bat monitoring at the wind farm site. The aim of the surveys was to identify any particular flightlines which may be apparent and to identify emergence behaviour which would indicate the presence of a roost.

The locations of registrations recorded during active bat surveys at the wind farm site are shown in **Figure 5.14**. No activity indicative of emergence from (or proximity to) an active roosting location was recorded during grid connection route surveys. While individual observations were made of bats in flight, no patterns of behaviour were noted which would suggest the presence of important or significant commuting routes.

The data derived from active surveys reflected the data derived from passive bat surveys in terms of species diversity and relative abundance.



**Figure 5.14: Results of Active Bat Surveys at Wind Farm Site**

Active bat surveys were carried out on the proposed grid connection route in order to assess the relative abundance and species diversity of bats along the route.

The diversity of species recorded during active bat surveys along the grid connection route (**Figure 5.15**) was similar to the species diversity recorded on the wind farm site. For all species recorded along the grid connection route, the activity recorded was generally positively correlated with the presence of mature trees and large and structurally diverse hedgerows along the roadside.

Further assessment was carried out on potential roost features along and proximate to the grid connection route (see below).



**Figure 5.15: Results of Active Bat Surveys along the Grid Connection Route**

#### *Assessment of Potential Roosting Features (PRF)*

Surveys were carried out to identify and investigate PRFs at the wind farm site and along the grid connection route. During these surveys, all structures which may potentially host roosting bats were inspected visually.

NatureScot 2021 recommends that key roosting features, which could support maternity roosts and significant hibernation and/or swarming sites, be identified in an area extending to 200m plus one rotor radius of the development boundary. As set out at **Section 5.2.4.4** above, roost surveys were carried out in an area extending c. 300m from the site boundary.

Visual surveys of potential significant bat roost features within at least 300m of the site boundary were carried out. Where any PRF had the potential to be directly or indirectly affected by the proposed works, visual surveys were undertaken to establish the suitability of the feature for roosting bats.

Targeted surveys were carried out to determine the presence of bats or PRFs where works may impact directly or indirectly on a PRF. Features with potential to accommodate a significant bat roost were initially identified through examination of OSi historic 6" black & white mapping, aerial imagery as well as site walkovers. Information on known mines and caves was identified through the examination of publicly available information produced by Geological Survey Ireland. Some of the historic features identified by historic mapping no longer exist.

A number of structures, primarily residences and associated outbuildings and agricultural buildings, were shown on OSi historic 6" mapping, OSi Discovery mapping or aerial imagery. The absence of other relevant structured was confirmed by ground

truthing. The structures considered are identified in **Figure 5.16** and summarised in **Table 5.31**, below.

EPA data regarding known locations of caves and historic mining operations was examined in order to identify the presence of any known underground features which could support a significant bat roost. No known underground sites are present within the project site.

Visual inspections were carried out on 28 July 2020, 30 June 2021 and 1 July 2021. Features inspected included bridges, buildings and trees.

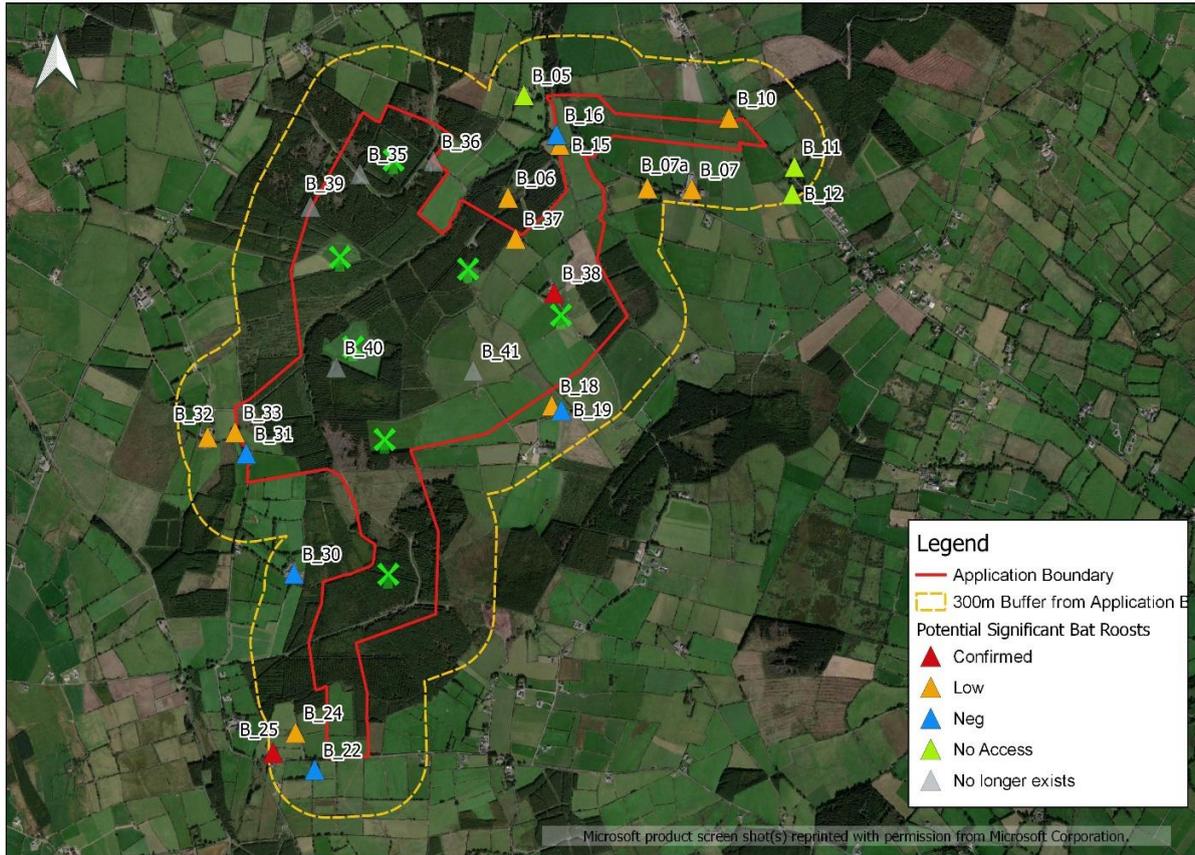
Roosting was confirmed at the B\_38 structure during the emergence survey on 1 June 2022. A single Soprano Pipistrelle was observed emerging from the gable at 22:06pm (see **Figure 5.16; Plate 5.14**). There was no evidence of any additional roosting at this location or the presence of a significant roost such as a maternity roost.

No key features likely to support significant roosts are present within the study area.

Ref.	Description	Suitability	Easting (ITM)	Northing (ITM)
B_05	Residence and farm buildings. Access not available.	N/A	661750	667939
B_06	4 no. buildings here, 3 no. of them derelict. 1 no. barn used for hay storage. All have high light ingress. 2 no. structures are low suitability. No potential for significant roosts	Low	661668	667421
B_07	Residence and metal/slate roofed outbuildings. No potential roosting features visible. Shed with grey metal roof underlain with plastic. No evidence of bat use.	Low	662616	667463
B_07 a	Occupied residence. Old farm building with several outbuildings.	Low	662387	667469
B_10	Occupied residence. Modern 2-storey construction. No evidence of roosting bats from external examination.	Low	662807	667824
B_11	Access not available.	N/A	663145	667576
B_12	Access not available.	N/A	663134	667439
B_15	Occupied single story residence with 2-outbuildings.	Low	661936	667687
B_16	Metal clad shed associated with B_15	Negligible	661918	667740
B_18	Occupied modern residence with poor connectivity to wider landscape. No potential roosting features were visible.	Low	661894	666367
B_19	Corrugated iron shed. Negligible potential to support roosting bats. In regularly use.	Negligible	661944	666345
B_22	Modern metal clad agricultural building.	Negligible	660672	664524
B_24	Occupied residence and detached garage in an exposed location. Gaps present around fascia and soffit and flashing around chimney.	Low	660573	664713

Ref.	Description	Suitability	Easting (ITM)	Northing (ITM)
	No evidence of bats in garage. Residence not accessible.			
B_25	Partly constructed residence and attached garage. Residence not accessible Evidence of occasional or night roosting by bats in garage, and DNA analysis of bat droppings in garage confirmed presence of Natterer's Bat and Brown Long-eared Bat. Birds nesting in garage (Jackdaw and Swallow) and light ingress reduce likelihood of significant roost being present here.	Confirmed	660458	664611
B_30	Derelict stone building with slate roof tiles. Significant light and wind ingress. Some parts of the ceilings have collapsed. Jackdaws nesting in attic space. No evidence of use by bats.	Moderate	660565	665517
B_31	Modern farm buildings. High Light ingress.	Negligible	660320	666124
B_32	Agricultural buildings. Over 800m from nearest turbine.	Low	660120	666207
B_33	Residential dwelling. Over 700m from nearest turbine.	Low	660261	666233
B_35	No longer exists.	N/A	660905	667541
B_36	No longer exists.	N/A	661284	667605
B_37	Cluster of stone buildings. 1 no. has new corrugated metal roof. All have some level of light ingress. No evidence of roosting and considered to have low roosting potential. No potential as a significant roost. May be used occasionally as a night roost.	Low	661708	667213
B_38	Residential and agricultural building with several agricultural buildings. Slate roofing. Trees surrounding. Emergence survey carried out and a single Soprano Pipistrelle bat emerged from soffit.	Confirmed	661906	666938
B_39	No longer exists.	N/A	660650	667374
B_40	No longer exists.	N/A	660782	666562
B_41	No longer exists.	N/A	661490	666545

**Table 5.31: Description of Potential Roosting Features**



**Figure 5.16: Locations of Potential Significant Roosting Features**



Residence and Farm Building at B\_38 during emergence survey.

Bat emergence (circled in red) at B\_38 captured on thermal imaging camera.

**Plate 5.14 Views of structure where bat emergence was confirmed.**

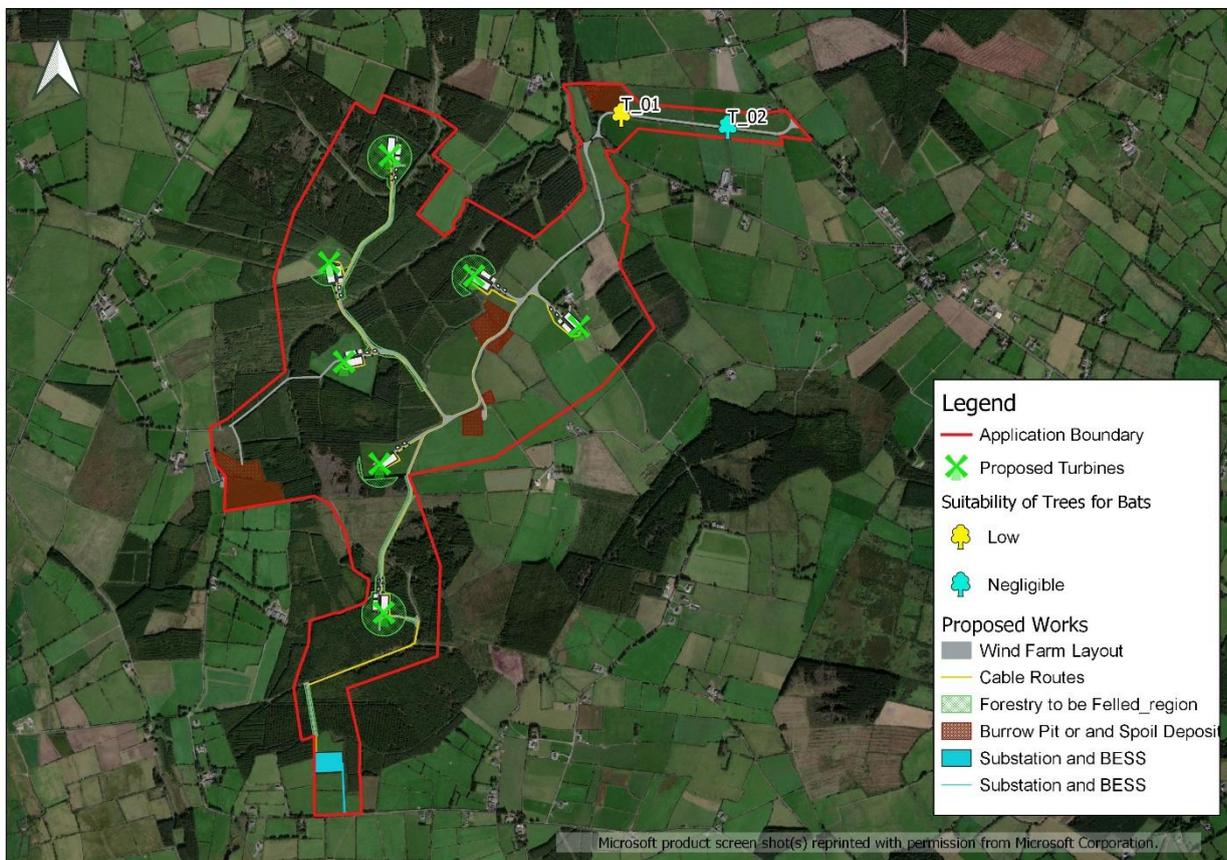
No trees were identified in the study area which were considered to have any potential to support a significant bat roost.

Trees which may be directly or indirectly affected by the project were considered for their suitability for roosting bats. Trees within the study area are generally not suitable

for roosting by bats. 2 no. trees were identified with some suitability (i.e. above 'negligible' suitability) to be used by roosting bats; however, neither will be directly affected by the project (**Table 5.32; Figure 5.17**).

Ref.	Description	Species	Suitability	Easting (ITM)	Northing (ITM)
T_01	Mature Ash, minor ivy cover. Minor PRFs visible at height	Ash	Low	662134	667795
T_02	Multi stem ash. No evidence of PRFs. Moderate ivy cover.	Ash	Negligible	662619	667738

**Table 5.32: Trees with Bat Roost Potential**



**Figure 5.17: Locations of Trees with Bat Roost Potential**

Visual survey and inspection of PRFs which may be directly or indirectly affected by the grid connection was carried out. The grid connection infrastructure will largely be within existing public roads and, therefore, the likelihood of effects occurring is generally low and relates only to construction works.

Locations where directional drilling may be required or where there is potential for interaction between existing structures and cable ducting works have been identified and these locations were surveyed to determine their suitability for roosting bats.

8 no. man-made structures were investigated which consisted of culverts and bridges. No trees with potential to be used by roosting bats which may be affected by the

proposed works were identified. Descriptions of the relevant PRFs is provided in **Table 5.33** below. Images of these PRFs are shown in **Plate 5.15**.

Ref.	Description	Suitability for roosting bats	Easting (ITM)	Northing (ITM)
Culvert 1 & 2	Plastic pipe.	Negligible	657837	656636
Culvert 3	No significant structure present.	Negligible	657484	658019
Bridge 1	Single culvert. Structure provides approx. 500mm above normal water level. Some minor PRFs present but lack of height reduced value to bats.	Low	657312	658685
Bridge 2	Structure provides little gap to normal water level.	Negligible	656828	660149
Bridge 3	Single arch stone structure, approx. 2m height. Some minor crevices present. No evidence of roosting bats.	Low	657115	660610
Culvert 4&5	No significant structure present.	Negligible	660358	664568

**Table 5.33: Description of Potential Roosting Features along Grid Connection Route**

	
Building at B_37	Building at B_30



Building at B\_06



Interior of a building at B\_06



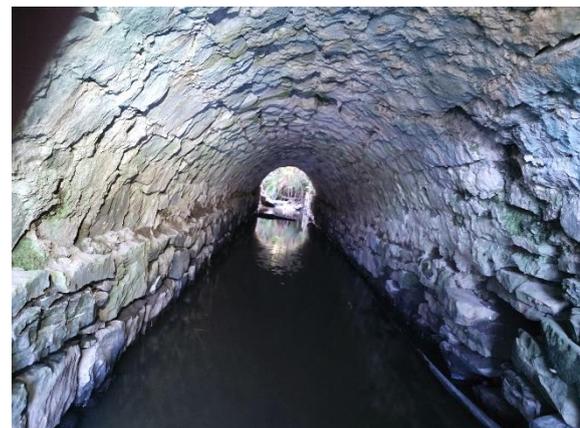
Farm Building at B\_38



Abandoned Residence at B\_25



Inspection of Bridge 2.



Barrel of Bridge 1.

	
<p>Tree T_02.</p>	

**Plate 5.15: Selection of the PRFs Inspected**

Black Bridge was visually assessed for signs of its use by roosting bats (April 2022). There are some minor PRFs present, but no signs of roosting bats were recorded. The River Dinin (South) at Black Bridge is attractive for foraging bats. The works at the junction of the N78/L1834 will encompass areas of low hedgerow and open agricultural field. There are a small number of trees present, none of which were assessed as having appreciable roost potential for bats (April 2022).

5.3.5 Aquatic Ecology

5.3.5.1 Physical Characteristics and Fish Habitat

Coolcullen Stream

As the Coolcullen Stream passes through the project site, the characteristics of the riverine habitats are mainly shallow riffles and glides, suited to juvenile trout and salmon as rearing habitat. In the upper section, which drains the southeastern part of the project site, the stream runs through a conifer plantation; while, as the stream flows through the site, it flows mainly through farmland where riparian cover is mediocre to poor and is mostly grassy verge (GS2) with some riparian bramble scrub (WS1). The riverbed is coarse, consisting mainly of cobbles and large gravels, and is largely free of surface siltation except for within and immediately downstream of areas where cattle are poaching. There appears to have been some mechanical disturbance in the past, possibly the excavation of stream bed gravel for the building of roads, however, this happened many years ago and the stream has recovered well. The usual agricultural drainage schemes are in place and draining to the stream; however, for the most part, they are not actively maintained and are attenuating sediment and nutrients. Agriculture in the catchment is medium-to-low intensity, and this is benefiting the stream greatly in terms of water quality and invertebrate and fish assemblage.

In terms of fisheries habitats, there are some holding pools and spawning areas for adult trout. These are largely free of siltation and hence an oxygen rich intra-gravel zone is available for the development and refuge of eggs and alevins. Rearing areas for juvenile salmonids are plentiful, and this is reflected in the findings of the fish survey below. The stream is considered to be too small for spawning adult salmon. There is some reasonable eel habitat with submerged large stones and overhanging banks.

There is almost no stable optimal lamprey ammocoete habitat within this section of the watercourse; it is limited by the stream's high energy nature.



**Plate 5.16: Coolcullen Stream as it leaves the Project Site (image captured during high water levels)**

#### Knocknabranagh & Knockbaun Stream

The Knocknabranagh & Knockbaun Stream rises within the wind farm site where it begins as a mountain drain cutting through land which is mainly planted upon with sitka spruce. Generally, the spruce is blocking out light in a manner that prevents the growth of riparian vegetation and the stream mainly runs through pine needle clad plantation floor. This upper section is quite flat, and the stream has a low flow velocity and volume. Instream habitats are unvaried; generally a slow glide and the stream bed consists of a light dusting of sandy gravel on top of peaty material. There is very little spawning opportunity here, and the stream is likely to contain only very low numbers of trout and possibly eel. Additionally, the lack of light and riverbed substrate combine to produce a section of watercourse which exhibits low productivity in terms of macroinvertebrates.

The middle and lower stretches of the Knocknabranagh & Knockbaun Stream is in excellent condition hydromorphologically. It is an example of a high-quality mountain stream. There are riffles, pools and glides in optimal proportions, providing a good variety of habitats for juvenile salmonids and for resident adult brown trout. The stream is considered too small for spawning adult salmon. There is reasonable eel habitat with submerged large stones and overhanging banks. There is almost no stable optimal

lamprey ammocoete habitat within this section of the watercourse; it is limited by the stream's high energy nature and low fine sediment input.

Riparian vegetation in the middle and lower section is mainly overhanging rush and bramble often characteristic of these upland streams. In general, it is shallow set within its floodplain, which offers very good connectivity with the floodplain. Various wetland habitats border the stream throughout the stretch of stream draining the proposed development site. These exclude livestock from the watercourse while also attenuating nutrients and buffering the amplitude of floods and droughts. From the walkover survey, there is no evidence of any attempts at river channel modification on the main channel of the stream and no arterial drainage appears to have been carried out. The usual agricultural drainage schemes are in place; however, for the most part, they are not actively maintained and are attenuating sediment and nutrients. In summary, the traits described above combine to maintain this section of the watercourse in a highly natural state.



**Plate 5.17: Knocknabranagh & Knockbaun Stream within the Project Site**

### 5.3.5.2 Electrofishing Surveys



**Figure 5.18: Electrofishing Sites**

#### Coolcullen River

The Coolcullen River site was selected at the L7122 bridge crossing approximately 300m downstream of the confluence of the Coolcullen and Knocknabranagh & Knockbaun streams (**Figure 5.18**). The abiotic parameters at the sampling site are summarised in **Table 5.34**. Brown trout *Salmo trutta*, salmon *Salmo salar* and eel *Anguilla anguilla* were captured at this site. A single eel was captured and measured at 26.7cm. A total of 43 no. trout and 7 no. salmon were caught within a 30m stretch of river accounting for 105m<sup>2</sup> of river which was electrofished. This equates to 0.41 trout/m<sup>2</sup> and 0.04 salmon/m<sup>2</sup>. The average trout length was 6.24cm and the median was 5.8cm. The standard deviation for trout was 1.4 indicating that the age profile was quite limited. The average salmon length was 7cm and the median was 6.1cm. The standard deviation for salmon was 1.8 indicating that the age profile was varied. The age profile is shown in the graph below (**Figure 5.19**).

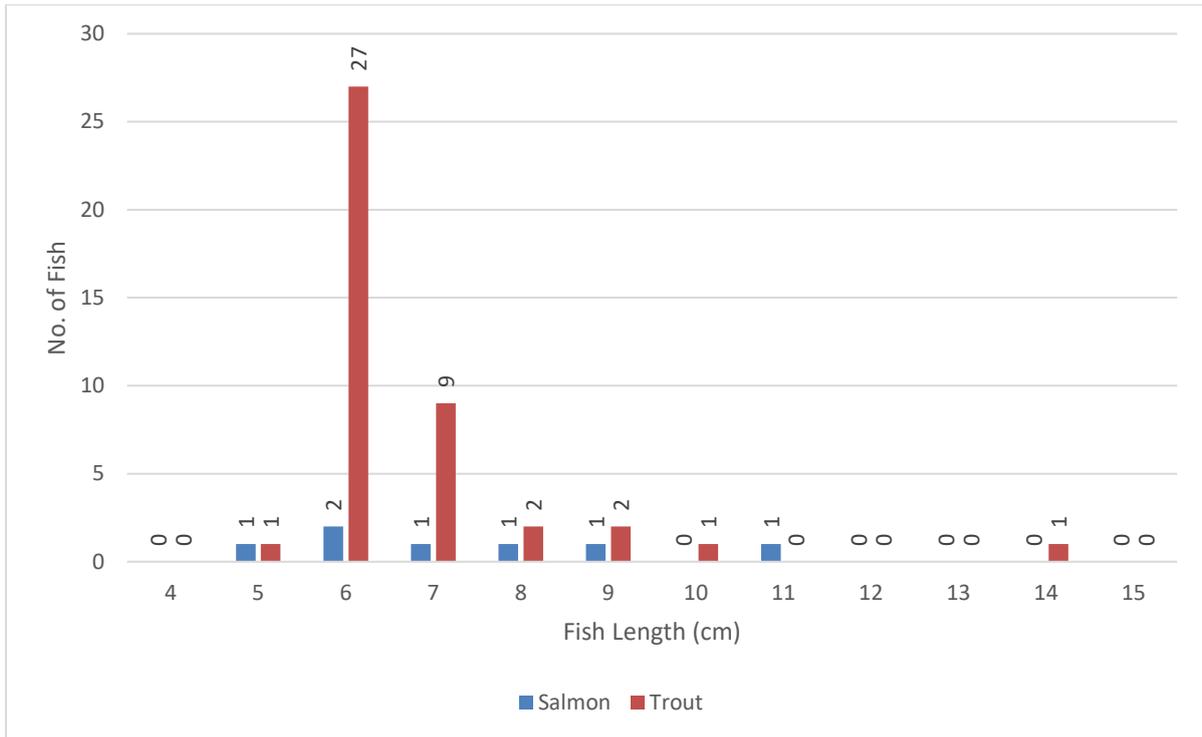


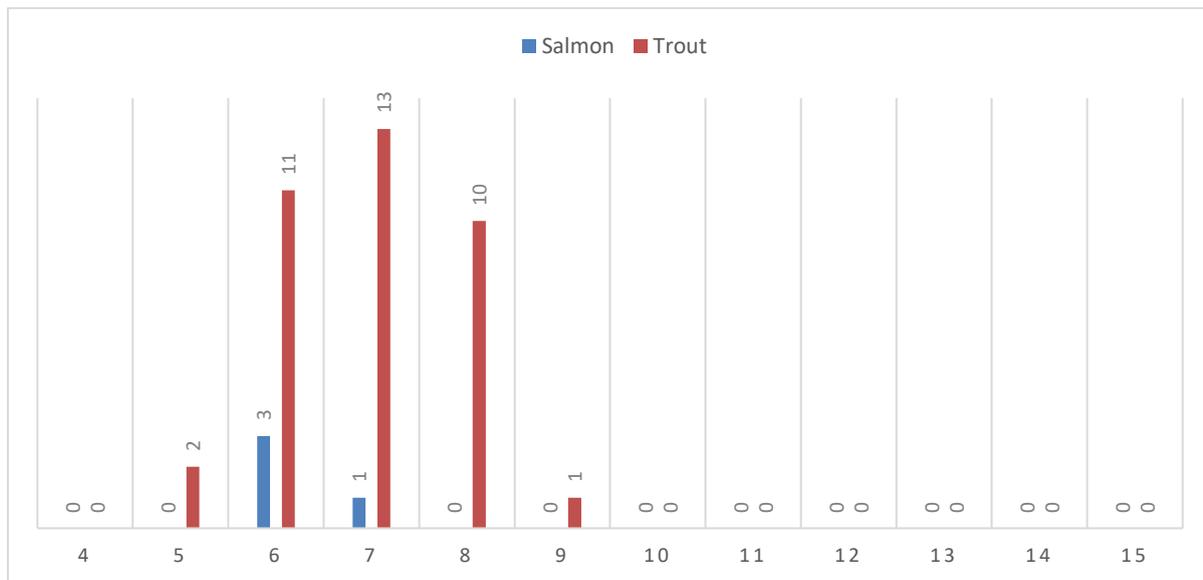
Figure 5.19: Age Profile of salmon and trout at Coolcullen River



Plate 5.18: Salmon (top row) and Trout (bottom row) captured at the Coolcullen River site

### Coolcullen Stream

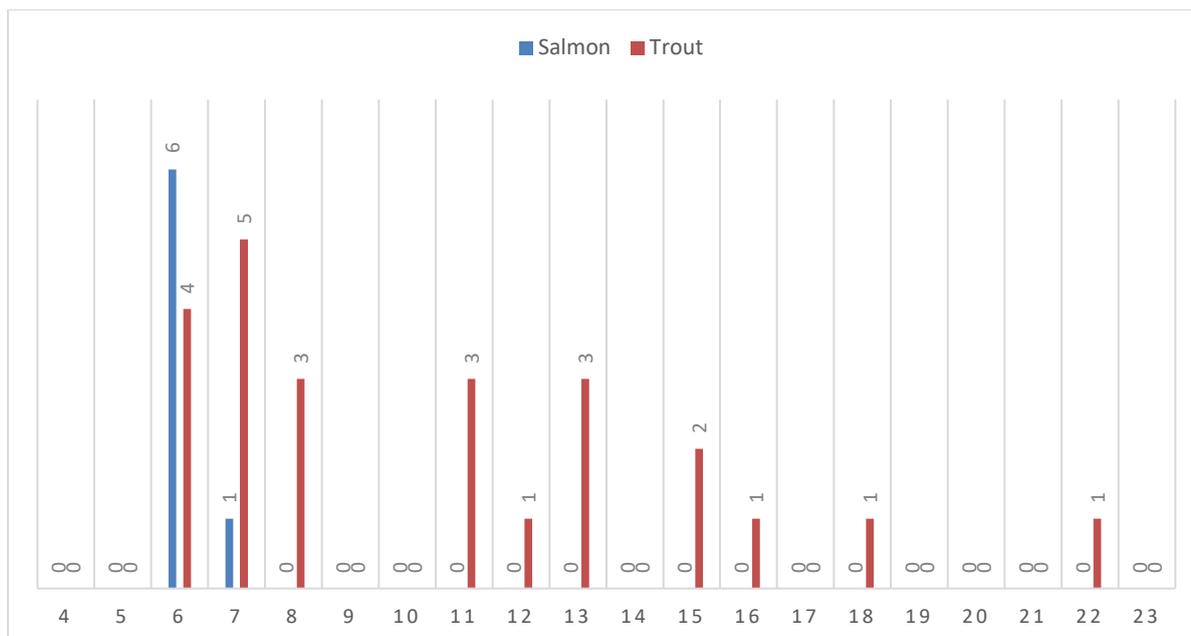
The electrofishing site on the Coolcullen Stream was selected 500m upstream of the confluence with the Knocknabranagh & Knockbaun Stream (**Figure 5.18**). The abiotic parameters at the sampling site are summarised in **Table 5.34**. Brown trout and salmon were captured at this site. A total of 37 no. trout and 4 no. salmon were caught within a 22m stretch of river accounting for 26.4m<sup>2</sup> of river which was electrofished. This equates to 1.4 trout/m<sup>2</sup> and 0.15 salmon/m<sup>2</sup>. The average trout length was 6.4cm and the median was 6.51cm. The standard deviation for trout was 0.89 indicating that the age profile was quite limited. The average salmon length was 5.65cm and the median was 5.45cm. The standard deviation for salmon was 0.65 indicating that the age profile was very limited. The age profile is shown in the graph below (**Figure 5.20**).



**Figure 5.20: Age profile of salmon and trout at the Coolcullen Stream.**

### Knocknabranagh & Knockbaun Stream

The electrofishing site on the Knocknabranagh & Knockbaun Stream was selected 50m upstream of the confluence with the Coolcullen Stream (**Figure 5.18**). The abiotic parameters at the sampling site are summarised in Table 5.34. Brown trout and salmon were captured at this site. A total of 24 no. trout and 7 no. salmon were caught within a 20m stretch of river accounting for 24m<sup>2</sup> of river which was electrofished. This equates to 1 trout/m<sup>2</sup> and 0.29 salmon/m<sup>2</sup>. The average trout length was 10cm and the median was 9cm. The standard deviation for trout was 4.42 indicating that the age profile was varied. The average salmon length was 5.6cm and the median was 5.6cm. The standard deviation for salmon was 0.38 indicating that the age profile was very limited. The age profile is shown in the graph below (**Figure 5.21**).



**Figure 5.21: Age profile of salmon and trout at the Knocknabranagh & Knockbaun Stream.**

Parameter	Coolcullen River Site	Coolcullen Stream Site	Knocknabranagh & Knockbaun Stream Site
Length fished	30	22	20
Time Fished (mins)	10	5	5
Width (m)	3.5	1.2	1.2
Mean depth (cm)	4	4	5
Maximum depth (cm)	15	20	55
Bed rock (%)	95	-	-
Boulder (%)	-	15	10
Cobble (%)	-	55	50
Gravel(%)	5	25	30
Sand (%)	-	5	10
Silt (%)	-	-	-
Siltation (clean/slight/moderate/heavy/not visible)	Slight	Slight	None
Plume (heavy/moderate/slight/none)	None	Slight	Slight
Riffle (%)	60	50	15
Pool (%)	10	40	80
Glide (%)	30	10	2

Parameter	Coolcullen River Site	Coolcullen Stream Site	Knocknabran agh & Knockbaun Stream Site
Plant cover (%)	20	10	15

**Table 5.34: Sampling Site Descriptions – Abiotic Parameters.**

11 no. sites were surveyed in the Dinin River catchment during July and August 2017 by IFI<sup>8</sup>. 6 no. fish species were recorded overall in the Dinin River catchment comprising brown trout (9 no. sites) salmon (9 no. sites), European eel (1 no. site), minnow (4 no. sites), stone loach (10 no. sites), three-spined stickleback (4 no. sites). Interestingly, no lamprey species were captured. Brown trout and salmon were the most abundant species captured. 4 no. age classes for brown trout (0+, 1+, 2+ and 3+) were present, with 0+ the most abundant cohort. 2 no. age classes for salmon (0+ and 1+) were present, with 0+ again the most abundant cohort. European eel were captured at Site 11, only.

Sites 5, 6, 7 and 8 were within the River Dinin (South) catchment. 4 no. species were captured within this catchment comprising brown trout (3 no. sites) salmon (3 no. sites), minnow (1 no. site), stone loach (3 no. sites). Site 5 was on the Coolcullen River at Phillips Bridge, approximately 1.2km downstream of the project site. The highest density of salmon captured during that was at Site 5 on the Coolcullen River, with approximately equal numbers of trout and salmon captured. Site 6, which was the Dinin South main channel, had similar ratios of trout and salmon. This is in stark contrast to the ratio of trout and salmon captured during the current electrofishing survey, where there were approximately 5 no. trout for each salmon captured on average across all 3 no. sites, and approximately 6 no. trout for each salmon captured at the Coolcullen River Lower Site which is just 1km upstream of the 2017 Site 5 at Phillips Bridge.

The likely reason for this, which was identified during the site walkover, and has also been identified by the Nore Suir River Trust<sup>9</sup>, is a fish passage issue at Coan Bridge, approximately 4km downstream of the project site. The apron of Coan Bridge is completely impassable to fish as it is a multi-tiered shallow laminar flow with no plunge pool on each tier to give migrating fish a break and to give them the depth needed to leap to the next tier. Therefore, passage at Coan Bridge depends completely on the fish pass, which is a Denil style fish pass.

The Denil fish pass does not create a series of separate pools, like many other fish pass designs, instead it uses a series of symmetrical, closely-spaced, upstream-sloping, U-shaped baffles. These baffles turn the flow upon itself at the base of the baffle and create a low velocity zone that fish use to ascend. However, at Coan Bridge, the cavities created by the U-shaped baffles have been filled in with mobile river gravel, and the fish pass has become a shallow riffle. Additionally, at the head of the fish pass, there was a gravel bar deposit and a number of boulders which were directing the flow away from the fish pass and diverting the necessary flow volumes to attract migrating fish to the base of the fish pass. Although this is not a total barrier to fish passage, it is certainly a partial barrier. Full functionality of this fish pass would require

<sup>8</sup> [http://wfdfish.ie/wp-content/uploads/2019/03/SERBD\\_Dinin\\_2017.pdf](http://wfdfish.ie/wp-content/uploads/2019/03/SERBD_Dinin_2017.pdf)

<sup>9</sup> [http://www.noresuirrivertrust.org/files/norebarriermigrationstudyver1\\_3.pdf](http://www.noresuirrivertrust.org/files/norebarriermigrationstudyver1_3.pdf)

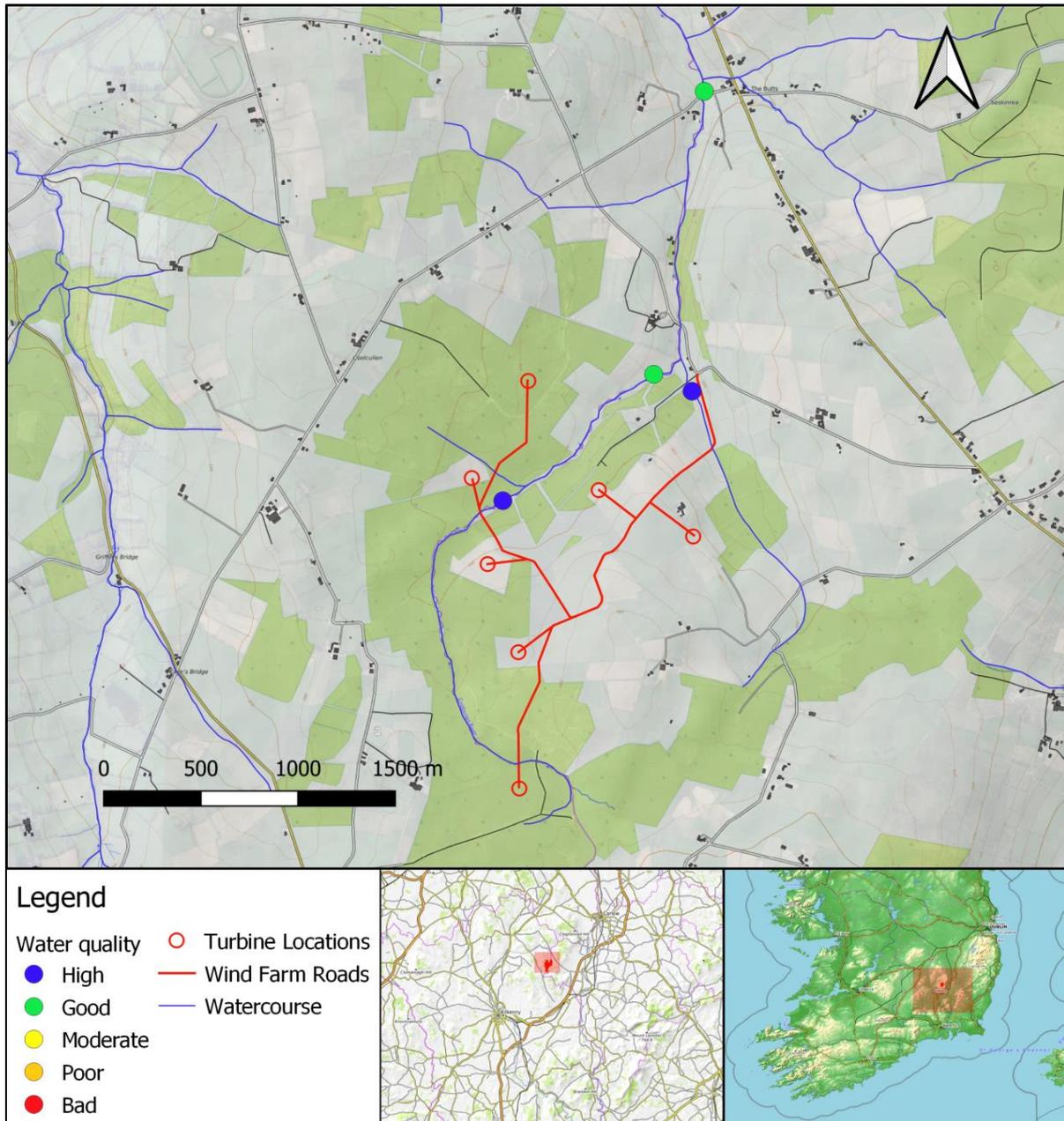
maintenance or a design upgrade but would open up 10+km of excellent spawning habitat and 30+km of excellent rearing habitat for salmon within the Nore Catchment.



**Plate 5.19: Fish Pass and Bridge Apron at Coan Bridge**

#### 5.3.5.3 Biological Water Quality Analysis

A total of 4 no. biological water quality sample sites were selected; one on the Coolcullen Stream, 2 no. on the Knocknabranagh & Knockbaun Stream, and 1 no. downstream of the confluence of the 2 no. on the Coolcullen River at Phillips Bridge (**Figure 5.22**). A further 3 no. biological water quality sample sites were selected along the grid connection route and are discussed below. The Coolcullen Stream had a Q-Value of Q4-5; this was measured 100m upstream of the confluence with the Knocknabranagh & Knockbaun Stream. The Knocknabranagh & Knockbaun Stream had a Q rating of Q4-5 at the upper site immediately downstream of the watercourse crossing between turbines T5 and T6, and Q4 at the lower sampling site which was 70m upstream of the confluence with the Coolcullen Stream. The Coolcullen River scored Q4 at Phillips Bridge; this score was considered to be at the upper side of the Q4 strata, close to the boundary with Q4-5.

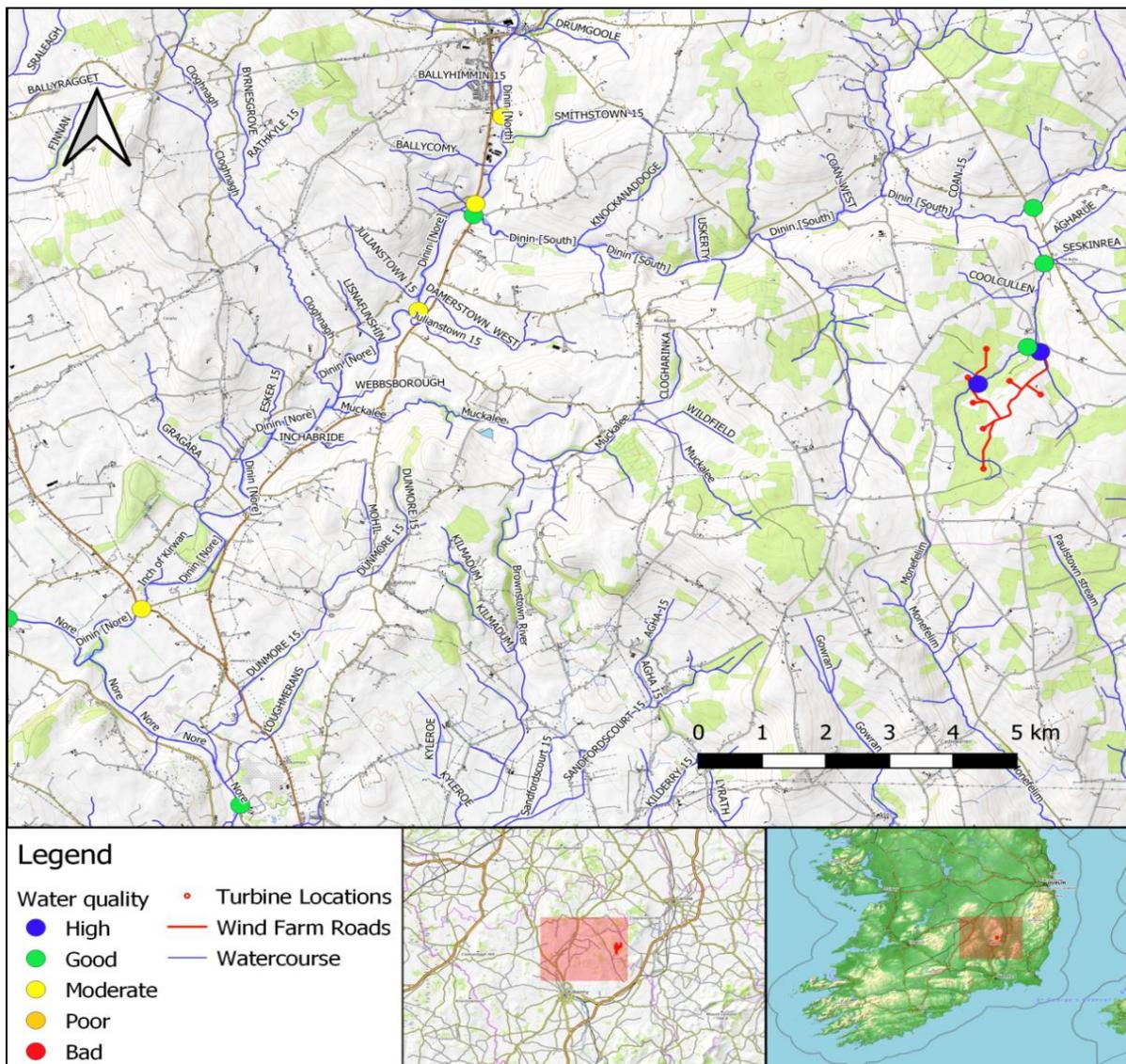


**Figure 5.22: Biological Water Quality Analysis within and downstream of the Wind Farm**

In terms of the rest of the South Dinin subcatchment, there are 2 no. national water quality monitoring stations; 1 no. upstream of the confluence with the Coolcullen River and therefore not hydrologically connected to the project site, and one 300m upstream of the confluence with the North Dinin subcatchment (**Figure 5.23**). Both of these have scored Q4 in the most recent round of water quality sampling in the area in 2019. Both sites have remained relatively stable around Q4 since the mid-late 1980's, each occasionally scoring Q3-4 or Q4-5 before returning to Q4 in the following round of sampling. Downstream from this, along the length of the Dinin Main Channel<sup>10</sup>, there

<sup>10</sup> The Dinin Main Channel is the length of channel between the confluence of the Dinin South and Dinin North at the upstream end, and the point at which the Dinin flows into the Nore; a stretch of approximately 11km.

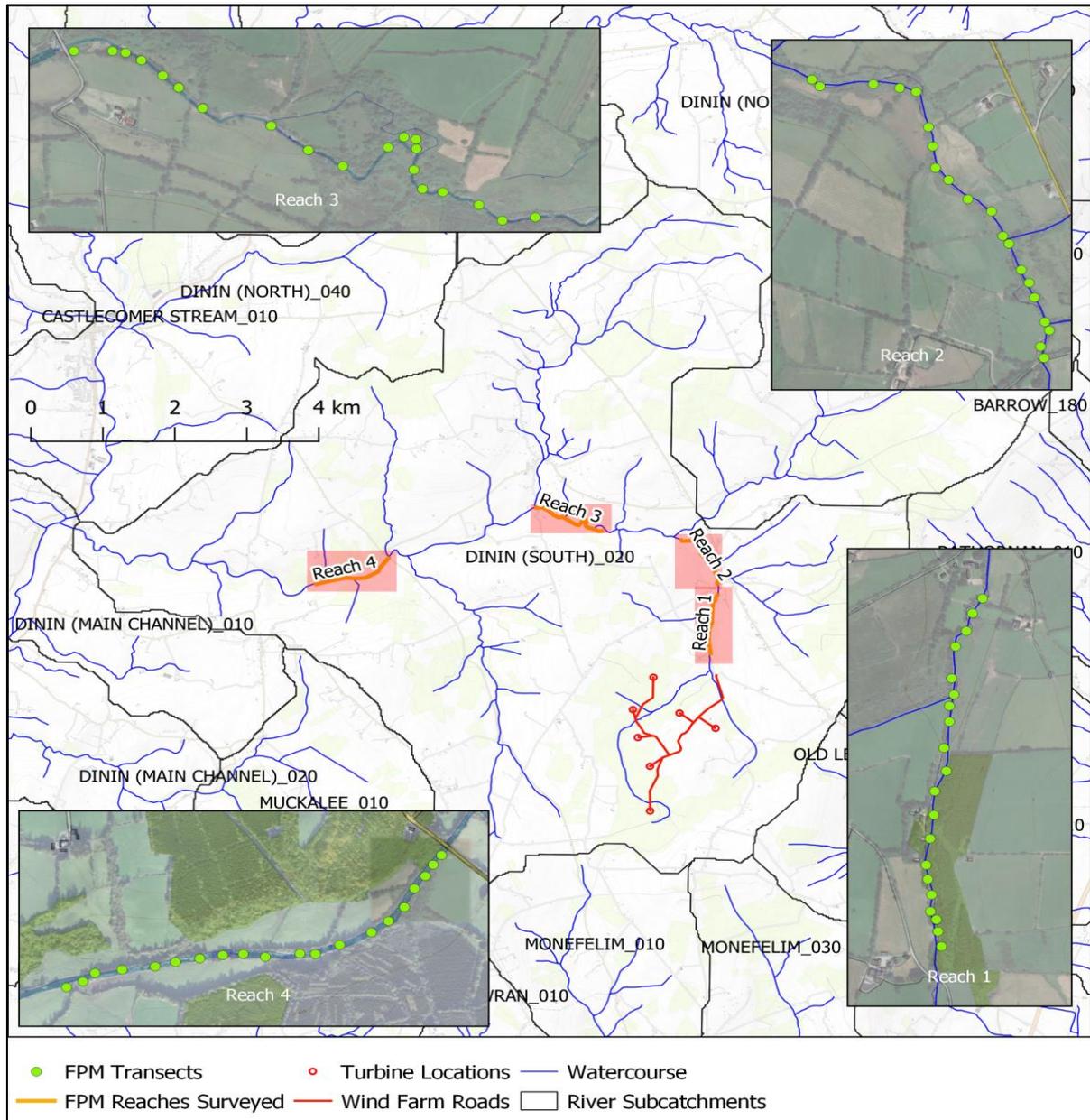
are 2 no. national water quality monitoring stations. One of these is at Lisnafunshion, approximately 200m downstream of the confluence between the Dinin North and South subcatchments, and the other is at Dinin Bridge on the N77, c. 1.2km upstream from the confluence with the Nore. Both of these stations have attained a Q-Value of Q3-4 in the latest two rounds of sampling, and they have been alternating between Q3-4 and Q4 for the since the mid-1980s. In summary, water quality deteriorates as the river flows downstream, this is a typical trait of Irish rivers as the farming intensity and human habitation increase from the uplands to the lowlands.



**Figure 5.23: Biological Water Quality within the Dinin Catchment**

5.3.5.4 Freshwater Pearl Mussel

A total of 4 no. 'reaches' were surveyed for freshwater pearl mussel (FPM; **Figure 5.24**). 20 no. cross-river transects were carried out at each reach, giving a total of 80 no. transects completed within a total of c. 4.5km of channel length, which represents a significant proportion of the South Dinin watercourse downstream of the project site. The Coolcullen and Knocknabranagh & Knockbaunstreams were assessed to be too small to support a population of FPM, and so no transects were carried out within them.



**Figure 5.24: FMP Survey Reaches**

No FPM were observed during the survey. The stretches examined were deemed representative of the river as a whole and a variety of microhabitats were surveyed (e.g. clean substrates in riffle, glide and pool under partial and full shade). No evidence of FPM in the form of shells were recorded during the field investigations, despite extensive searches on deposits at the leeward side of bends.

The NBDC have no records of FPM in the Dinin Catchment<sup>11</sup>. The underlying bedrock is classified as 'Westphalian shale, sandstone, siltstone & coal' according to the GSI Bedrock Geology database. According to the GSI rock unit groups (1:100,000 resolution), approximately half of the catchment of the Dinin South is Westphalian and Namurian Sandstone, and the rest is Westphalian Shale. Using criteria in Anon (2004), the Dinin South is classified as a moderate priority river for FPM, i.e. 'rivers with no prior

<sup>11</sup> <https://maps.biodiversityireland.ie/Species/123483>

records but with either igneous or sandstone bedrock underlying at least one third of their length; rivers flowing from lakes.<sup>1</sup>

Although the water chemistry is suitable for FPM, some of the physical parameters appear to render the stretch of watercourse surveyed unsuitable, particularly the presence of excessive mobile gravels and the highly erosive nature of the watercourse. Downstream of the confluence of the Coolcullen and Knocknabranagh & Knockbaun streams, signs of erosion are plentiful and, in places, severe. Banks of freshly exposed soil and subsoil are a common feature of the river corridor, as are man-made attempts to remediate such erosion. Large embankments of deposited gravels are very common, with many instances of evidence to suggest that the gravels become mobile on a regular basis<sup>12</sup>. *Ecology of the Freshwater Pearl Mussel* (Skinner *et al.*, 2003) states on multiple occasions that good riverbed stability is an important parameter for the presence of FPM, and only a small proportion of the watercourse was found to be stable during the FPM survey. Additionally, Skinner *et al.* (2003) claim that gradient could affect mussel distribution indirectly by determining the stability of the substrata, and that an intermediate gradient range of 0.8–3 m/km was preferred. The stretch of watercourse surveyed downstream of the project site has a gradient ranging from 8m/km to 20m/km, while the Coolcullen and Knocknabranagh & Knockbaun streams within the wind farm site have a gradient of over 20m/km. Anon (2004) suggests that the watercourse should be 200m altitude or below. The entire Coolcullen and Knocknabranagh & Knockbaun streams channels as well as much of Reach 1 is above 200m altitude. These physical and hydromorphological traits of the watercourse suggest that the stretch of watercourse surveyed may not be suitable for FPM.

In the *Conservation Objectives* document for the River Barrow and River Nore SAC (NPWS, 2011) it states that “*The status of the freshwater pearl mussel (Margaritifera margaritifera) as a qualifying Annex II species for the River Barrow and River Nore SAC is currently under review. The outcome of this review will determine whether a site-specific conservation objective is set for this species.*” This document provides no additional detail as to the presence or whereabouts of this species within the Barrow/Nore Catchments. As previously stated, the NBDC has no records of FPM within the Dinin Catchment.

There are records of FPM within the Nore Catchment (NBDC, 2022) and they are records of *Margaritifera durrovensis*, the Nore freshwater pearl mussel, a species only known to the Nore River. The population stretches from Poorman's Bridge (ITM E640642 N685937) to Lismaine Bridge (ITM E644141 N666041), with most of the population found between Poorman's Bridge and the Avonmore Creamery above Ballyragget (ITM E643941 N672240; NPWS, 2011). This stretch of river (>15km west of the wind farm site) is entirely upstream of the confluence with the Dinin River and, therefore, this population is not hydrologically connected with the project.

#### 5.3.5.5 Watercourse Crossings at Wind Farm

##### Stream Crossing No.1

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<sup>12</sup> E.g. river gravel freshly deposited in tractor ruts at crossings, or on top of vegetation which was still alive and green underneath.

This proposed crossing of the Coolcullen Stream (located proximate to the temporary construction compound) is at the site where the electrofishing along this stream was carried out. It is approximately 500m upstream of the confluence with the Knocknabranagh & Knockbaun Stream. The riverine habitats are mainly shallow riffles and glides. The riverbed is coarse, consisting mainly of cobbles and large gravels, and is largely free of surface siltation. Riparian cover is mediocre to poor and is mostly grassy verge (GS2) with some riparian bramble scrub (WS1), and cattle have access to the river at a number of places. The hydromorphology appears to have been somewhat affected by mechanical means (likely gravel extraction) in the past. The crossing site is suited to juvenile trout and salmon as rearing habitat. There is no suitable lamprey ammocoete habitat; while some marginally suitable eel habitat is present. It is proposed to place a suitably sized box culvert at this crossing.

### Stream Crossing No.2

This proposed crossing of the Knocknabranagh & Knockbaun Stream (between turbines T5 and T6) is approximately 1.4km upstream of the confluence with the Coolcullen Stream. This stretch of the western stream is in excellent condition hydromorphologically. It is an example of a high-quality mountain stream. There are riffles, pools and glides in optimal proportions, providing a good variety of habitats for juvenile salmonids and for resident adult brown trout. The stream is considered too small for spawning adult salmon. There is reasonable eel habitat with submerged large stones and overhanging banks. There is almost no stable optimal lamprey ammocoete habitat within this section of the watercourse; it is limited by the stream's high energy nature and low fine sediment input. It is proposed to place a suitably sized box culvert at this crossing.

### Stream Crossing No.3

This proposed crossing is of a small first order tributary of the Knocknabranagh & Knockbaun Stream (located between turbines T6 and T7). This watercourse is present on OSI mapping, however, it is essentially a drainage ditch with a steady flow. It has been modified by straightening and most likely deepening, and is part of an extensive drainage network, some of which was created as part of the conifer plantation through which it flows. This stream crossing site most likely contains a small population of juvenile salmonids and may contain some eel. There is no lamprey ammocoete habitat. It is proposed to place a suitably sized box culvert at this crossing.

### Stream Crossing No.4

This crossing is of the upper reaches of the Knocknabranagh & Knockbaun Stream (between turbines T3 and T4). At the crossing, the stream is a mountain drain cutting through 1-2m of surrounding terrain which is planted upon with sitka spruce. The spruce is blocking out light in a manner that prevents the growth of riparian vegetation. This section of stream is quite flat, and the stream has a low flow velocity and volume. Instream habitat is an unvaried slow glide, and the stream bed consists of a light dusting of sandy gravel on top of peat. There is very little spawning opportunity here, and the stream is likely to contain only very low numbers of trout and possibly eel.

### Stream Crossing No.5

This crossing is of the Knocknabranagh & Knockbaun Stream, between turbine T5 and the western spoil deposition area, where an existing forestry/agricultural track crosses the stream at a shallow water crossing. Apart from the existing road crossing, this

stretch of stream is in excellent condition hydromorphologically, providing a good variety of habitats for juvenile salmonids and for resident adult brown trout. There is no lamprey habitat at the crossing. It is proposed to place a bottomless culvert here without modifying the riverbed.

#### 5.3.5.6 Watercourse Crossings along Grid Connection Route

The cable route crosses a number of water features along its c. 15km length. Three of these are to be crossed using HDD, as the deck of the bridge does not have sufficient depth capacity to allow for a trench to carry the cable through. Others have sufficient bridge deck depth capacity and the cable trench will simply be continued through the bridge deck. In total, only 4 no. crossings are made across water features of ecological interest; the 3 no. crossings using HDD and 1 no. trench crossing. Other water features are drainage ditches with either low flow or no flow under normal conditions

HDD1 and 2 cross the Lyrath Stream. HDD2 crosses in the townland of Feathallagh where the stream is a 1<sup>st</sup> order stream of moderate steepness. It consists of quite mobile gravels which interact with instream woody debris to create diverse instream habitats. The stream is in good condition hydromorphologically and does not appear to have been subject to major mechanical disturbance. A biological water quality sample was taken here and afforded the watercourse a score of Q3-4.

HDD1 crosses in townland of Kilmagar approximately 1.6km downstream of HDD2. The stream is still quite small here and is a 2<sup>nd</sup> order stream. At this point, the stream is a low gradient stream, more typical of lowlands, and is erosional/depositionally neutral. There was, however, at the time of surveying, rolling mounds of coarse sand/fine gravel migrating at a steady rate downstream. This unusual phenomenon was attributed to severe and extensive earthworks c. 700m upstream of the site, where a field of ~2 hectares bordering the stream was being drained including extensive instream and riparian excavation and realignment of the stream. Attaining the Q-value at the lower site produced large plumes of silt which had no doubt been exacerbated by the recent upstream works; however, it is thought that this section of stream has pre-existing background levels of siltation due to the presence of tillage farming, some of which extends to the brow of the riverbank. The stream was given a score of Q2-3 at this site. This stream is suitable for trout and eel and may contain a resident population of brook lamprey in its lower reaches.

HDD3 and 1 no. of the trench crossings cross the Kilderry\_15 stream, both in the townland of Ballysallagh/Feathallagh. Both crossings are in close proximity to one another. The stream is a fast-flowing, highly erosive upland stream which experiences large amplitude spate floods as evidenced by the features of erosion and general hydromorphological condition of the stream. The catchment is steep, and land use is mainly upland farming. This section of the Kilderry\_15 stream is suitable for juvenile trout and may contain small populations of eel. The high energy nature of the stream in this section ensures that there is no accumulation of the silt beds necessary for the presence of lamprey. The apron of the bridge under which HDD3 is crossing, and another feature immediately downstream, are likely to be impassable to fish, meaning that upstream of this, any fish population is extremely vulnerable to pollution events and/or drought events as re-population would not be possible. The wooded nature of the river corridor is offering excellent shading. The watercourse was given a score of Q4 (upper boundary).

#### Aquatic Ecology at Haul Route Works Locations

The works on Black Bridge will not require any in-stream works or interference with any natural features on the riparian corridor. The stream crossing was visited and no signs of Otter were recorded at or near this bridge crossing.

The proposed works on the junction of the N78/L1234 are not in proximity to any watercourse.

### Aquatic Ecology at Replant Lands

The replant lands are dominated by agricultural grassland and there is no significant watercourse located within the site. The lands are located within the Fane subcatchment (SC-010). The County (Water) River is located c. 200m to the south of these lands. EPA Q-Ratings from upstream and at Wallace's Bridge taken in 1997 recorded a 'Poor' (Q3) biological water quality status. However, the most recently available data from another station, upstream of Wallace's Bridge and close to the replant lands recorded a Q4 (Good) biological water quality in 2020. This stretch of river also achieved a moderate WFD status (2013-2018; [www.epa.ie](http://www.epa.ie)).

#### 5.3.6 Other Taxa

A desktop review of the other taxa that have been recorded in the grid squares in which the project site is located was carried out. **Table 5.35** presents the Invertebrate fauna that have been recorded in the 2km Grid Squares which encompass the project site.

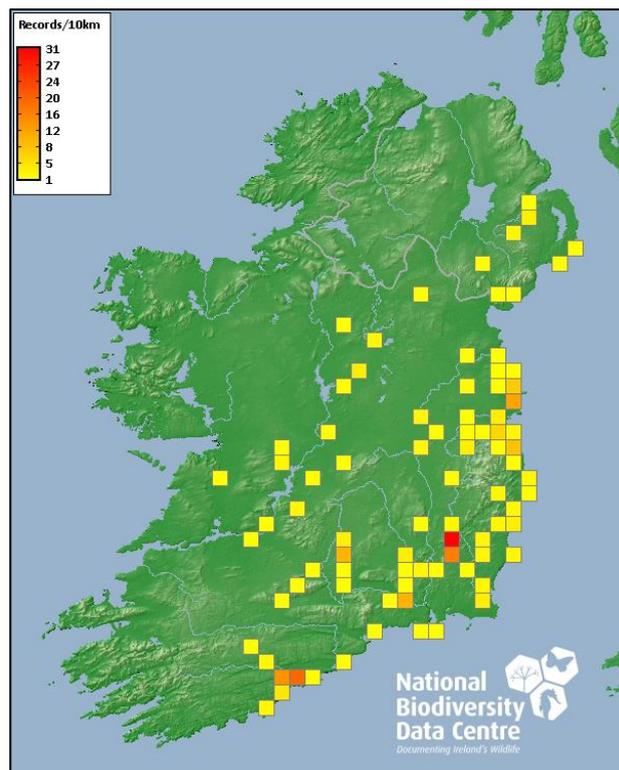
Gooden's Nomad Bee, *Nomada goodeniana* is an endangered species that has historically been recorded in Grid Square S66C. This species is most frequently recorded in the east and southeast of the country (**Figure 5.25**).

Common Name	Scientific Name	Grid Square Recorded	Conservation Status	Species group
7-spot Ladybird	<i>Coccinella septempunctata</i>	S66I	Least concern	Coleoptera
Cherry Fruit Moth	<i>Argyresthia pruniella</i>	S66C	Least concern	Lepidoptera
Comma	<i>Polygonia c album</i>	S66D	Least concern	Lepidoptera
Common Carder Bee	<i>Bombus (Thorabombus) pascuorum</i>	S66D	Least concern	Hymenopteran
Dingy Skipper	<i>Erynnis tages</i>	S66C, S66I	Threatened Species: Near threatened	Lepidoptera
Garden Tiger	<i>Arctia caja</i>	S66C	Least concern	Lepidoptera
German Wasp	<i>Vespula paravespula germanica</i>	S66C	Least concern	Hymenopteran
Gooden's Nomad Bee	<i>Nomada goodeniana</i>	S66C	Threatened Species: Endangered	Hymenopteran

Common Name	Scientific Name	Grid Square Recorded	Conservation Status	Species group
Green veined White	<i>Pieris napi</i>	S66C, S66I	Least concern	Lepidoptera
Large White	<i>Pieris brassicae</i>	S66I	Least concern	Lepidoptera
Meadow Brown	<i>Maniola jurtina</i>	S66C	Least concern	Lepidoptera
Orange tip	<i>Anthocharis cardamines</i>	S66D, S66C, S66I	Least concern	Lepidoptera
Peacock	<i>Inachis io</i>	S66I	Least concern	Lepidoptera
Red necked Footman	<i>Atolmis rubricollis</i>	S66C	Least concern	Lepidoptera
Ringlet	<i>Aphantopus hyperantus</i>	S66C	Least concern	Lepidoptera
Silver Y	<i>Autographa gamma</i>	S66I	Least concern	Lepidoptera
Small Garden Bumble Bee	<i>Bombus (Megabombus) hortorum</i>	S66D	Least concern	Hymenopteran
Small Tortoiseshell	<i>Aglais urticae</i>	S66I	Least concern	Lepidoptera
Small White	<i>Pieris rapae</i>	S66I	Least concern	Lepidoptera
White Ermine	<i>Spilosoma lubricipeda</i>	S66I	Least concern	Lepidoptera
Wood White	<i>Leptidea sp.</i>	S66C	Not threatened	Lepidoptera

**Table 5.35: Terrestrial invertebrate species recorded in the 2km Grid Squares**

Marsh Fritillary has been recorded from Grid Square S56, but there have been no records from S66. Common Frog, *Rana temporaria* and Smooth Newt, *Lissitron vulgaris*, have both been recorded in the 10km Grid Square in which the wind farm will be located. Smooth Newt has been recorded at Baurnafea (c. 1km southwest of the wind farm site) in 2018 and they have also been recorded from near Bagenelstown.



**Figure 5.25: Distribution of Gooden’s Nomad Bee (National Biodiversity Data Centre, Ireland)**

### 5.3.6.1 Casual Records

Common Frog was recorded on several occasions during VP surveys in each survey season. Smooth Newt was not recorded but it is likely to occur in small areas of suitable habitat. Common Frog was recorded in wet grassland habitat in the study area during the botanical and habitat surveys. No breeding signs were recorded and there are limited features within the study area for breeding frogs.

Surveys in late August 2021 for evidence of larval webs in areas with Devil's Bit Scabious did not record the presence of any Marsh Fritillary in the study area. Neither were any adult Marsh Fritillary observed on the wing during the various field surveys.

Other species recorded as casual observations made during field visits are presented in **Table 5.36**.

Common Name	Scientific Name
Common Carder Bee	<i>Bombus pascuorum</i>
Green-veined White	<i>Pieris napi</i>
Large Red-tailed Bumblebee	<i>Bombus (Melanobombus) lapidarius</i>
Large White	<i>Pieris brassicae</i>
Meadow Brown	<i>Maniola jurtina</i>
Pale Straw Pearl	<i>Udea lutealis</i>
Peacock	<i>Aglais io</i>
Pied Hoverfly	<i>Scaeva pyrausti</i>

Common Name	Scientific Name
Red Admiral	<i>Vanessa atalanta</i>
Ringlet	<i>Aphantopus hyperantus</i>
Silver Y	<i>Autographa gamma</i>
Small Copper	<i>Lycaena phlaeas</i>
Small Tortoiseshell	<i>Aglais urticae</i>
Small White	<i>Pieris rapae</i>
White-tailed Bumblebee	<i>Bombus lucorum</i>

**Table 5.36: Other Species Recorded as Casual Observations**

## 5.4 Description of Likely Effects

### 5.4.1 Designated Sites

A constraints led design approach was taken to siting of the principal features of the project to avoid areas of high sensitivity for key habitats and species occurring or likely to occur at the project site. The potential impacts on the Natura 2000 sites and their qualifying interests are considered in detail in the NIS that accompanies the planning application.

The Source-Pathway-Receptor (SPR) model was used in evaluating the potential for effects arising from the project affecting designated sites and their conservation objectives. Construction, operational and decommissioning phase effects were assessed. The likely Zone of Influence (Zoi) for different activities and protected habitats and species ranges in temporal and spatial scale. In most cases, proximity to the project site is a major factor in determining the potential for effects. However, key considerations such as the hydrological connectivity between the project site and the designated site and the distribution and ecology of the qualifying interests are also taken into account. For illustrative purposes, a nominal distance of 15km from the project site is used when displaying the location of designated sites in the wider hinterland. As appropriate, potential impacts on designated sites at greater distances are also considered and potential pathways for such impacts are evaluated.

There are three Natura 2000 sites located within 15km of the project site. These are:-

- River Barrow & River Nore SAC (002162);
- River Nore SPA (004233); and,
- Lisbigney Bog SAC (000869).

While a number of the qualifying interests of the River Barrow & River Nore SAC (see **Table 5.8** above) are located either upstream of the site, or in areas so distantly downstream (e.g. Estuaries, Saltmarsh habitats) that there is no likelihood of impact, there are other Qis that could potentially be impacted. Apart from the works to facilitate turbine delivery at Black Bridge, the construction works will not be carried out in close proximity to the SAC (the nearest turbine is located c. 1.7km overland). No signs of Otter were recorded at the wind farm site or at any of the watercourse crossings for the grid connection route or haul route works locations. Given the limited nature of the works on Black Bridge it is unlikely that there will be any significant disturbance or displacement effects on faunal Qis as a result of the project.

It is assessed that in the absence of appropriate mitigation, significant effects could occur in relation to the River Barrow & River Nore SAC. The significant effects identified are those associated with surface water run-off and contamination of watercourses linked to the SAC.

The River Nore SPA is designated for the protection of Kingfisher [A229]. It is located c. 11.5km over-land from the project site. It is in excess of 15km downstream of the project site. Kingfishers hold linear territories along the riparian corridor of from <1km to several kilometres in length (BWPI). Surveys on Irish river systems indicate they favour rivers with availability of vertical nesting banks of 1-2m in height (Cummins *et al.* 2010). The small streams that drain the wind farm sites are unattractive for nesting Kingfishers and would represent sub-optimal foraging habitat for this largely sedentary species. Given the distances involved between the project site and the SPA, there is no likelihood of any direct impacts arising on Kingfisher. However, given that there is a hydrological link, albeit distant, there is some potential, in the absence of adequate mitigation for impact upon the habitat and prey abundance within the SPA.

Lisbigney Bog SAC is located 12.4km from the project site. It is designated for the conservation of Calcareous fens with *Cladium mariscus* and species of the Caricion *davallianae* [7210] and *Vertigo moulinsiana* (Desmoulin's Whorl Snail) [1016]. This site is located upstream of the project site and there is no potential for direct or indirect effects on this site arising from the project.

Full details of the assessment undertaken are provided in the NIS.

There are also a number of nationally designated sites (NHA and pNHA) in the wider area. There are 17 no. pNHAs and 1 no. NHA located within 15km of the project site (**Figure 5.11**).

The closest of these sites is Mothel church, Coolcullen pNHA (000408) located 1.6km from the project site and 1.9km from the nearest turbine location. Mothel Church is home to a nursery colony of Natterer's bats (*Myotis nattereri*) which use the loft and bell tower of the church. While Natterer's Bat was recorded widely at the site it made up a small proportion of the registered bat calls (<4.5%) and the habitats present at the wind farm site are considered suitable, but sub-optimal, for foraging Natterer's Bat. Monitoring at height, during the summer period did not record any calls of the species near the met mast location.

Coan Bogs NHA (002382) and Whitehall Quarries pNHA (000855) are the only other nationally designated sites located within 5km of the project site. Neither are designated for faunal interests and no pathway for likely significant effects upon these sites was identified. None of the other more distant sites that do not share a European designation (e.g. River Nore/Abbeyleix Woods Complex pNHA) will be affected by the project.

### Construction Phase

As the project is not located within any designated site for nature conservation, direct effects will not occur. Indirect effects during the construction phase relate to the risk of a deterioration in water quality which could adversely affect the breeding or foraging activities of qualifying interests of SPA, SACs and features of interest of NHAs, and pNHAs; while disturbance/displacement effects could also arise due to construction activities.

### *Surface Water Runoff*

General enabling and construction works are likely to mobilise sediment and other contaminants through run-off. Tree felling, excavations, creation of new access tracks and upgrade of existing tracks, construction of turbine hardstanding areas, stream crossings and all other new hard surfaces are likely to contribute to the increase in runoff.

Likely sources of sediment laden water include:-

- Standing water in excavations could contain an increased concentration of suspended solids as a result of the disturbance of the underlying soils;
- Access tracks passing close to watercourses could allow the migration of silt laden runoff into watercourses;
- Silt carried on the wheels of vehicles leaving the project site could be carried onto the public road;
- A blockage in the drainage infrastructure could allow a breakout of silt laden runoff to reach adjacent watercourses or streams;
- Runoff from borrow pits or spoil deposition areas could be silt laden, with the risk of draining into receiving watercourses;
- Overland flow entering excavations could increase the quantity of surface water to be treated for sediment removal;
- Tree felling and vegetation clearance could lead to an increase in sediment and nutrients in the surface water runoff, particularly if the brash is left in place in the riparian buffer zones;
- Inappropriate management of excavations could lead to loss of suspended solids to surface waters;
- Inappropriate management of the excavated material could lead to loss of suspended solids to surface waters;
- Surface water inflows and minor groundwater seepages may occur in turbine base excavations. Pumped water from the excavations will most likely contain suspended solids; and,
- During watercourse crossings and enabling works near watercourses there is a potential to release suspended solids into the watercourse. Works leading to erosion of the riverbanks/bed could result in the release of suspended solids.

### *Release of hydrocarbons*

- Refuelling activities could result in fuel spillages which could pollute ground and surface water;
- Fuel spill/leaks from storage tanks within the temporary construction compound for plant machinery. Fuel spills/ leaks could result in a deterioration of downstream water quality; and,
- Tree felling process require trafficking of heavy machinery which can lead to pollution of watercourses due to spillage of fuels and hydrocarbons.

### *Release of Cement-Based Products*

Cement-based products should uncontrolled discharges or inappropriate management of cementitious materials occur, could lead to contamination of receiving surface waters and groundwaters.

### *Spread of Invasive Non-native Species*

While no Third Schedule non-native species were recorded within the project site, it is possible that such species could be present by the time construction works commence, or that machinery and imported material could act as a vector for introducing or dispersing non-native invasive species within the proposed project working areas (including intersecting watercourses) and to adjacent lands/watercourses.

### *Disturbance/Displacement*

The project site is not located proximate to any SPA where any direct effects upon avian species are assessed as likely to occur. The likelihood of ex-situ effects occurring on such species is also unlikely based on the nature and scale of the project, the habitats present and the bird assemblage recorded using the site across a number of years.

No signs of Otters were recorded at the watercourse crossings, including at Black Bridge. It is possible however, that in the absence of mitigation that some disturbance and displacement of faunal qualifying interests (particularly Otter) could occur as a result of the construction activity.

### *Habitat Loss*

There will be no direct habitat loss of any habitat associated with the designated Natura 2000 sites in the wider receiving environment.

### *Operational Phase*

As the project site is not located within designated nature conservation site, no direct effects will occur. Once operational, no significant change would be anticipated in relation to the volume or quality of run-off from the site.

The grid connection route will be undergrounded and therefore there will be no risk of operational phase impacts arising in relation to the cable connection.

Indirect effects such as those related to collision risk to qualifying interests and features of interest to European and nationally designated sites are assessed below.

### *Collision Risk*

During the operational phase, there is the potential for collision of birds and bats with turbine towers, blades (moving or stationary) and/or associated infrastructure; and that the wind turbines could act as a barrier to dispersal and movement of birds and bats.

The project site is not located close to any European nature conservation site designated for bird or bat qualifying interests. Mothel Church, Coolcullen pNHA (designated for a maternity Natterer's Bat colony) is located 1.9km from the nearest turbine and, therefore, theoretically within the zone of influence for bats dispersing to feed from this roost site. However, as described above, there was little evidence of the wind farm site being an important foraging area or on a regular commuting route for Natterer's Bats.

The likelihood of collision mortality with such species is assessed elsewhere within this chapter and within the NIS as relevant. It is assessed that collision mortality will not affect the conservation objectives of Natura 2000 sites within the Zone of Influence. Similarly, based on the detailed survey data, there is no reason to indicate that the

project will adversely affect the Natterer's Bat population through collision mortality at the operational stage.

### Decommissioning Phase

Risks associated with the decommissioning phase are likely to be similar in nature, although less pronounced, both spatially and temporally, than those associated with the construction phase. Therefore, the risks to designated sites and their features of interest or qualifying interests are chiefly related to effects on water quality from run off of sediment and other pollutants and also to increased disturbance associated with the movement of plant and personnel. These activities may also increase the risk of the spread of Invasive Plant species.

### Summary

The NIS assesses the potential effects of all of the phases of the project on the designated European sites and their conservation objectives. There is a lack of credible pathway to mediate impacts upon many of the nationally and European designated sites in the wider hinterland of the project. However, there are a number of sites in the receiving environment, most notably those hydrologically linked with the application site, that could potentially be impacted by the project.

The construction phase is identified as requiring the greatest degree of active environmental control. However, commensurate measures for control of run-off during the operational and decommissioning phases of the project will need to be applied to ensure that the identified risks are adequately addressed. In the absence of appropriate mitigation, there is a likelihood of significant adverse effects on designated sites, including the River Barrow and River Nore SAC in the short-term, associated with the construction phase.

## 5.4.2 Habitats

### 5.4.2.1 Construction Phase

No Annex I habitats listed under the EU Habitats Directive are present within the study area (including the haul route works locations). Also, no botanical species protected under the Flora (Protection) Order 2022, listed in the EU Habitats Directive, or listed as flora of conservation concern in Ireland were recorded within the study area. The main habitats which will be directly impacted by the proposed development works footprint include improved agricultural grassland (GA1) and Conifer plantation (WD4) which are of Local importance (Lower value). Other habitats which will be directly impacted include Hedgerows (WL1), Treelines (WL2) Wet grassland (GS4), Dry meadows and grassy verges (GS2) and Scrub (which are considered to be of Local importance (Higher value) and Exposed rock Local importance (Lower value).

Approximately 0.5km of existing agricultural tracks (*i.e.* Spoil and bare ground (ED2)), Local importance (Lower value), will be upgraded to accommodate the proposed development site access.

Eroding upland river (FW1) habitat and flora associated with aquatic habitats in the study area and downstream could be adversely affected by the project through indirect hydrological/water quality effects such as nutrient release, siltation and/or contaminated run-off arising from the development works footprint. These watercourses are connected to the River Dinin which forms part of the EU Designated sites, the River Barrow & River Nore SAC and the River Nore SPA. The River Barrow & River Nore SAC is located immediately downstream of Black Bridge on the Dinin

(South) although it is 1.7km from the nearest turbine (over land). The River Nore SPA is 13km from the nearest turbine (over land) but in excess of 26km downstream when measured along the river network.

Other habitats present such as Recently felled woodland (WS5), Immature Woodland (WS2), Stonewalls and other stonework (BL1) of Local importance (Lower to Higher Value) are outside the project footprint and as such will be maintained as is and not directly affected.

The wind farm site extends to an area of c. 290ha; however the direct footprint (i.e. loss of habitat) of the wind farm infrastructure is small in comparison. The actual permanent land take is limited to the area of the turbine bases, crane hardstandings, the new and existing access tracks, the meteorological mast base and the electricity substation, which collectively account for circa 9ha). This is c. 3% of the total area of the wind farm site. Furthermore, the wind farm will be largely confined to the existing improved agricultural grassland (GA1) and Conifer plantation (WD4) and existing access tracks (i.e. buildings and artificial surfaces (BL3)) of Local importance (Lower value). The permanent loss of sections of such habitats, which are of Local importance (Lower value), will lead to a neutral-imperceptible impact on existing semi-natural habitats and flora species at the site and surrounding locality. It is also noted that the forestry plantation cleared to facilitate the wind farm development will be replaced elsewhere.

Small areas of relatively high quality and diverse wet grassland (GS4) will be permanently removed at the location of turbines T1 and T3 and their associated infrastructure. The wet grassland is a semi-natural habitat that is of Local Importance (Higher value). This represents a significant negative impact in the local context on this semi-natural grassland habitat type which is becoming increasingly scarce in the surrounding intensively managed landscape. The wet grassland surrounding the infrastructure at these locations (i.e. outside of the project footprint) may be damaged by inappropriate trafficking during the construction phase. Furthermore, the installation of drainage associated with the is also likely to alter the hydrology of the Wet Grassland habitat. This could result in the drying out of the area leading to a permanent habitat modification and could in the absence of mitigation be a significant negative effect at the immediate local scale in the absence of mitigation. Such an effect is likely to be localised to the area immediately drained by such infrastructure and would not affect other areas of similar habitat.

Sections of hedgerow (WL1) and treeline (WL2) habitat will also be permanently removed to accommodate the construction of wind farm infrastructure. No Annex I habitats or rare or protected plant species were present in these areas. The removal of these sections of hedgerow (WL1) and treeline (WL2) is assessed as likely to have a significant local negative impact on this habitat as it is a permanent loss of a habitat type that is of Local Importance (higher value). However, the extent of vegetation removal has, by design, been minimised and no vegetation will be unnecessarily removed. As part of the reinstatement process; all trees felled and hedgerow removed in the construction of wind farm infrastructure will be replaced elsewhere within the project site, particularly along arterial access tracks.

In the absence of any mitigation to protect existing trees during the construction phase, it is likely that trees in hedgerows and treelines may be damaged by construction activity. This could arise from damage to roots of trees if they remain unprotected and are within the works areas. Additionally, there is a likelihood of

machinery strike damaging tree limbs. In a worst-case scenario, the damage inflicted on the trees, hedgerows and treeline habitats would result in their degradation and removal from the lands. The effect of this would be permanent and are likely to be significant negative at the highly localised scale in the absence of appropriate mitigation.

Eroding/upland streams (FW1) and an extensive network of forestry and agricultural drainage ditches (FW4) have been installed across the study area and form a hydrological link between the study area and aquatic habitats in the wider locality including the EU designated site the River Barrow and River Nore SAC. There is, therefore, a pathway for adverse indirect hydrological/water quality effects such as nutrient release, siltation and/or contaminated run-off arising from the project site. This is assessed as likely to result in a moderate, negative and short-term effect in the local context.

Overall, effects on habitats and flora are assessed as likely to be significant negative short term at a local to European level.

#### 5.4.2.2 Operational Phase

The likely operational phase effects are largely related to the turbine activity and to a lesser extent to the maintenance of the site infrastructure. Following the completion of the construction phase and the recolonisation of disturbed ground, there will be no additional removal of habitat during the operational phase. As a result, there is no likelihood of direct adverse effects on habitat and flora arising from the operational phase of the development.

While site traffic will be greatly reduced during the operational phase in comparison to the construction phase, habitat damage may occur from inappropriate trafficking for maintenance works during the operational phase. This is particularly so in areas of sensitive wet grassland in proximity to turbines T1 and T3; and effects are assessed as slight negative in the local context.

Maintenance activities may also give rise to discharges of silt, hydrocarbons and other chemicals into watercourses. In the absence of appropriate controls, there is a risk of leakages of oils, fuels and other hydrocarbons from plant & machinery, turbine transformers and the electricity substation. However, it should be noted that during the operational phase, only small quantities of hydrocarbons will be present. Notwithstanding this, there remains a slight negative risk of adverse effects on terrestrial and aquatic habitats, and flora.

As outlined in previous sections, the project will result in the replacement of the vegetated surface with less permeable surfaces within the wind farm (e.g. hardstands, access tracks etc.) which may result in an increase in the proportion and velocity of surface water run-off reaching the surface water drainage network and receiving watercourses. During storm rainfall events, additional run-off coupled with increased velocity of flow could increase hydraulic loading, resulting in erosion of watercourses. This could lead to adverse effects on aquatic habitats and flora, most notably through sedimentation of instream habitats through increased erosion rates.

It is assessed that the likely operational phase effects on habitats and flora are slight-negative, short-term and in the local context, in the absence of mitigation.

#### 5.4.2.3 Decommissioning Phase

The likelihood of effects during decommissioning are similar in nature, if not in scope, to those assessed for the construction phase. All decommissioning works will be governed by the same requirements to control habitat loss and damage, run-off and pollution to watercourses as have been implemented during the construction phase.

In the absence of mitigation, the likely effects of the decommissioning phase on habitats and flora are assessed to be slight negative short term at a local level. The nature of the decommissioning works is unlikely to result in any significant effects on rare or protected habitats or botanical species in the wider area. In the absence of appropriate mitigation, invasive plant species may be spread during the decommissioning works.

#### 5.4.2.4 Non-native Invasive Species

Construction works within the project site may disturb stands of invasive plants and/or soils contaminated with invasive plant material and cause them to spread onsite. In addition to lands within the project site, there is an identified risk of invasive plant species being spread onto neighbouring lands and onto public roads and other locations. Construction works could, therefore, result in the spread of invasive plant species both *in-situ* and *ex-situ*. The most common means by which these species can be spread are:-

- Site and vegetation clearance, mowing, hedge-cutting or other landscaping activities;
- Spread of seeds or plant fragments during the movement or transport of soil;
- Spread of seeds or plant fragments through the local surface water and drainage network;
- Contamination of vehicles or equipment with seeds or plant fragments which are then transported to other areas; and,
- Importation of soil from off-site sources contaminated with invasive species plant material.

A watercourse can act as a pathway allowing the transit of invasive species resulting in the indirect habitat loss/damage to downstream habitats in the wider area including designated nature conservation sites that are present e.g. River Barrow & River Nore SAC. Run-off from traffic, deposition of spoil from the wheels of vehicles or accidental spillage of soil from the trailers may result in the inadvertent spread of invasive plant species to nearby aquatic habitats downstream.

Machinery, equipment and material (including soil) which may be transported onto the site for construction may also lead to the introduction of further invasive species to the site with potential to displace local natural biodiversity. Given the location of the project site with hydrological connections to an EU designated site(s), the effect of the spread of non-native invasive plant species could lead to a significant negative effect at the local to European level.

#### 5.4.2.5 Grid Connection

It is assessed that adverse effects on habitats & flora arising from the installation of grid connection infrastructure could only arise during the construction phase; however, it should be noted that the grid connection will be predominately placed within the carriageway of public roads; with only short section of infrastructure placed off-road which are assessed to be of low ecological value. No Annex I habitats, rare,

protected, or Third Schedule Invasive species were recorded along the grid connection route. The effects of the grid connection on habitats are assessed to be likely, non-significant neutral, localised in extent and temporary in nature.

#### 5.4.2.6 Replant Lands

The replant lands are not located within or adjacent to any designated conservation site and is not located within any particularly sensitive habitats. The site is currently in use as improved agricultural grassland (GA1), a habitat of generally low ecological importance. The afforestation of the site will see the loss of GA1 habitat of low local value, which is a habitat that is abundant locally and nationally.

The replanting and ongoing management of lands (e.g. thinning, spraying, felling) may also result in adverse effects on watercourses and aquatic habitats due to the completion of ground works and the risk of accidental release of silt, sediment or other pollutants. However, in this case, the areas to be planted are not within the immediate vicinity of any notable water features; although the lands are drained by artificial ditches within field boundaries. It is likely that in the absence of appropriate mitigation that there will be non-significant negative and highly localised short-term effects on habitats associated with the planting and early establishment phase. As the forestry matures, the effect on the local habitat are likely to be neutral non-significant and highly localised in the medium to long-term.

### 5.4.3 Birds

#### 5.4.3.1 Construction Phase

There are a number of likely construction phase effects of wind farms on birds, including habitat loss or degradation and disturbance. The likely significance of each of these effects at the project site and associated elements (e.g. grid connection route, replant lands and haul route works locations) is discussed below. An overall assessment of the likely effect of the project, as a whole, on the local avian community is also presented. The study area is not situated proximate to any Special Protection Area. The closest SPA is the River Nore SPA situated 11.4km overland from the application boundary (13km from the nearest turbine). This site is designated for the conservation of a single species, Kingfisher. Likely effects on the conservation objectives of this SPA are assessed in detail in the NIS. There is no likelihood of direct effects on the SPA but, in the absence of adequate mitigation, there is a likelihood of effects on water quality and prey availability of Kingfisher associated with run-off of contaminants to connected watercourses. Even in the 'worst case scenario' (without mitigation), such effects are likely to be significant negative but temporary in nature. Measures to avoid adverse effects on sensitive aquatic habitats and species will also be effective in minimising the risk to the SPA. Given the large distances involved and the dilution and dispersal effects that this will imbue, the actual risks of significant effects on Kingfishers in the River Nore SPA are limited. However, a precautionary approach has been adopted and likely effects on the SPA are fully assessed in the NIS.

The bird community recorded by the multi-seasonal surveys at this site reflects the nature of the dominant habitats present. The mix of agricultural grassland and conifer plantation present is represented by the dominance of typical farmland and woodland birds recorded at the site. Species diversity was relatively consistent between winter and breeding seasons, although there was significant interannual variation in the occurrence and pattern of usage of the site by key target species. The

breeding seasons flightlines were dominated by Buzzard and there were a number of breeding pairs present in this area. Adult and juvenile Buzzards were frequently recorded on the wing during the summer months and at least 1 no. Buzzard was observed on-site for over an hour in each of the breeding season VP survey periods. Buzzard flightlines also tended to dominate the winter seasons, although to a lesser extent. Kestrels were recorded in each of the survey seasons, although the time spent on-site was far more limited than Buzzard in all of the survey seasons. In several seasons, the cumulative total of the time Kestrels were observed on-site was substantially less than 10-minutes (<6-minutes in 4 no. of the 5 no. survey seasons). In the winter of 2021/2022, Kestrels were recorded over the wind farm site for a cumulative total of 16-minutes 35-seconds. As can be visually appreciated in the corresponding flightlines (**Annex 5.3**) Kestrels were far more frequently observed in areas outside the wind farm site.

The only other raptor species regularly observed on-site across the survey period was Sparrowhawk. Similar to the observations of Kestrels in this area, the cumulative time Sparrowhawks were observed in flight over the application site was less than 10-minutes in 4 no. of the 5 no. survey seasons. In the winter of 2021/2022, Sparrowhawk was observed on-site for a cumulative total of 15-minutes 30-seconds.

There were infrequent sightings of Hen Harrier (3 no. sightings in total, seen in only winter survey seasons; on-site for less than 2-minutes across entire 5 no. seasons) and Peregrine Falcon. Peregrine Falcon was rarely observed and was recorded for a maximum of 40-seconds over the wind farm site in any survey season. There were several sightings of a probable Goshawk at the site during the winter of 2019/2020. The bird was not seen during subsequent visits and is likely to have been a vagrant. A small number of Goshawks have bred in Ireland, but sightings of vagrant birds are reasonably frequent. It is probable that occasional escapes of captive bred birds also contribute to the sightings of this species in Ireland.

The pattern of occurrence and abundance of wintering flocks of Golden Plover varied significantly interannually. In the winter of 2019/2020, relatively large flocks of up to 300 no. birds were observed from time to time (10 no. flightlines), although very occasionally occurring over the site. In all, Golden Plovers were present on site for a cumulative total of a little over 2-minutes during that winter period. In the following winter (2020/2021), sightings of Golden Plover were far more frequent (53 no. flightlines) and these sightings were highly concentrated in the early and late parts of the winter season. In total, Golden Plovers were recorded on site for a cumulative total of almost 2-hours during the winter VPs. Golden Plovers were observed outside of the wind farm site for a total of almost 8.5-hours during that winter. In strong contrast, in the final winter season there were only 5 no. observations of Golden Plover and none of these were of birds within the wind farm site. Golden Plovers were not observed foraging or at rest (i.e. on the ground) within the site.

There were occasional sightings of other waterbirds and waders during the VP surveys. These were infrequent with a few sightings of Lesser Black-backed Gull and Grey Heron in several of the survey seasons. There was a handful of other sightings of waterbirds with flightlines observed of Little Egret, Mallard and Teal in a single survey season (Winter 2021/2022).

Of key consideration in terms of this assessment are effects on the target species observed to occur at the wind farm site, particularly those species of elevated conservation importance that were observed on a regular basis; namely Golden

Plover and Kestrel. A number of other Annex I avian species have been recorded on, or in the vicinity of, the study area on a very infrequent basis during the intensive field surveys e.g. Peregrine Falcon, Little Egret and Hen Harrier. The study area is not considered to be of any particular ecological significance for these species as they do not regularly occur in this area.

### Habitat Loss or Change

The construction activity and loss of habitat around the project footprint is likely to disturb and displace birds that occur in the immediate vicinity of these works. The movement of plant and personnel during construction is likely, in the absence of mitigation to see significant, albeit highly localised, negative impacts on the overall bird community present at the wind farm site. The duration of such effects is likely to range from short-term (e.g. disturbance effects associated with site traffic) to long-term (e.g. those that result from habitat loss and are associated with the ongoing disturbance/displacement effects of the operational wind farm). The extent to which individual species are susceptible to such effects depends, to a large extent, on their individual ecology.

Direct habitat loss or change is inevitable in the development of any project, especially when the development of access tracks, turbines, crane hardstandings and other associated construction is considered. This can result in reduced feeding, nesting and roosting opportunities for birds.

Direct habitat loss due to the development of wind farms tends to be relatively small (Drewitt & Langston 2006). In this instance, the permanent land take is largely limited to the area of the turbine bases, crane hardstandings, site entrances & access tracks, and the electricity substation, with minor construction at the meteorological mast, temporary construction compound and borrow pits (to be reinstated and re-vegetated). The grid connection infrastructure cable will be undergrounded and, as it will be located within the paved carriageway of public roads, will involve relatively little habitat disturbance or permanent habitat loss. Accordingly, the grid connection infrastructure is not assessed as likely to negatively affect the bird community occurring along this route.

As described earlier, the wind farm footprint is dominated by conifer plantation (WD4) and improved agricultural grassland (GA1). The general breeding and wintering bird community present at and in the vicinity of the site, as described by the flightline and walkover surveys, is typical of the range of habitats present. A total of 59 no. bird species were recorded during dedicated breeding and winter surveys (transects and point counts) with most species common locally and nationally. 6 no. of the 59 no. species recorded are currently on the Red-list (Gilbert *et al.* 2021); namely Kestrel, Meadow Pipit, Grey Wagtail, Redwing, Golden Plover and Snipe.

Kestrel, Meadow Pipit and Grey Wagtail were recorded in the study area throughout the survey years. Snipe was only recorded in the area during the winter period and did not appear to breed locally. Redwing and Golden Plover were observed as winter migrants with some observations of Golden Plover persisting into April during the pre-migration staging period.

Of these, Kestrel was not confirmed to be breeding within the wind farm site and was seen for little time on-site during the breeding seasons. In the latest iteration of the BoCI, Kestrel jumped from Green-listed to Red-listed having shown significant declines in breeding population in Ireland in recent years. The species is believed to have been

impacted by changes in land use and in farming practices which may have affected their prey availability, while it is possible that secondary poisoning has taken its toll.

The habitat loss/change associated with the project is assessed as likely to have little impact on the occurrence of Kestrel in this area. There will be a relatively small loss of foraging and nesting habitat for the species. Kestrels were observed in areas outside the wind farm site to a considerably greater extent than they were present on-site. The likely effects on the occurrence of the species at the wind farm site during the construction stage are, therefore, neutral imperceptible.

Meadow Pipit remains a common and widespread species in Ireland and was also Green-listed until recent iterations of the BoCCI list. It has observed declines in population believed to be associated with the 2 no. consecutive harsh winters 2009/2010 and 2010/2011. There is evidence that the population is recovering (CBS indices; Birdwatch Ireland) in the intervening years.

Meadow Pipit are often associated with upland areas and less-improved agricultural grassland. It is likely that the loss of some areas of wet grassland in the footprint of the project will see localised disturbance and displacement of Meadow Pipit. It is likely that this will result in a slight negative effect on Meadow Pipit.

Grey Wagtail is a species that nests and feeds along river corridors. It too has suffered significant declines in breeding population in recent decades. In the absence of adequate mitigation, construction related effects on water quality could affect the habitats of importance to Grey Wagtail in the local area. Such effects would be likely to have a significant but highly localised negative impact on the species in the short-term.

Redwing is a winter visitor and does not breed in Ireland. While relatively common in Ireland over the winter months, the species has shown a global decline in population in recent decades. It forms flocks that are highly mobile and feed on a wide range invertebrate, fruits and berries. It is likely that the habitat loss/change associated with construction will have a localised non-significant negative effect on the occurrence of the species within the wind farm site.

Snipe were not frequently observed at the site. The extent of suitable habitat for the species present within the wind farm footprint is relatively limited. Small areas of wet-grassland which will be lost at the site are attractive for the species. However, there was little evidence from either the VP surveys or from the intensive walkover studies (transects and point counts) that there was any regular usage of the site by more than a small number of individuals. The species did not breed in the area. The habitat loss/change is assessed as likely to have a neutral imperceptible effect on Snipe in this area.

Golden Plover were regularly recorded in the study area although, as already highlighted, there was a significant amount of observed interannual variation in the numbers of birds and their pattern of occurrence in this area. Golden Plover, when present, were observed from early winter up until April (when they are considered likely to be commuting between wintering and breeding areas). The study area is not within the known breeding range of Golden Plover, where the breeding population is largely restricted to northwest Ireland (and where significant population decline and range contraction has occurred, Balmer *et al.* 2013). In winter, a large influx of Golden Plover of the *altifrons* race (a separate population to the Irish breeding birds) arrive from breeding sites in Iceland (Wernham *et al.* 2002) and recent evidence confirms

that the wintering numbers of Golden Plover in Ireland, which are in excess of 150,000, are relatively stable (Balmer *et al.* 2013, Boland & Crowe, 2012).

Golden Plover was the most commonly recorded wading bird during the winter VP studies. The number of flightlines ranged from 5 no. (in winter 2021/2022) to 53 no. (in winter 2020/2021) and flock size ranged from single individuals to c. 400 birds. The flocks were highly mobile and observed over a wide area, recorded for considerably longer on areas outside of the wind farm site than within. The species did not appear to rest, or forage within the site. There is no indication that any of the habitats present within the wind farm site are of importance to the locally observed Golden Plover. The species is flocking during the winter months and is observed widely across inland counties. Wintering Golden Plovers are attracted to winter cereals, stubbles, fallow grassland and to closed-grazed pastures (EU 2009). It should be noted that, in this case, likely effects relate to the large and stable wintering Golden Plover population and not to the declining and range-contracting Irish breeding population. It is likely that, based on the evidence from the field studies in this area, that the loss and change of habitat at the wind farm during the construction phase will have neutral imperceptible to slight negative effect; and not significant; on the usage of the site by wintering Golden Plover.

Other high conservation value species recorded in the area, such as Peregrine Falcon and Hen Harrier were so infrequently observed over the wind farm site that the likely effect of habitat loss and change at the wind farm site will be neutral imperceptible.

Buzzard and, to a lesser extent, Sparrowhawk were regularly recorded in the area. Both of these raptor species are currently Green-listed. The loss/change of habitats on site associated with the construction of the wind farm is assessed as likely to result in a marginal local decrease in potential nesting and foraging habitats; however, effects on the species are assessed as likely to be local slight neutral in the short term.

General bird surveys have established that the study area is used by a diversity of breeding and wintering species typical of the range of habitats present in the study area (i.e. conifer plantation and agricultural grassland). It is not assessed as likely that there will be any significant reduction of breeding species diversity within the project site as a result of vegetation clearance and construction activities to facilitate the construction of the project. The introduction of open spaces or 'edge-effect' into a previously closed forestry canopy can, in fact, increase the abundance of some species and could benefit the overall species diversity of the plantation (Fuller 2003).

### Disturbance/Displacement

Wind farms can cause disturbance to the bird community through displacement due to construction activities, increased human presence and noise. Studies on bird displacement due to disturbance have yielded somewhat inconsistent and inconclusive results (Langston & Pullan 2004, Drewitt & Langston 2006, Kingsley & Whittam 2005). These studies have indicated that the scale of disturbance varies greatly between and within species (*loc cit.*, Langston & Pullan, 2003). Disturbance effects can result in reduced numbers of birds within a particular distance from a source of disturbance.

As described above, a range of raptors, waterbirds and waders were recorded in the study area. In addition, a diversity of passerine species typical of the dominant habitats present were recorded. The wind farm is dominated by managed habitats and lacks the upland features typical of many Irish onshore wind farms. In terms of the

key target species under consideration here (i.e. principally raptors, waterbirds and waders), few were observed with any regularity spending prolonged periods within the wind farm site. Buzzard was the target species that was recorded most frequently on-site over most of the survey seasons. Several pairs of Buzzards were believed to have bred locally and adults and young were observed within the study area. However, Buzzards were observed far more frequently and for much longer cumulative durations in areas outside of the wind farm site. Buzzard abundance and distribution has increased dramatically in Ireland in recent decades. The species has rapidly increased its breeding range in Ireland and is now one of the most common raptors in the country. Buzzards typically nest in the canopy of trees and, in the absence of mitigation, disturbance and displacement of breeding pairs may occur during the construction phase, either as a result of the loss of nesting habitat or by direct displacement. Similar displacement could occur for species including Sparrowhawk, which is suspected to have bred locally. Kestrels, were infrequently recorded in the study area during the summer months and no breeding was recorded in the area. There is some suitable habitat present and, therefore, there could be some displacement/disturbance of nesting Kestrel and Sparrowhawk during the construction phase.

Waterbirds and waders observed in the study area included occasional sightings of Grey Heron and gull species. The Grey Heron flights were associated with birds commuting between foraging sites on watercourses. No breeding evidence was recorded within the wind farm site. Gulls were occasionally recorded and these were largely observations of birds commuting across the site. A small number of records of Snipe were recorded, including some birds that were likely on passage migration. Similarly, there were a handful of sightings of additional species such as Little Egret, Mallard and Teal, all recorded in the final winter VP season. The pattern of occurrence of these species and their usage of the site does not indicate any strong association with the site. It is likely, given the pattern of these observations, that there would be a neutral imperceptible effect on these species as a result of construction phase disturbance.

Golden Plovers were frequently observed in the study area, albeit the pattern of occurrence varied greatly from winter to winter. The lands within the wind farm did not appear to be used to any extent by foraging or roosting birds. The observations tended to be of large and mobile flocks that spend prolonged periods of time in flight, across large areas, occasionally overflying the site. The birds spent relatively little of the observed time on-site and in winter 2021/2022 were not observed on-site at all during the course of the VP surveys. The general construction activity may result in some disturbance/displacement effects on this wintering/migrating species. However, if birds are displaced from the wind farm site, there is a significant amount of similar open habitat in the immediate environs of the wind farm site and these highly-mobile flocks are likely to utilise these lands instead. Given the presence of suitable alternative habitat in the wider area, the construction phase is assessed as likely to have a temporary slight negative effect.

Birds associated with the plantation habitat will be the most affected group as this is the nesting habitat which will be subject to the greatest local loss. However, any areas within or close to construction activity may see some disturbance and displacement effects on the local bird community. Displacement and disturbance will have a lesser effect on the local bird population if alternative habitats with sufficient carrying capacity are widely available in the surrounding landscape (Kingsley & Whittam

2005). There is a significant amount of similar conifer plantation and open agricultural habitats in the hinterland of the project and this will avoid displacement beyond the immediate environs of the site. In the absence of appropriate mitigation, the removal of vegetation could affect nesting and roosting birds and habitats of importance for the general bird community at the site. It is likely that the loss of habitat and construction related disturbance will have a slight negative and highly localised impact on general bird populations at the wind farm site.

The grid connection infrastructure will be undergrounded predominately within public roads. The grid connection route does not pass through any areas identified as being of ecological importance for the Annex I species under consideration. Given the short duration of the installation works, the location of the works areas within already-disturbed environments (i.e. public roads) and the absence of any important bird habitats directly along the route, the installation of the grid connection is expected to have a negligible disturbance impact on avifauna.

In the absence of appropriate mitigation, the works to facilitate access along the turbine component haul route could disturb and displace nesting and roosting birds. Such impacts are assessed as likely to be minor, temporary and localised in nature.

#### 5.4.3.2 Operational Phase

Operational phase impacts on birds can be related to disturbance, displacement or collision effects.

##### Disturbance/Displacement

Wind farms can cause disturbance to the bird community through displacement related to increased human presence (e.g. post construction maintenance), turbine presence and turbine noise. As mentioned previously, the literature on bird displacement due to wind farm disturbance has provided somewhat inconsistent and inconclusive results (Langston & Pullan 2003 & 2004, Drewitt & Langston 2006, Kingsley & Whittam 2005). These studies have indicated that the scale of disturbance varies greatly between and within species (*loc. cit.*). Disturbance effects depend on a range of issues including seasonal bird use, diurnal bird use, location, availability of alternative habitats, bird life cycle, flock size, habituation and turbine and wind farm specifications (*loc. cit.*).

Wind farms can also cause displacement of birds by creating a barrier effect to migration or local flight paths, which could result in disruption of ecological links between feeding, breeding and roosting areas (e.g. Drewitt & Langston 2006, Kingsley & Whittam 2005). In Ireland, this issue is more likely to occur with migrating wildfowl populations (Percival, 2003); however, no such species were recorded at the study area during the 5 no. seasons of VP surveys.

Published research on disturbance and displacement effects of wind farms on birds (e.g. Pearce-Higgins *et al.* 2012) has reported significant declines in the population densities of certain species at wind farm sites from pre- to post-construction and there are indications from other research that the presence of turbines may result in lower nest success for certain species (e.g. Hen Harrier). However, this effect was only evident for nest sites located within 1 km of wind turbines (Fernández-Bellon *et al.* 2015).

In terms of the key target species under consideration here (i.e. Golden Plover, Peregrine Falcon, Hen Harrier and Kestrel), no nest sites or breeding activity was recorded at the study area during the 5 no. seasons of VP surveys and walkover

transects and point counts. A number of green-listed raptor species, notably Buzzard and Sparrowhawk, are believed to have bred within the wind farm site and wider study area. Both species are regularly recorded at operational wind farms in Ireland (G. Fennessy pers obs.) with the availability of suitable foraging and nesting resources likely to dictate the ongoing presence of these species. While some highly localised disturbance/displacement effects around operational turbines may occur, it is assessed as unlikely that there would be a significant change in the pattern of usage of the subject site by such species during the operational phase.

Recorded activity levels of all target species (apart from Golden Plover which will be discussed below) were also generally low in the study area in both the breeding and winter seasons, with no regular flight paths or areas of high importance identified within the study area. The main habitats affected by the project will be conifer plantation and agricultural grassland, which are not of particular ecological value for these target species. While a number of sections of open wet grassland habitat will be impacted, the extent of habitat loss in these areas is relatively small and are not located along any regular flight paths or areas of preferential use by the target species under consideration here.

Likely operational phase disturbance/displacement effects on Hen Harrier and Peregrine Falcon as a consequence of the project are assessed to be neutral and non-significant.

Golden Plovers were recorded in the study area each winter. On the basis of the surveys undertaken, it is assessed that they did not feed or roost within the wind farm site. The presence of wind turbines may result in disturbance/displacement effects on this wintering/migrating species. As described previously, the wintering population which occurs at the study area is large and stable as compared to the breeding population, which is declining and is restricted in range to northwest Ireland. The species is regularly recorded at and in the vicinity of operational wind farms elsewhere in Ireland during the winter months (G. Fennessy pers obs.).

Indeed, while there is some evidence that Golden Plover can initially be displaced from the area immediately around an active turbine (Pearce Higgins *et al.* 2009), a subsequent study by the same author has reported that, following the construction period, populations may become habituated to operational wind farms (Pearce Higgins *et al.* 2012). Post construction monitoring at 15 no. upland windfarms showed no significant decline in Golden Plover numbers (Pearce Higgins *et al.* 2012). Similarly, there was no decline in Golden Plover populations recorded during 3-years of post-construction surveys at one UK windfarm site (Douglas *et al.* 2011). It is assessed as likely that Golden Plover will continue to occur in this area during the operational phase of the project; and that no significant disturbance/displacement effects on the Golden Plover population are likely to occur. Likely operational phase disturbance/displacement effects on Golden Plover are, therefore, assessed to be slight negative in the short to longer-term.

All other bird species recorded at the wind farm are not regarded as being particularly sensitive to disturbance/displacement and/or barrier to movement arising from wind farm development (Langston & Pullan 2003 & 2004, Percival, 2003 and Stewart *et al.* 2004). The extensive bird surveys did not record evidence of significant movements of birds across the wind farm site that would be susceptible to barrier effects.

### Collision

Bird mortality or injury at wind farms can occur through collision with rotors, towers, nacelles, cables, power lines and meteorological masts (Drewitt & Langston, 2006, Kingsley & Whittam, 2005). While most wind farm collision studies indicate low levels of bird mortality per turbine, these levels may be significant for some bird species populations such as those with a low annual productivity, slow maturity and in cases of very large wind farms with large numbers of turbines (Langston & Pullan 2003, Drewitt & Langston, 2006). This scenario has occurred on a number of inappropriately located wind farms such as those at Altamount Pass in California and Tarifa in Spain (*loc cit.*, Percival, 2003). It should be noted that the Altamount Pass wind turbines were only of c. 30m in height and the rotor envelope is therefore not comparable to the current wind farm layout. In contrast the subject wind turbines will have a blade tip height of 185m, a hub height of 104m and a rotor diameter 162m.

Collisions with wind turbines are most likely to occur where birds fly regularly at turbine blade height and do not demonstrate an effective avoidance response. Certain species, it has been postulated, show less effective avoidance of turbines and are at an increased collision risk as a result. In general, large/heavy species such as swans/geese are more susceptible to collision mortality as they are less manoeuvrable than raptors such as Hen Harrier. No flightlines of protected wildfowl species such as Whooper Swan or Greenland White-fronted Goose were recorded in the study area during the VP surveys and there is no evidence that the site is located on regular commuting or migration route for any such bird species.

In reality, the scientific evidence on collision mortality of birds with wind turbines is scant. Real-world studies on bird avoidance behaviour and the predictive ability of standard collision risk models is highly questionable (Madsen & Cook 2016). However, there is no doubt that collision mortalities occur at wind farms and that these generally occur when birds are struck by a blade. For this to occur at the project site, the birds would need to be flying at elevations of 23-185m above ground level.

The overflying rate of the project site by most target bird species, (with Golden Plover being the exception), was found to be consistently low throughout the 5 no. season survey period. The likely collision risk for such target species (e.g. Hen Harrier, Peregrine Falcon) at the wind farm is therefore extremely low. The likely effects on such species as a result of collision, across the operational lifetime of the project, is slight neutral.

Kestrel, due to its hunting behaviour (hovering) is believed to be at an increased risk of collision when compared with some other raptor species. Kestrel was observed in flight at rotor swept height within the project site for an average cumulative total of an of less than 4-minutes 20-seconds across the 5 no. survey seasons. This represents a very small proportion of the observation period (typically 36-hours observation period per season). Due to the infrequent occurrence on site, particularly at rotor swept height and the lack of evidence of locally breeding birds, the likelihood of collision mortality is assessed to be slight to moderate negative.

Golden Plover activity was found to be highly variable from winter to winter. In the winter of 2020/2021 Golden Plovers were observed on site at rotor swept height for c. 1-hour 47-minutes. However, there were no Golden Plovers recorded on site whatsoever in the following winter period. Flight heights were typically <100m, although ranged as high as 200m on occasion and as such a large proportion of flightlines took place within the rotor swept height. However, Golden Plover are highly mobile and are considered to have an avoidance rate of 98% (SNH 2018), making them less susceptible to turbine collision. This supposition is supported by post

construction monitoring at 15 no. upland wind farms (Pearce Higgins *et al.* 2012) and also during 3-years of post-construction surveys at 1 no. UK wind farm site (Douglas *et al.* 2011) where no decline in Golden Plover populations were recorded. It should also be noted that much of the Golden Plover activity recorded during the VP surveys of the study area occurred outside of the wind farm site and as such these flightlines would not be at risk of collision with turbines. Pearce Higgins *et al.* (2012) produced a detailed analysis of the observed effects at wind farm and control sites to examine any significant impacts on the abundance of key bird species using these sites. They found little evidence for differences in population trends between operational wind farms and reference sites which, they state, implies that any increase in mortality through collision with operating turbines, or other changes associated with wind farm operation, has little effect on local populations. In the same paper, they also state that there is little evidence for consistent post-construction population declines in any species using wind farm sites. Given the regular occurrence of Golden Plover within the study area and the potential for large flocks of this species to fly within the rotor swept area (for the range of tower heights and blade lengths under consideration), there is some potential for turbine collision to occur at the wind farm site. The available research shows that Golden Plover are relatively adept at navigating around operational turbines, however, and collision fatalities are unlikely to have any measurable effect on the local wintering Golden Plover population (Pearce Higgins *et al.* 2012). The likelihood of collision effects on the local Golden Plover population as is therefore assessed to be non-significant negative and localised in the short to longer-term.

The grid connection infrastructure will be installed underground and will not pose any collision risk to avian species.

#### 5.4.3.3 Decommissioning Phase

The decommissioning phase involves dismantling and removal of infrastructure and generally will involve far less intrusive work than at construction stage. There will be some limited potential for surface water run-off which could affect bird species that feed and nest along the local watercourses. The extent and duration of the works are unlikely to cause significant disturbance or displacement effects on any avian species. In the absence of appropriate mitigation, the likely effects on avian species are assessed to be temporary, slight-negative and localised.

#### 5.4.3.4 Replant Lands

The afforestation of the lands is unlikely to significantly affect the avian species diversity in the local area. The planting and subsequent management and harvesting operations would see a marginal increase in sources of disturbance for breeding and roosting birds. On the other hand, forested areas may provide breeding, foraging and roosting habitat for a variety of bird species. Overall, the likely effect on bird populations arising from the temporary planting phase is non-significant neutral and highly localised. As the forestry matures, it is likely that there will be a localised slight positive effect on bird species diversity and abundance in the medium to long-term.

### 5.4.4 Mammals

#### 5.4.4.1 Non-volant Mammals

##### Construction Phase

The primary effect of wind farm development on non-volant mammals typically arises through the loss of habitat as a result of construction. In the case of this project, the habitat to be lost predominately comprises intensive agricultural grassland and commercial forestry, each of which are of limited ecological value.

Access tracks will occur in close proximity to 'outlier' badger setts at 2 no. locations. Outlier badger setts may be occupied sporadically or seasonally, and use of individual outlier setts varies according to location and the badger group involved. Being an outlier sett, it is unlikely to be used by badgers for breeding purposes. In the absence of precautions, direct disturbance could occur to these burrow systems with 'Sett\_B' within 10m of an access track but on the opposite side of the soil bank. There is less likelihood of significant direct effects on 'Sett\_A' given a separation distance of c. 20m to the construction footprint.

For both 'Sett\_A' and 'Sett\_B', there is a likelihood of indirect disturbance effects from noise and vibration and ongoing human presence. Such disturbance may cause disruption of normal activity or displacement of badgers locally. The badger outlier setts are assessed to be of 'Local Importance (higher value)' (following NRA, 2009).

The likelihood of site traffic leading to a risk of road casualties of Badgers and other mammals has also been assessed. The bulk of construction traffic and movement of machinery and personnel will occur during daylight hours and the site speed limits will be imposed. Therefore, there is no risk of significant fatalities of non-volant mammals on site roads.

During the construction phase of the development, disturbance of fauna occurring on/near the wind farm is likely. This disturbance will be temporary in duration. The overall level of non-volant mammal activity at the wind farm site was found to be moderate. In the event that some mammals are displaced through disturbance or direct loss of habitat, there are extensive areas of similar habitat in the vicinity of the site and affected or disturbed individuals may move into the surrounding areas. Given the relatively small footprint of the development, any displacement or disturbance that may occur is likely to be highly localised, both temporally and spatially. It is assessed that the permanent loss of agricultural grassland and commercial forestry is unlikely to adversely affect the local mammal community.

Some disturbance effects on non-volant mammal species during the construction phase are likely to occur due to the construction of the grid connection infrastructure and completion of the haul route works. No signs of mammals including Otter and Badger were recorded during surveys of bridge/culvert sites along the grid connection route and no underground dwellings were present in these areas; while no evidence of mammals was identified at the haul route works locations.

In addition, mammals associated with aquatic habitats (e.g. Otter) in the wider area could be subject to adverse effects from siltation, run-off and fuel spills. No evidence of the presence of Otter was recorded on the watercourses at the wind farm site or those crossed by access tracks and along the grid connection route. It is likely that Otters occur locally, at least on occasion, and there is a likelihood, in the absence of appropriate mitigation, for adverse effects on the species.

The likely construction phase effects on the non-volant mammal community present is assessed to be non-significant, localised, short-term to temporary, negative.

### Operational Phase

There is a very limited likelihood of operational phase effects on the local mammal community. The level of human and vehicular disturbance will not be significantly higher than that experienced currently. Mammals will use the access tracks to commute to and from feeding areas and there is some potential for increased interaction between humans and locally occurring mammals.

It is assessed that the presence of the project will not present as a barrier to the movement of Badgers, Foxes and other mammals through the site.

Any edible or putrescible wastes generated by visitors to the site (e.g. at the electricity substation) is likely to attract mammalian scavengers. Such effects are amenable to mitigation as described in the mitigation measures outlined below.

In the absence of mitigation, the likely operational phase effects on non-volant mammals are assessed to be long-term, neutral imperceptible and highly localised in nature.

### Decommissioning Phase

Similar to the construction phase, there is a likelihood of disturbance and displacement effects on mammals; however, effects are assessed to be of a reduced magnitude and significance. In the absence of mitigation, effects on mammals are assessed as likely to be non-significant negative, localised and temporary to short-term in nature.

### Replant Lands

The replant lands are dominated by habitats of low importance to breeding or resting mammals. The grassland may provide foraging habitat for species that are believed to occur locally e.g. Badger. However, there is a substantial amount of similar habitat in the surrounding area. In the short to longer-term as the woodland matures, it would provide some suitable habitat for woodland species and generalists. It is likely that the effect on non-volant mammals would be neutral imperceptible in the short to longer term.

#### 5.4.4.2 Bats

### Construction Phase

Wind energy developments present 4 no. likely risks to bats (NatureScot, 2021):-

- Collision mortality, barotrauma and other injuries;
- Loss or damage to commuting and foraging habitat;
- Loss of, or damage to, roosts; and,
- Displacement of individuals or populations.

For each of these risks, the detailed knowledge of bat distribution and activity within the study area gained during the current assessment is used to predict the likely effects of the project on bats. Several bat species were noted in the vicinity of the wind farm site and grid connection route, all of which are legally protected under the Irish Wildlife Acts (1976 as amended) and listed on the EU Habitats Directive.

Given the ecological context of the site and general lack of optimal roosting opportunities, the project site is rated as 'low value, locally important' for bats. Pasture based agriculture will continue in undeveloped areas of the site post-construction, and the effect of the loss of intensive pasture to foraging bats is likely to be

insignificant. Construction phase activities will also result in the loss of commercial forestry as well as small areas of hedgerow and treeline habitats, and the effect of this loss will be to reduce foraging and commuting habitat locally. This is likely to disturb or displace bats that forage at the site or commute through the site. While hedgerows and treelines are common features in the wider landscape, the loss of commuting habits (albeit only short lengths) will displace some bats in the immediate locality of works and marginally reduce habitat connectivity locally. It should be noted that in the context of wind farm developments, it is preferable to reduce habitat connectivity in the immediate locality of turbines to reduce the potential for collision and barotrauma to occur.

1 no. bat roost was confirmed within the wind farm site and this contained a single Soprano Pipistrelle bat on the night of survey. No works are proposed which will affect this structure. Bat activity recorded was moderate overall. While it is assessed that there is no likelihood of a significant bat roost occurring within the relevant distance of the project (per NatureScot, 2021), it is likely that individual bats or small groups of bats may roost in trees or existing structures at least occasionally and mitigation measures will be applied to minimise the effects on bats. No ideal tree roosts locations were noted and the suitability of the available trees for roosting bats is assessed to be 'negligible' or 'low'.

Construction phase lighting may attract certain bat species and displace others and floodlighting can be a significant source of disturbance for all nocturnal mammal species. However, this effect will be temporary in nature and localised to areas around the site compound. Night-time lighting will be limited in extent (both static lighting, and vehicle headlights) as standard construction works will be carried out mostly during daylight hours.

Construction related run-off or degradation of aquatic habitats through hydrological links could lead to a deterioration of the feeding resource for bats associated with aquatic habitats in the wider area. However, the design of the project has ensured that there will generally be no construction activity within 50m of watercourses, except where unavoidable.

The likely effects on bats are, therefore, assessed to be localised, temporary to short-term, and slight negative.

### Operational Phase

Habitat loss experienced during the construction phase (described above) will continue to persist through the operational phase; however, all hedgerow lost during construction will be replaced elsewhere on site. The operation of the wind farm at this site is likely to result in disturbance to commuting and foraging bats. Bat activity at the site was variable, with periods of moderate-to-high activity occurring for some species. Decreased connectivity resulting from removal of commuting features likely to be used by many bat species (e.g. hedgerows and treelines) will persist during the operational phase, but decreased connectivity to proposed turbine locations is desirable in terms of reducing risk of fatality or injury as a result of contact with rotating turbine blades. Collision risk is discussed further below.

There is little or no published evidence available on prevalence of bat fatalities at wind farms in an Irish context. Where fatalities have been monitored at wind farms in the USA, most losses have been related to periods of migration ([www.nationalwind.org](http://www.nationalwind.org)).

Both direct collision with turbine blades and barotrauma resulting from close contact with blades have been reported as an issue for bats at wind farms (e.g. Cryan *et al.*, 2009). The susceptibility of bat species likely to be at risk of effects from wind turbines is partly associated with the likelihood of different species flying at rotor blade height. In an Irish context, Leisler's Bat is considered to have a somewhat greater mortality risk at wind farms than the other species recorded on (or adjacent to) the site, as this species is a relatively large and high-flying species. Leisler's Bats typically do not follow landscape features such as treelines or woodland edges when foraging.

A general assessment of vulnerability of bat populations to collision with wind turbines, based on best available scientific information, is provided below. This adapts, for use in an Irish context, a collision risk scheme provided in NatureScot (2021). NatureScot (2021) provides a generic assessment of bat collision risk for UK species based on species behaviour and flight categorisation as well as evidence of casualty rates in the UK and Europe. This bat species collision risk assessment is considered to represent best available information for use in an Irish context.

This species collision risk categorisation is used in combination with relative abundance to indicate the likely vulnerability of bat populations. Relative abundance for Irish species was determined in accordance with a scheme for rarity of bat species provided in Wray *et al.* (2010) in combination with best available population data provided in recent Article 17 reports (NPWS, 2019). The limitations in terms of Irish bat population data is acknowledged in the latter report. The collision risk estimation scheme for Irish bat species is presented in **Table 5.37** below.

Relative Abundance	Collision-Risk		
	Low	Medium	High
Common (100,000 plus)			Common Pipistrelle Soprano Pipistrelle
Rarer (10,000 – 100,000)	Daubenton's Bat Brown Long-eared Bat Lesser Horse-shoe Bat		Leisler's Bat
Rarest (under 10,000)	Natterer's Bat Whiskered Bat		Nathusius Pipistrelle

*Population vulnerability: yellow = low, orange = medium, red = high.*

**Table 5.37: Estimation of Irish Bat species' Population Vulnerability**

In determining the project specific risk to bats, NatureScot (2019) recommends a two-stage process as follows:-

- Stage 1: Indicatively assess site risk based on consideration of habitat present and development related features (i.e. number of turbines, size of turbines and proximity to other wind farms); and,
- Stage 2: Overall assessment of risk for high collision-risk species, considering bat activity results and the relative vulnerability of species.

Initially, an assessment of the general site risk based on habitats present was carried out following the scheme presented in NatureScot (2021). Some moderate suitability bat roosts are present near the wind farm site and the site presents foraging habitat

which is well connected to good roosting and foraging habitats in the hinterland. Therefore, a habitat risk of 'Moderate' is applied.

The project is 'Medium' in scale (under 10 no. turbines although with relatively large turbines, and with one other operational wind energy developments within 10km). Based on the above initial site risk assessment, the project is considered to be 'Medium Risk' to bats and a site risk score of 3 is applicable.

The next stage of the process is applicable to 'high collision-risk' species only and utilises information on the activity level recorded on site in each monitoring period. This assessment is intended to identify projects which are of greatest concern in terms of bat collision risk. The following high collision-risk species have been recorded at the current site:-

- Leisler's Bat;
- Common Pipistrelle; and,
- Soprano Pipistrelle.

A species-specific indication of risk is provided below for each of these species (**Table 5.38**).

Overall activity level for Leisler's Bat in the context of the project is assessed to be 'moderate to high'. Leisler's Bat activity was generally highest in the summer period but a high peak of activity occurred at 'Bat\_1' in Spring 2021 (963 no. registrations).

Common Pipistrelle is a common and widespread species in Ireland and is assessed to be a high-collision risk species due to foraging ecology and flight characteristics. Common Pipistrelles were the most regularly recorded species across the site. Overall activity levels for Common Pipistrelles are assessed to be moderate'. Common Pipistrelle activity was highest in the Summer and considerably lower in Spring. Common Pipistrelle activity was highest in the Autumn period and peaks of activity occurred at the 'Bat\_1' monitoring location.

Soprano Pipistrelle is a common and widespread species in Ireland and is assessed to be a high-collision risk species due to their foraging ecology and flight characteristics. Soprano Pipistrelles were recorded during surveys across the site. Soprano Pipistrelle activity was highest in the autumn period and peaks of activity occurred at the 'Bat\_1' monitoring location.

	Species	Site Risk Level	Activity Category	Overall Assessment
Spring 2021	Leisler's Bat	3	Moderate to High (4)	12
	Common Pipistrelle	3	Low to Moderate (2)	6
	Soprano Pipistrelle	3	Low (2)	6
Summer 2021	Leisler's Bat	3	Moderate (3)	9
	Common Pipistrelle	3	Moderate (3)	9
	Soprano Pipistrelle	3	Low to Moderate (2)	6
Autumn 2021	Leisler's Bat	3	Moderate (3)	9
	Common Pipistrelle	3	Moderate (3)	9
	Soprano Pipistrelle	3	Moderate (3)	9

Overall collision risk assessment: Low (0- 4; green), medium (5 - 12; amber), high (15 - 25; red) (following SNH, 2019).

**Table 5.38: Overall Collision Risk Assessment of Bat Species**

The overall risk-assessment procedure indicates the project is of medium risk for all relevant bat species in all seasons. While activity levels of the above species varied between survey locations (corresponding to turbine locations), it is not possible to determine with certainty the different levels of collision risk presented by individual turbines. While some turbines showed higher levels of bat activity in several seasons than other turbine locations, the NatureScot (2021) methodology involves recording activity from near ground-level. The clearance of vegetation for turbulence reasons and to provide bat buffer zones around the operational turbines would also be expected to change the occurrence and pattern of activity of bat species in the immediate vicinity of the turbines. The purpose of integrating the bat buffer zones into the design of the wind farm layout is to reduce the likelihood of collision related mortality with bats.

The primary measure employed to avoid collision and barotrauma in bats relates to the design of the project to avoid, insofar as possible, features utilised by foraging/commuting bats. As recommended by SNH (2019), a 50m separation distance from habitat features used by bats and the blade tips of wind turbines must be maintained as the minimum bat feature buffer. Buffers are provided as the distance from turbine towers to the feature, with the separation distance being dependent on feature heights in relation to turbine dimensions. A buffer area was implemented which took account of the turbine dimensions and the approximate height of the vegetation that occurs in the vicinity of the turbine locations. This buffer area was calculated based on the formula presented in NatureScot (2021):-

$$\text{Buffer distance} = \sqrt{(50 + bl)^2 - (hh - fh)^2}$$

(where bl = blade length, hh = hub height, fh = feature height (all in meters))

Applying the dimensions of the proposed turbines and a feature height of 20m, yields a buffer distance of c. 100m. All forestry/hedgerows/treelines within 100m of a wind turbine will, therefore, be removed and, as appropriate, replaced on-site of elsewhere.

As per NatureScot (2021) guidance there is no requirement to complete an Overall Risk Assessment for low-risk species. The low-risk species that were recorded were Brown Long-eared Bat, Natterer's Bat, Whiskered Bat and Daubenton's Bat. Overall activity levels were generally low for the above species and by virtue of their low vulnerability to wind energy developments, no significant collision related risk is likely. No other significant impacts are likely to occur on bats during the operations phase of the proposed wind farm.

In the absence of mitigation, the overall effects on bats during the operational phase is assessed as likely to be slight negative and localised in the long-term.

In addition to the buffer zones, operational mitigation is proposed to further minimise the risk of collision fatalities and bats at this site.

### Decommissioning Phase

Similar to the construction phase, there is a low likelihood of disturbance and displacement on bats from activities associated with the decommissioning phase of

the project. However, any such effects are likely to be imperceptible negative, localised and temporary in nature.

### Grid Connection

The laying of the grid connection is unlikely to have any significant effects on bats.

### Replant Lands

The replant lands are dominated by improved agricultural grassland, a habitat of low ecological value for bats. Disturbance or removal of hedgerow or trees to facilitate planting could result in a loss of breeding/resting and foraging habitat for bats. If a roost was affected, this is assessed as likely to have moderate to significant negative local effects on bats in the short-term. However, on the basis of surveys undertaken, there is no evidence to suggest that any PRFs would be affected by the afforestation and such effects are assessed as unlikely and amenable to mitigation.

In the short to longer-term as the woodland matures, it will provide some suitable habitat for foraging and commuting bats. It is likely that the effect on bats will be neutral imperceptible in the short to longer term.

### 5.4.5 Aquatic Ecology

There are several mechanisms by which construction projects can negatively impact upon the aquatic environment. By and large, the likely effects associated with wind farm developments are related to the construction phase, with significantly lesser risks associated with the operational and eventual decommissioning phases of the project. The chief mechanisms for negative impacts to arise relate to the following occurrences.

#### Input of Silt

As well as directly affecting fish through their gills, this has the medium/long term effect of settling on the riverbed smothering coarse patches of sediment with fine particles, and depleting oxygen levels within the sediment by reducing through-flow within the sediment. It may also cause direct mortality of eggs and early life stages of various fish. The deterioration of the riverbed in this manner has a detrimental effect on the macroinvertebrate assemblage, which also has a knock-on effect on fish. The likelihood of influx to the watercourse increases dramatically with rain, particularly heavy rain. Slope, ground porosity and vegetated cover are also significant factors governing the input of sediment to a watercourse.

#### Input of Nutrients

Excessive nutrients drive up productivity within a watercourse. Excessive plant and algal growth is caused by input of the plant nutrients nitrogen and phosphorus. In the presence of excessive growth of organic matter, ambient dissolved oxygen (DO) levels fall whilst the biochemical oxygen demand (BOD) rises (a measurement of the rate of oxygen usage by aerobic organisms). The preceding sentences are a brief overview of nutrient input, however in reality it is a complex science of parameters, drivers, knock-on effects and feedback systems that combine and deplete the oxygen levels in the watercourse. This can have a significant effect on fish life, as well as many species of invertebrates, often changing the species assemblage of the ecosystem itself.

#### Input of Cement

The introduction of cement to an aquatic environment can change the chemistry of the water (particularly pH and dissolved oxygen) as well as adding suspended solids, and as such has the potential to cause significant negative impacts on the stream. The significance and duration of the chemical effect is dependent on parameters such as quantity spilled, dilution rates, speed of remediation etc. However, an individual event could lead to a significant medium-term impact. Concrete spills can cause fish kills and can be detrimental to the macroinvertebrate community. The resultant reduction in water quality and its bio-indicators is in violation of the Water Framework Directive (2000/60/EC).

#### Input of Hydrocarbons and other chemicals

Spillage of hydrocarbons and other chemicals into the aquatic environment, depending on its character and magnitude, has the potential to cause significant effects of varying extents and durations. The spill can cause biotic mortality in a number/composition of ways, through physiochemical reactions (pH, DO, COD etc) or through direct toxicity.

#### Hydromorphological Changes

Hydromorphological changes can result from direct mechanical disturbance of the river, or significant changes within the catchment. Examples of direct mechanical disturbance include re-alignment of the channel, disturbance of connectivity to the flood plain, river crossings etc. Examples of significant changes within the catchment include large scale poorly designed drainage systems, drainage of wetlands, replacement of the vegetated surface with less permeable surfaces; all of which can change the magnitude of flood events as well as the erosion-deposition regime within the main channel.

##### 5.4.5.1 Construction Phase

There are several aspects of the construction phase of the project which could, in the absence of adequate controls, affect the local aquatic ecosystem. The principal mechanisms involve the mobilisation of sediment and pollutants during the vegetation clearance, earthworks and construction of wind farm infrastructure. The sensitive aquatic ecosystems and species include fish and macroinvertebrates.

#### Clear Felling

Approximately 15ha of conifer plantation are to be removed to make way for the turbine bases, crane hardstandings, and other ancillary infrastructure. The main issues pertaining to watercourses during clear felling are potential sediment and nutrient release. Sediment can be released during vegetation clearance mainly due to a combination of the removal of canopy combined with the tracking of heavy machinery over unvegetated/exposed ground. Nutrients may also be released as a result of decomposing brush, in combination with nutrients released from changes in soil structure and stability.

Clear felling is part of the current land usage, with or without the project, in line with current timber industry practices.

#### Earthworks

There will be significant earthworks onsite during the construction of the project. Excavation, storage and movement of soil, sub-soil and rock will be carried out for the provision of the various infrastructure. It is likely, in the absence of adequate controls, that silt, hydrocarbons and other chemicals could be released to watercourses, as

well as inducing hydromorphological change in watercourses. As described at **Section 5.4.5** above, the runoff of sediment to watercourses can adversely affect the aquatic ecosystem, impacting on fish and their habitats. Salmonids are sensitive to increased sediment loading and marked increases in runoff of silt could result in changes in the distribution and abundance of macroinvertebrates and fish in areas impacted by uncontrolled silt and sediment mobilisation.

Although there currently exists some access tracks within the site which will be upgraded, the majority of the access tracks will be newly created. The passage of machinery on these gravel tracks, particularly heavy machinery, can also cause release of sediment into watercourses. There are a number of processes through which this can happen including wear and break-down of surface gravels, degradation of tracks due to a combination of weight and vibration, damage to roadside drainage, and importation of sediment on wheels and tracks. This is also likely, in the absence of adequate mitigation, to input hydrocarbons to watercourses.

In the absence of adequate environmental controls, run off during construction is likely to result in moderate to significant negative effects on aquatic ecosystems in the temporary to short-term. The extent of this effect would be dependent on the nature and volume of the mobilised silt and the watercourses to which this material discharged. In general, runoff will disperse and settle-out depending on the particle size and flow conditions in the watercourse. In this instance, given the characteristics of the watercourses present, it is likely that silt will settle out locally in areas downstream of the site, although fine sediments may disperse further along the hydrologically connected watercourses.

#### Dewatering and Pouring of Concrete

Excavations may require dewatering due to water table issues, or heavy rain. This water is usually laden with suspended solids and the suction associated with the pumping may increase the level of suspended solids further. The pouring of foundations will involve conveying and handling concrete onsite. This is brought in bulk in concrete trucks, which will typically require washing-out after they have emptied their loads. This may, in the absence of adequate controls, introduce silt and cement to aquatic environments. Cementitious run-off can cause fish kills and can be detrimental to the macroinvertebrate community. In the absence of adequate environmental controls, there is a likelihood of moderate to significant negative effects on aquatic ecosystems, including salmonids, in the temporary to short-term.

#### Chemical Spillage

The operation and maintenance of the machinery onsite involves the use of hydrocarbon derivatives such as diesel, hydraulic fluid (including brake fluid) and various lubricants. Common causes for spillage include burst hose pipes, leaking tanks, spillage during refill/maintenance, incidents at the holding tanks. This may, in the absence of adequate controls, result in the introduction of pollutants to aquatic environments. This would likely result in some moderate to significant negative short-term impacts on fish and sensitive macroinvertebrate species.

#### Wind Farm Watercourse Crossings

The effects caused by bridge crossings depend largely on their design and the nature of the river itself. Poorly designed bridges can block fish passage, genetically isolating resident fish species and making them vulnerable to becoming absent following severe drought/pollution events, as well as blocking access to much needed

spawning and rearing habitat for anadromous species. Generally, the bridging of smaller watercourses and drainage ditches is less impactful than bridging rivers, and clear span bridges are generally the preferred option as they negate the majority of the issues regarding fish passage and construction stage pollution. Advice on the appropriate design of watercourse crossings has been integrated into the project from an early design stage and the stream crossings on the wind farm are unlikely to result in the blocking of, or impediments to, the movement of aquatic species. The individual stream crossings and associated culvert design is described in **Section 5.3.5.5**.

Any works in or near watercourses may temporarily cause disturbance to the immediate aquatic species and habitats. In the absence of appropriate environmental control, it could also inadvertently result in increased run-off or discharge of potential pollutants with a similar effects to those described above for in respect of earthworks. In the absence of adequate mitigation, runoff during installation of the stream crossings is likely to result in moderate to significant negative local effects on aquatic ecosystems in the short-term.

The works on the haul route at Black Bridge will not require any in-stream works. This existing watercourse crossing is directly upstream of the River Barrow and River Nore SAC. At Black Bridge, it is estimated that 11m<sup>3</sup> of road cuttings will be removed, and disposed of at an approved facility, in preparation for strengthening works (the emplacement of concrete) over the bridge archway. The works will be carried out over a short time period and are not assessed as likely to result in the discharge of significant volumes of pollutants into the River Dinin. However, given the sensitivity of the location, proximate to the SAC, it will be necessary to fully mitigate any likelihood of pollution, no matter how remote these may be. Given the proximity to the sensitive aquatic ecosystem; it is concluded that, without adequate environmental controls, there is some potential for mobilisation of contaminants, including cementitious material, during the bridge strengthening work. The likely effect of the run-off of contaminants to the watercourse, given the relatively small scale of the works and the volumes of material to be used, would result in a significant temporary negative impact on local fish and sensitive macroinvertebrate species with such effects moderating to imperceptible further downstream of the works location. The risks identified are highly amenable to mitigation.

#### Grid Connection Watercourse Crossings

The installation of an underground grid connection cable may affect local watercourses. Due to the characteristics of the road network, the grid connection infrastructure will be predominately located within the confines of the road carriageway and not within any roadside verge. As described at **Section 3.5.3.2 (Chapter 3)**, Horizontal Directional Drilling (HDD) will occur at 3 no. locations along the grid connection route. The HDD will be required to avoid trenching/excavations within bridging structures which traverse 2 no. unnamed local watercourses, and the Kilderry stream. Launch and receptor pits will be excavated at either side of the crossings to accommodate the drilling rig. The bore will be at a depth of 3m below the bridging structures

In the absence of adequate environmental controls, these HDD crossings could result in run-off to watercourses and/or breakout of lubricants during the HDD process. The likelihood of such effects is remote given that HDD is a well proven method for crossing watercourses and is preferred to engineering solutions that involve direct in-stream

works. In the absence of appropriate mitigation, slight to moderate local temporary negative effects are assessed as likely to occur.

### Replant Lands

The replanting of lands may affect watercourses. The main issue pertaining to aquatic ecology is the release of sediments to watercourses during the planting and ongoing management of this land. However, as described at **Section 5.3.5.6** above, there are no major watercourses at the replant site and the County (Water) River is located several hundred metres from these lands. In this context, it is assessed that there is no significant likelihood of negative effects on aquatic ecosystems.

#### 5.4.5.2 Operational Phase

The likelihood of effects on aquatic ecology during the operational phase is very limited. It is assessed that there is a negligible likelihood of significant negative effects on aquatic ecosystems and species arising during the operational stage.

#### 5.4.5.3 Decommissioning Phase

The likelihood of effects on the local aquatic ecology during the decommissioning phase is similar in nature, if not in scope, to those assessed for the construction phase. In the absence of appropriate environmental controls, there is a likelihood of run off of silt and other contaminants to watercourses. In this scenario, there is a likelihood of slight to moderate, temporary to short-term, local negative effects on the aquatic species.

All decommissioning works will be governed by the same requirements to control habitat loss and damage, run-off or potential pollution to watercourses as have been implemented during the construction phase.

### 5.4.6 Other Taxa

No other taxa of conservation concern were found in the study area. A number of other taxa were noted within and adjacent to the wind farm site and along the grid connection route, none of which are of conservation concern in Ireland at present. Common Frog is listed on Annex V of the EU Habitats Directive and is also legally protected by the Irish Wildlife Acts (1976 – 2012 as amended) along with Common Lizard.

#### 5.4.6.1 Construction Phase

The construction phase could lead to habitat loss or disturbance of other taxa likely to be present such as Common Frog, Common Lizard and Smooth Newt. As mentioned previously, the wind farm footprint is dominated by conifer plantation (WD4) as well as agricultural grassland (predominately GA1).

There were no observations of Marsh Fritillary from the study area. There are a number of contemporary records of adult Marsh Fritillary on the wing from June 2021 (NBDC). These records were of adult butterflies from areas northeast of the wind farm site at Seskinrea and Red Bog (June 2021; NBDC). Historical records exist of Marsh Fritillary from S56 (through which the grid route traverses) and from S57 in which the works on the haul route are located.

While a variety of invertebrate fauna, including Lepidoptera species were observed, there was no area noted with suitability for breeding Dragonflies and Damselflies.

The remaining other taxa species recorded in the study area are not currently of conservation concern in Ireland. Frogs occur widely at the site and are likely to breed in pools, drains etc. across the site. Access track construction and upgrading and construction of hardstanding areas and turbine bases could reduce the amount of suitable breeding habitat for Frogs at the site. The footprint of the project is small, however, and the main habitats present are modified and not of high ecological value for Frogs and other taxa in general. The design of the project has avoided, insofar as possible, areas close to watercourses.

In the absence of appropriate mitigation, the construction of the project is assessed as likely to result in temporary slight negative localised effects on habitats of importance for other taxa.

The installation of the grid connection will involve relatively little habitat disturbance or permanent habitat loss – the grid cable will be laid predominately within the carriageway of public roads. With the application of standard environmental controls, the installation works are unlikely negatively affect other protected fauna occurring along the route.

#### 5.4.6.2 Operational Phase

No significant effects are predicted on other taxa during the operational phase of the project.

#### 5.4.6.3 Decommissioning Phase

Significant effects on other taxa as a result of the movement of plant and personnel during the decommissioning process are unlikely. All decommissioning works will be governed by the same requirements to control habitat loss and damage, run-off or pollution to watercourses as have been implemented during the construction phase.

#### Replant Lands

No significant effects are likely in relation to the diversity or abundance of other taxa at the replant lands. These lands are dominated by improved agricultural grassland (GA1) with no significant water features present.

#### 5.4.7 Cumulative Effects

The project as a whole has been assessed with other existing, permitted and proposed developments in the wider vicinity of the project site to evaluate the likelihood of significant effects on biodiversity which, when combined, may result in effects which are cumulatively significant.

The project as a whole has been assessed with other existing, permitted and proposed developments in the wider vicinity of the project site (see **Table 1.4, Chapter 1**) to evaluate the likelihood of significant effects on biodiversity which, when combined, may result in effects which are cumulatively significant.

The majority of consent applications pertain to one-off residential dwelling or farm buildings/structures along the local and regional roads. The scale of these applications will not have an effect on the designated sites in the wider receiving environment and therefore as stated in the accompanying NIS, there is no potential for significant in-combination/cumulative effects with the proposed development arising from such developments.

Given the nature of the subject project and the species that are most likely to be subject to cumulative and in-combination effects from other projects in the wider

area, developments such as other wind farms are highlighted as those of key relevance to the assessment of likely construction and operational phase effects. Accordingly, effects upon bird species through cumulative loss of habitat, displacement effects, collision mortality and barrier impacts; in addition to cumulative effects surface water quality; have been assessed.

The Seskin Wind Farm is located c. 2km northeast of the White Hill Wind Farm. 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. The site of the Seskin Wind Farm is dominated by commercial conifer plantation; some of which is likely to be lost to accommodate the construction and operation of the project. However, due to the abundance of this habitat type within the local and wider landscape, cumulative effects are not assessed as likely. The Seskin Wind Farm is also located within the same surface water sub-catchment as the subject project. Therefore, cumulative effects on aquatic habitats and species may, in the absence of appropriate environmental controls, arise.

The 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. No cumulative effects on sensitive habitats, aquatic habitats and species are likely to occur due to separation distance and given that the Freneystown is largely located within a different surface water sub-catchment.

The Bilboa Wind farm is located c. 4.5km northeast of the subject project. The wind farm site is located in an area dominated by conifer plantation over peatland. The wind farm site drains largely to the Nore catchment and partially to the Barrow. Due to separation distance, the findings of the assessments in the preceding sections, the measures described at **Section 5.5** below, and the measures set out in respect of the Bilboa Wind Farm; there is no likelihood of significant cumulative effects arising on designated sites, habitats, birds, mammals, and aquatic species.

The Pinewoods Wind Farm is located c. 20km northwest of the subject project. Given the findings of the EIAR and NIS in respect of that project, the mitigation measures to be implemented, the findings of the assessments in the preceding sections, the measures described at **Section 5.5** below, and the measures set out in respect of the Pinewoods Wind Farm; there is no likelihood of significant cumulative effects arising on designated sites, habitats, birds, mammals, and aquatic species.

The closest operational wind farm is located at Gortahile in Co Laois; c. 5.5km to the northeast. It is located in an upland area with a high proportion of mature forestry cover. No other operational wind farms are located within 10km of the subject project. Other more distant wind farms such as the Kilbranish Wind Farm and Greenoge Wind Farm in Co. Carlow and Foyle Wind Farm and Lisdowney Wind Farm in Co. Kilkenny are relatively distant from the proposed wind farm.

We are also aware of proposed wind farm developments at Ballynalacken, Co. Kilkenny, and Coolglass, Co. Laois; each of which are located in excess of 15km from the subject project.

Given the spatial arrangement of the respective wind farms and the intervening separation distances, it is assessed that there is no likelihood of cumulative collision risk

on avian or bat species; while there is no likelihood of a cumulative barrier effect on birds. There is some potential for cumulative disturbance and displacement effects; however, significant cumulative or in combination effects are highly unlikely.

No other projects were identified which are assessed as likely to act cumulatively on the local ecology (habitats and species) to result in significant adverse effects.

## 5.5 Mitigation Measures

From the outset, an iterative process of constraints led design was employed for the project whereby independent ecological expertise was utilised at an early design stage in identifying the constraints and designing the site layout to take account of these constraints. The siting of the turbines and associated infrastructure was informed by the environmental constraints.

The mitigation measures described below are designed to address and minimise the effects of the project.

### 5.5.1 Construction Phase

Mitigation to minimise the risk of adverse impacts upon designated sites and their conservation objectives are those chiefly relating to the environmental controls on works near watercourses and measures to minimise the risk of run-off to watercourses hydrologically connected to downstream Natura 2000 sites.

The measures required to avoid adverse construction phase effects on the designated sites potentially affected by the project (i.e. those hydrologically connected downstream) largely overlap with the commitments in relation to the protection of water quality. However, measures to ensure no disturbance and displacement occurs of Otter, or other aquatic/semi-aquatic species are also proposed. These measures are specifically detailed in the NIS.

The following sections detail the overall mitigation commitments to address the likely effects identified on the receiving environment as a result of the project. A suitably qualified Ecological Clerk of Works (ECoW) will be employed to oversee the full and proper implementation of the ecological mitigation strategy throughout the construction and commissioning of the project.

#### 5.5.1.1 Habitats

The following mitigation measures are proposed in respect of the likely effects of the project on habitat and flora:-

- There will be no removal/clearance of habitats, or movement of construction machinery outside of the development works area/footprint during the construction phase, where the works area/footprint will be clearly marked;
- Existing hedgerows and trees to be retained at/near the site will be protected in line with current guidelines (e.g. NRA 2006). Measures to protect trees will include the installation of tree protection barriers around the root protection zones of retained trees. Where essential works are required within the root protection zones, ground protection (such as a cellweb membrane) will be installed following consultation with a qualified and experience arborist and/or engineer, to minimise risks of damage to roots;
- The construction of the project will be undertaken in accordance with the detailed Construction Environmental Management Plan (CEMP) to be prepared prior to construction; and,
- Detailed surface water management measures have been incorporated into

the proposed wind farm design to reduce the likelihood of significant effects on water quality, including downstream designated sites. Furthermore, a self-imposed buffer from natural watercourses (apart from the stream crossings) has been employed during the design layout so as to avoid sensitive hydrological features. All general/sanitary waste generated at the site during construction will be appropriately managed prior to removal off site by licenced contractors with no disposal of waste to nearby water features.

### Hedgerow Establishment and Tree Planting

Overall, it is assessed that the loss of native trees and hedgerows is small in scale and the effect of its loss will be reduced through the planting of new native hedgerows and treelines. New hedgerows will be created, away from turbines to avoid attracting bats to these areas and existing hedgerows are to be retained and enhanced where possible with gaps to be restored as necessary with native hedgerow mix:-

- Native hedgerow whips to be planted consisting of White thorn *Crataegus monogyna*, Black thorn *Prunus spinose*, Guelder rose *Viburnum opulus*, Holly *Ilex aquifolium*, Hazel *Corylus avellana*, Spindle *Euonymus europaeus*, Dog rose *Rosa canina*; and,
- Native woodland trees to be planted and will include Oak *Quercus robur*, Alder *Alnus glutinosa*, Holly *Ilex aquifolium*, Apple *Malus sylvestris*, Hazel *Corylus avellana*, Downy birch *Betula pubescens*, Willow e.g. *Salix cinerea/aurita* and Scots pine *Pinus sylvestris*.

The plant species selected also align with the All-Ireland Pollinator Plan Guidelines for Wind Farms (NBDC, 2021) which will support local pollinator species such as butterflies, bumble bees and solitary bees.

### Invasive Plant Species

Prior to the commencement of vegetation clearance activity, a survey by an appropriately experienced ecologist will be carried out to confirm that no Third Schedule Plant species are present within the project site, including along the grid connection route and replant lands. If present, the full extent(s) of the invasive plant species will be mapped. The appointed contractor(s) will prepare and implement an Invasive Species Management Plan (ISMP) for the works with the input from a suitably qualified ecologist.

The ISMP, if required, will be clearly communicated to all site staff and will be adhered to fully under the supervision of the ECoW. The control of some species may require the use of herbicides, which can pose a risk to human health, to non-target plants or to wildlife. In order to ensure the safety of herbicide applicators and of other public users of the site, a qualified and experienced contractor will be employed to carry out all work. The contractor will refer to and implement the following, which provides detailed recommendations for the control of invasive species and noxious weeds: Chapter 7 and Appendix 3 of the TII Publication *The Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads* (NRA, 2008).

Maintaining site hygiene at all times in an area where invasive non-native species are present is essential to prevent further spread. The following site hygiene measures will be implemented onsite during the construction and/or for maintenance works during the operational stage where applicable:-

- Fence off the infested areas prior to and during construction works where possible in order to avoid spreading seeds or plant fragments around or off the construction site;
- Clearly identify and mark out infested areas. Erect signs to inform Contractors of the risk;
- Avoid if possible using machinery with tracks in infested areas;
- Clearly identify and mark out areas where contaminated soil is to be stockpiled on site and cannot be within 75m of any watercourse or within a flood zone;
- If soil is imported to the site for landscaping, infilling or embankments, the contractor will gain documentation from suppliers stating that it is free from invasive species;
- Ensure all site users are aware of measures to be taken and alert them to the presence of the Invasive Species Management Plan; and,
- Erection of adequate site hygiene signage in relation to the management of non-native invasive material as appropriate.

#### 5.5.1.2 Birds

- Construction operations will largely take place during the hours of daylight to minimise disturbances to roosting birds or any active crepuscular/nocturnal bird species;
- A Toolbox Talk will be prepared and incorporated as part of the construction phase site induction. A wildlife register will be maintained by the environmental site staff during the construction phase. Site staff will be encouraged to report any bird sightings of note made during the construction phase and this information will be logged by the environmental site staff. The site manager will continue to maintain a wildlife register throughout the operational phase;
- All lighting systems, at the electricity substation and compound, will be designed to minimise nuisance through light spillage. Shielded, downward directed lighting will be used wherever possible and all non-essential lighting will be switched off during the hours of darkness;
- All edible and putrescible wastes will be stored and disposed of in an appropriate manner. Similarly, all construction materials will be stored and stockpiled at prescribed locations and all waste materials will be disposed of to licensed facilities;
- Mitigation measures outlined in this EIAR to minimise and prevent the likely effects on aquatic habitats and species will be fully implemented. In addition, tree felling will be undertaken in accordance with the specifications set out in the Forest Service Forestry and Water Quality Guidelines (2000) and Forest Harvesting and Environmental Guidelines (2000), to ensure a tree clearance method that reduces the potential for sediment and nutrient runoff;
- Tree-felling and removal of mature vegetation will be undertaken outside of the bird breeding season (1 March – 1 August). Hedgerows and mature trees will be retained insofar as possible;
- To avoid effects on nesting birds, the works on the grid connection route will be carried outside of the bird breeding season where possible. If works on the grid connection route are to be carried out during the bird breeding season, the areas where works are to be carried out will be checked immediately prior to such works by a suitably qualified ecologist to ensure that no protected species are present. No works will proceed in areas identified to have nesting birds until an appropriately qualified and experienced ECoW is appointed to monitor the

construction activity and implementation of the environmental and ecological mitigation measures;

- Standard VP monitoring in accordance with the *Survey Methods for Use in Assessing the Impacts of Onshore Wind farms on Bird Communities* (Scottish Natural Heritage 2017) will be carried out during the construction phase by experienced ecologists. A VP survey will be carried out between mid-March and mid-August. If construction activity extends into the winter period (October-March) a winter VP survey will be carried out to monitor the occurrence of waders, wildfowl and raptors. The survey shall cover the development footprint and all areas within 500m of the works; and,
- A total of 30 no. bird nest boxes (woodcrete and/or recycled plastic) will be erected within the wind farm site during the construction phase with the selection of boxes and suitable deployment locations decided by a suitably qualified ecologist.

### 5.5.1.3 Mammals

- A pre-construction mammal survey will be carried out immediately prior to the commencement of vegetation clearance. All areas where vegetation and built features will be removed will be first checked for evidence of the presence of roosting bats;
- All watercourse crossings will be surveyed prior to the commencement of work to identify any resting or breeding sites of protected mammal species;
- An ecologist will supervise/check areas where tree-felling and vegetation removal will occur prior to and during construction. This will ensure that any site-specific issues in relation to wildlife will be highlighted and appropriate mitigation measures (e.g., NRA/TII guidelines) are applied;
- The outlier Badger setts recorded in vicinity of access tracks will be surveyed and activity confirmed ahead of any works, including vegetation clearance. NatureScot (2017) advises employing a minimum exclusion zone of 30m from active sett entrances to construction works, which is in line with NRA (2006) for non-breeding season works, although under these guidelines this increases to 50m of active setts during the breeding season (December to June inclusive), with no blasting or pile driving within 150m of active setts. A suitably experienced ecologist will assess the evidence of activity at these outlier setts and, if appropriate, discuss the need for derogation licence with the NPWS. The ecologist will advise on appropriate actions to ensure that the risk of disturbance to badgers is minimised;
- If any breeding or resting sites of protected mammal species are located at any stage in the construction phase, no works will continue until such time as the ECoW advises and/or any required derogation licences are in place;
- Mitigation measures outlined in this EIAR to minimise and prevent likely effects on aquatic habitats and species will be fully implemented. In addition, tree felling will be undertaken in accordance with the specifications set out in the Forest Service Forestry and Water Quality Guidelines (2000) and Forest Harvesting and Environmental Guidelines (2000), to ensure a tree clearance method that reduces the potential for sediment and nutrient runoff;
- Construction operations will largely take place during the hours of daylight to minimise disturbances to nocturnal mammal species;
- All lighting systems will be designed to minimise nuisance through light spillage. Shielded, downward directed lighting will be used wherever possible and all non-essential lighting will be switched off during the hours of darkness;

- All edible and putrescible wastes will be stored and disposed of in an appropriate manner;
- Any sightings of mammals on-site will be logged on the wildlife register. This includes any fatalities recorded during construction phase; and,
- A total of 30-bat boxes (woodcrete and/or recycled plastic) will be erected at suitable locations in the area, with the type of boxes and the deployment locations selected by a suitably qualified ecologist.

#### 5.5.1.4 Aquatic Ecology

The creation of a buffer zone around watercourses is one of the most important mitigations for a wind energy project in terms of aquatic ecology. Many of the water features associated with the site, such as drainage ditches, are dry during certain seasons/weather. Except for specific points, such as stream crossings, a 50m buffer around watercourses will be observed within which works will be limited and will require the installation of appropriate measures

The other major mitigation to prevent the potential impacts to the ecology of watercourses, is the design and implementation of a highly functional site drainage system, or Surface Water Management System, with integrated silt management and flow attenuation management. For this project, a bespoke drainage system taking into account parameters such as rainfall rates, gradient, area, etc was designed.

Measures integrated into the drainage system will include silt traps, settlement ponds<sup>13</sup>, check dams, silt fences, separated clean/dirty water drains and vegetated swales. Crucially, the site drainage system will not outflow to the existing drainage network directly, but will discharge, via settlement ponds and vegetated swales, to numerous buffered overland outfalls which will promote percolation and vegetation filtration. The large number of these outfalls across the site are intended to keep volumes at each outfall low thus ensuring high filtration efficiency and low erosion rates. The following are mitigations specific to the ecology of watercourses:-

- The input of silt will be managed using a range of techniques integrated into the design of the Surface Water Management System including Altmuller and Dettmer settlement ponds, check dams, silt fences, vegetated swales and buffered overland outfalls;
- The input of nutrients, the main source being clear felling, will also be managed using aspects of the site drainage system, particularly the vegetated swales and the overland outflows. Clear felling, in line with current timber industry practices, is part of the current land usage and the proposed drainage design will improve outfall from this existing practice;
- The input of cement to watercourses will be mitigated onsite. Where concrete is delivered to the wind farm site, only the chute will be cleaned onsite. Chute cleaning water is to be isolated in temporary lined wash-out pits. No discharge of cement contaminated water to the construction phase drainage system or directly to any artificial drain or watercourse will be allowed;
- The input of hydrocarbons and other chemicals to watercourses will be mitigated against onsite. All plant will be inspected and certified to ensure they are leak free and in good working order prior to use on the wind farm site. On-

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<sup>13</sup> Settlement ponds will be as described in Altmuller & Dettmer; a design element that has been proven to work, both in the short and long term, and have clearly demonstrated results in terms of habitat improvement and FPM population dynamics. They also provide excellent spawning and larval habitat for frogs and newts.

site re-fuelling of machinery will be carried out using a mobile double skinned fuel bowser. The fuel bowser will be re-filled off site and will be towed/driven around the wind farm site to where machinery are located. Any chemical storage areas will be bunded appropriately for the fuel storage volume. An emergency plan for the construction phase to deal with accidental spillages will be contained within the CEMP. Spill kits will be available to deal with accidental spillages. In a worst-case scenario, if there is an incident onsite, the site drainage system does not discharge directly to any watercourse, thus insulating watercourses from such an event;

- Hydromorphological changes to watercourses, brought about by changes within the catchment, will be mitigated to a large extent by the use of settlement ponds and check dams to attenuate water, as well as vegetation swales and overland outfalls to promote percolation. As such, hydromorphological changes within watercourses are not expected as a result of the project;
- A Water Quality Monitoring Plan be put in place and will provide for an inspection and maintenance plan for the site drainage system. 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;
- Any excess build-up of silt levels at dams, the settlement ponds, or any other drainage features that may decrease the effectiveness of the drainage feature, will be removed. This will be given careful consideration by the ECoW. During the construction phase field testing, sampling and analysis of a range of parameters with relevant regulatory limits and EQSs will be undertaken for each primary watercourse at the wind farm site. Monitoring shall be carried out following heavy rainfall events and during 95<sup>th</sup> percentile low flow rates (the flow which is surpassed 95% of the time) as this is the stage when pressures and threats are highest on aquatic biota;
- Stream crossings will primarily use box culverts for stream crossings 1, 2, 3 and 4, while a bottomless culvert is proposed for crossing 5. All small drains to be crossed within the site will be piped. The design and installation of these crossings will follow the guidelines set out in "*National Roads Authority National Roads Authority. (2005). Guidelines for the Crossing of Watercourses during the Construction of National Road Schemes*":-
  - In terms of the box culverts, the key measure is that culverts should be installed so that the bottom (invert) is at least 500mm below the grade line of the natural stream bed and that the culvert should be 'drowned out'<sup>14</sup>; this negates issues with fish passage. The open-bottom culvert is essentially a span bridge and the installation of it has no potential to cause fish passage issues. In terms of the piping of drains onsite, the pipes will be level, or close to level, and will be set below water level (drowned out) to ensure fish passage. In terms of ensuring water quality during the construction/installation of these stream crossings, each crossing will be site specific and the particulars will be agreed onsite between the engineers, the ECoW and IFI, however a number of basic principles will be used. Firstly, for the piped drain crossings, if sufficient depth of water is present in the drain, it may be best to drop the pipe into place and backfill. If excavation is required to get levels, it may be best to

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<sup>14</sup> Meaning that meaning that the culvert sits well below low water levels rather than perched above it

dam the drain with sandbags if flow is sufficiently low to permit this approach, or otherwise to dam the drain and overpump. Pipes in dry drains will be installed making sure to keep the slope at grade. For the culverts, a stretch of river will be electrofished before being dammed at both ends and overpumped; this will contain dirty water within the working cell while the excavation is taking place to attain the depth for the culvert. For the installation of the bottomless culvert it is likely that a temporary dam-and-flume will be put in place to allow for the infilling behind the abutments without water quality issues;

- All instream works will be carried out in the months of July, August and September to avoid the salmonid spawning season and to avoid the times when the young of the year are at their most vulnerable;
- In terms of directional drilling, the works, including launch and receiver pits, will be carried out outside 20m from each watercourse. This is the buffer zone width recommended by IFI. The drilling process shall be constantly monitored to detect any possible breakout or leaking of bentonite into the surrounding geology; this is gauged by observation and by monitoring pumping rates and pressures. Monitoring by an ecologist/environmental engineer will be required during directional drilling works. IFI and NPWS will be notified of the works in advance; and,
- In terms of crossing within the bridge deck, critical elements with respect to aquatic ecology include for the placement of a sealed silt fence at both sides of the bridge crossing point and to a minimum of 10m upstream and downstream of each crossing on both sides of the road to divert water and runoff from the road into silt traps at each corner of the road. The size and design of these silt traps will vary and be suited to local conditions. The silt traps and sealed silt fence will be installed prior to any construction works commencing at the bridge crossing. An ecologist/environmental engineer will again be monitoring for the duration of the works.

#### 5.5.1.5 Other Taxa

- Areas where soil or water is to be stored (e.g. settlement ponds) will be checked regularly throughout the construction phase for the presence of Frogs (and spawn) and other protected aquatic and semi-aquatic fauna. If protected species are present, the environmental staff will translocate these, if possible (under licence if applicable). The same measure will be applied for any drains or areas of standing water forded by construction machinery. These areas will be checked on an ongoing basis by the ECoW and any areas with breeding frogs, spawn or tadpoles will be mapped and if possible fenced off temporarily to allow Frogs to metamorphose. If such areas cannot be avoided by site traffic the environmental staff will translocate the frogs (adults/young) under licence if applicable;
- An updated survey for adult Marsh Fritillary, *Euphydras aurinia*, will be carried out in the year of construction (May/June) ideally before construction commences. Locations with Devil's Bit Scabious within the site (along the edge of existing access tracks) will be checked in September/October for the presence of larval webs. Marsh Fritillary butterfly is the only Irish insect listed under Annex II of the EU Habitats Directive. In the event that larval webs are recorded within the works area, mitigation measures will follow best practice guidelines as outlined in the 'Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes' (NRA, 2008);

- If other taxa such as other species of Lepidoptera, Common Viviparous Lizard etc. are recorded within or adjacent to the wind farm, or the haul route works locations or grid connection route, these sightings will be logged on the wildlife register; and,
- Any sightings of rare or protected invertebrates, amphibians etc. made in the course of operational phase monitoring will be recorded and if appropriate this information will be submitted to the National Biodiversity Data Centre.

### 5.5.2 Operational Phase

The requirements for operational phase monitoring and mitigation are substantially fewer than for the construction phase. Given the findings of the above assessments, operational phase measures are predominately related to birds and bats, as follows:-

- Bird activity will be monitored for 3-years post construction by a suitably qualified ecologist. Standard breeding bird surveys will be carried out (transects and point counts) and winter VP surveys will be undertaken with reference to standard methodology (e.g. SNH, 2017, Gilbert *et al.* 2011). Annual reports will be prepared and submitted to the Planning Authority (Authorities) as required;
  - Monthly fatality searches will be carried out around the turbine bases for the first 3 no. years of operation, with a minimum of half of the winter season searches using trained cadaver dogs (minimum 3 no. cadaver dog searches);
  - All feather spots and bird (and bat) carcasses will be photographed and logged and an annual fatality search report will be prepared and submitted to the Planning Authority (Authorities). Any fatalities noted by site staff or maintenance crews will be logged on the wildlife register and this register will be made available to the ecologist carrying out the monitoring program;
- Bird and bat boxes will be checked and maintained annually for the first 3-years of operation by a suitably qualified ecologist. Any boxes requiring maintenance or replacement will be identified and removed/replaced under the supervision of an ecologist;
- As a precautionary mitigation measure, in addition to the creation of buffers between the proposed turbines and surrounding vegetation (discussed above) reduced rotation speed will be implemented when turbines are idling. Automatic 'feathering' of idling blades will be implemented (through SCADA) to reduce rotation speed of blades to below 2rpm while idling. Feathering blades has been shown to be effective in reducing fatality rates of bats by up to 50% and does not result in a significant loss of energy output (NatureScot 2021). No additional control measures to avoid/reduce collision related bat fatalities are considered warranted in this instance; and,
- Monitoring of the bat activity at the wind farm during the operational phase is recommended, based on the NatureScot 2021 guidelines, as several bat species were recorded within and adjacent the project site. Under these guidelines and EUROBATS (Rodrigues *et al.*, 2008) guidelines, it is recommended that monitoring of bats be implemented for at least 3-years once the wind farm is operational. Surveys will be conducted from March/April to October/November inclusive, during temperate weather conditions (i.e. air temperatures not lower than 10°C, calm, dry and overcast conditions). This monitoring will include detector surveys of bat activity near all turbines and the continuing status of any nearby potential roosts. Passive detector(s) will be deployed at several locations, a number of these close to turbines and others remote from turbine locations, within the wind farm site during the summer/autumn months. These deployment locations will be

the same used in the pre-construction bat monitoring. An annual report of operational phase bat activity will be prepared and submitted for the attention of the Planning Authority (Authorities) as required:-

- Over the first three years of operation a combination of data will be collected from:-
  - bat activity monitoring (seasonal deployment of static bat detectors) including continuous monitoring at height (if feasible);
  - fatality search around turbines;
  - recording of weather data including wind speed and direction, air temperature, precipitation and barometric pressure;
- At the end of the first year of operation, the bat activity data will be reviewed by a suitably qualified and experienced ecologist and, if deemed necessary, a curtailment strategy will be implemented. It is anticipated that the clearance of vegetation to create bat buffers will limit bat activity in the vicinity of turbines and will be effective in reducing the potential for collision risk. However, as acknowledged in NatureScot (2021) it is difficult to predict how bat behaviour will change post-construction. Therefore, further mitigation informed by post-construction monitoring may be required. One such option is smart curtailment, whereby turbines identified in high-risk locations by post-construction monitoring are feathered to run at < 2rpm, while optimal flight conditions for bats occurs;
  - Any requirement for smart curtailment, and the parameters that would influence it, will be guided by the comprehensive post-construction monitoring methodology, which will clarify the bat usage of the site at turbine locations post-construction and identify the likely relationship with temporal and weather parameters, and any potential collision fatalities; and,
  - The need for, and implementation of, a smart curtailment strategy will be reviewed by a bat specialist at the end of the second and third years of operation taking into account the accumulated survey data.

As detailed in the SWMP, following the completion of construction and the re-vegetation of disturbed ground, the generation of 'dirty' water runoff will be significantly diminished. It is important to reiterate that areas of hardstanding will be impermeable and the majority of incident rainfall will percolate naturally to ground. The following aquatic ecology protection measures will also be implemented:-

- Infiltration interceptor drains will be retained for the duration of the project to ensure that up-slope ('clean') runoff is directed away from site infrastructure and managed in an appropriate manner;
- Swales and check dams (i.e. for the management of 'dirty' water) shall be retained for the duration of the project. The swales, having become vegetated, and check dams will act as a filtration feature for the low volume of surface water runoff arising and will be sufficient to ensure the avoidance of any deleterious matter being discharged to downstream watercourses. Accordingly, it is proposed that the silt/settlement ponds and lagoon-type sediment ponds will be decommissioned 1-year following the completion of construction. This period will ensure that the swales have become sufficiently vegetated to filter any silt/sediment which may arise;
- Interceptor drains will be installed up-gradient of all 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/roadside drains will be used to collect runoff from access tracks, turbine hardstanding areas and substation compound areas which may contain entrained suspended sediment, and channel it to settlement ponds for sediment settling;
- Transverse drains ('grips') will be constructed, where appropriate, in the surface layer of access tracks to divert any runoff into swales/track side drains;
- Check dams will be used along sections of access tracks drains to intercept silts at source. Check dams will be constructed from a 40mm non-friable crushed rock or similar;
- Swales and check dams 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; and,
- Settlement ponds will be designed in accordance the greenfield runoff rate requirements; and,
- Imported rock for construction purposes and road surfacing will be strong, well graded limestone which will be resistant to erosion and have a low likelihood to generate fines in hardstand runoff. The operation of the underground grid connection will not result in any likely hydrological or water quality effects and therefore do not require mitigation measures.

Mitigation measures relating to oils and fuels are as follows:-

- Fuels stored on site will be minimised. Any storage areas will be bunded appropriately for the fuel storage volume for the time period of the construction;
- The substation transformer and oil storage tanks will be located in a concrete bund, impervious to rainwater ingress, capable of holding 110% of the stored oil volume;
- Turbine transformers will be located within the turbines, and any leaks will be fully contained within the turbine thus eliminating any pathway for leakages to affect land and soil;
- Maintenance vehicles will be regularly inspected for leaks and fitness for purpose; and
- An emergency plan for the operational phase to deal with accidental spillages will be contained within an Operational-Phase Environmental Management Plan. Spill kits will be available to deal with accidental spillages.

### 5.5.3 Decommissioning Phase

Decommissioning works will be governed by the same requirements to control run-off or pollution to watercourses as have been implemented during the construction phase, as follows:-

- A decommissioning phase environmental management plan will be prepared in advance of the works. This will include all appropriate surface water and spoil management commitments;
- The site compound will need to conform to the construction phase mitigation measures including those related to lighting design and proper treatment of edible and putrescible wastes; and,
- Following reinstatement, the site will be monitored by a suitably qualified ecologist for a 2-year period to determine the progress of revegetation and if

necessary to introduce supplementary planting with native species. A reassessment of the site will be carried out at the end of Year-1 to assess the site's progression over the previous year and to take photographic evidence of the site vegetation status, drainage management and general site appearance.

## 5.6 Residual Effects

The mitigation measures described for the proposed White Hill Wind Farm development have been designed to minimise the impact of the development, from the construction of the wind farm infrastructure including the UGL and turbine delivery, through the operational phase and onto decommissioning. The constraints led design approach followed has been effective in identifying and insofar as possible avoiding potential risks of impacts to the receiving environment. The mitigation measures set out in the EIAR are comprehensive and backed by a detailed planning phase CMP.

### 5.6.1 Construction Phase

#### 5.6.1.1 Designated Sites

Taking cognisance of measures incorporated into the project design and mitigation measures to avoid effects which are considered in the preceding sections, it is concluded that the construction of the project will not have any residual adverse effect on the integrity of any designated site. With the implementation of the recommended mitigation measures, the project will not contribute to in-combination effects with other projects and activities including agriculture and silviculture on designated sites.

#### 5.6.1.2 Habitats & Botanical Species

The construction phase will result in the loss of areas of habitat of some local value. With the implementation of the mitigation strategy, the residual effect of the construction phase is assessed to be non-significant negative in the short-term and highly localised.

#### 5.6.1.3 Birds

With the application of the recommended mitigation measures during the construction phase, the residual effects on birds are assessed as likely to be non-significant negative, short-term and highly localised.

#### 5.6.1.4 Bats

With the implementation of the recommended mitigation measures during the construction phase, the residual effects on bats are assessed as likely to be non-significant negative, short-term and highly localised.

#### 5.6.1.5 Non-volant mammals

With the application of the recommended mitigation measures during the construction phase, the residual effects on non-volant mammals are assessed as likely to be non-significant to imperceptible negative, short-term and highly localised.

#### 5.6.1.6 Aquatic Ecology

With the implementation of the recommended mitigation and environmental controls, the residual effects of the construction phase are assessed as likely to be neutral imperceptible, temporary and localised.

### 5.6.1.7 Other Taxa

The residual impacts of the construction phase on other taxa are assessed as likely to be non-significant neutral, localised and temporary in nature.

## 5.6.2 Operational Phase

### 5.6.2.1 Designated Sites

The NIS concludes that the operation of the project will not have any residual adverse effect on the integrity of any Natura 2000 sites including the River Barrow & River Nore SAC and the River Nore SPA. There is no likelihood of any residual impacts on nationally designated sites as a result of the operation of the wind farm.

### 5.6.2.2 Habitats & Botanical Species

With the implementation of the mitigation strategy, the residual effect on habitats and botanical species is assessed to be imperceptible neutral and highly localised.

### 5.6.2.3 Birds

With the implementation of the mitigation strategy, the residual effect on birds is assessed to be imperceptible negative and highly localised.

### 5.6.2.4 Bats

With the application of the recommended mitigation measures, the residual effects on bats are assessed as likely to be imperceptible negative and highly localised.

### 5.6.2.5 Non-volant mammals

With the implementation of the mitigation strategy, the residual effect on non-volant mammals is assessed to be imperceptible neutral and highly localised.

### 5.6.2.6 Aquatic Ecology

With the implementation of the mitigation strategy, the residual effect on aquatic species is assessed to be neutral imperceptible and localised.

### 5.6.2.7 Other Taxa

The residual effects on other taxa are assessed as likely to be neutral imperceptible and localised.

## 5.6.3 Decommissioning Phase

### 5.6.3.1 Designated Sites

The NIS concludes that the decommissioning of the project will not have any residual adverse effect on the integrity of any Natura 2000 sites including the River Barrow & River Nore SAC and the River Nore SPA. Similarly, there will be no significant residual effects on any nationally designated wildlife conservation sites.

### 5.6.3.2 Habitats & Botanical Species

With the implementation of the mitigation strategy, the residual effect on habitats and botanical species is assessed as likely to be non-significant neutral and highly localised.

### 5.6.3.3 Birds

With the implementation of the mitigation strategy, the residual effect on birds is assessed as likely to be neutral imperceptible and highly localised.

#### 5.6.3.4 Bats

With the application of the mitigation strategy, the residual effect on bats is assessed as likely to be neutral imperceptible and highly localised.

#### 5.6.3.5 Non-volant mammals

With the implementation of the mitigation strategy, the residual effect on non-volant mammals is assessed as likely to be imperceptible neutral and highly localised.

#### 5.6.3.6 Aquatic Ecology

With the implementation of the mitigation strategy, the residual effect on aquatic ecology is assessed as likely to be neutral imperceptible and localised.

#### 5.6.3.7 Other Taxa

The residual effects on other taxa are assessed as likely to be neutral imperceptible and localised.

### 5.7 Conclusion

This ecological impact assessment has fully assessed the likelihood of adverse effects of all aspects of the project on the species and habitats in the receiving environment. Overall, it is assessed that the detailed monitoring and mitigation commitments will be effective in ensuring that there are no significant residual effects on biodiversity arising from the construction, operation or decommissioning of the project.

Separately, a NIS has fully assessed the potential impacts of all aspects of the project, on its own and in combination with other projects and plans, on designated Natura 2000 sites in the wider receiving environment. The NIS concludes that the implementation of environmental control measures means, in light of best scientific knowledge, that there will be no significant effects, either individually or in combination with other plans or projects, adversely affecting the conservation interests, conservation objectives or integrity of the River Barrow & River Nore SAC and the River Nore SPA or any other Natura 2000 sites.

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White Hill Wind Farm

# Environmental Impact Assessment Report

## Planning-Stage Construction & Environmental Management Plan

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## 1.0 Introduction

Galetech Energy Services (GES), on behalf of White Hill Wind Limited, has prepared this Planning-Stage Construction & Environmental Management Plan (CEMP) for the construction of the White Hill Wind Farm.

### 1.1 Purpose of this Report

This CEMP has been prepared to outline the management of activities during the construction of the project to ensure that all construction activities are undertaken in an environmentally responsible manner. This CEMP summarises the environmental commitments made in respect of the project and the measures to be adopted to ensure compliance with legislation and the requirements of statutory bodies.

This CEMP (Planning-Stage/Preliminary) is a live document and will be updated by the appointed contractor prior to the commencement of development. Prior to the commencement of construction, the updated CEMP will be reviewed by the Environmental Manager (EM) and Ecological Clerk of Works (EcoW), as necessary, to confirm the appropriateness of the measures set out therein. This CEMP will form part of the main civil construction works contract. The contractor will take account of the structure, content, methods and requirements contained within the various sections of this CEMP when further developing this document (to include environmental plans and other related construction management plans and method statements) as required.

### 1.2 Objectives of this CEMP

This CEMP has been developed in accordance with the Institute of Environmental Management and Assessment (IEMA) *Practitioner Environmental Management Plans Best Practice Series Volume 12 (December 2008)* and has been designed to address the proposed environmental construction strategies that are to be implemented in advance of and during the construction of the project.

This CEMP aims to define good working practices as well as specific actions required to implement mitigation requirements as identified in the Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), the planning process, and/or other licensing or consenting processes.

### 1.3 Structure of this CEMP

The CEMP has been structured such that it can be read as consolidated document or as discreet documents addressing specific environmental topics. In particular, we refer to the technical annexes enclosed which address specific matters such as spoil management, surface water management, waste management, and emergency responses.

A copy of the CEMP will be maintained in the site offices for the duration of the construction phase and will be available for review at any time. The contractor's EM will be responsible for the continued development of the CEMP throughout the construction phase.

Where specific construction management plans or method statements are prepared by the contractor, these will be inserted into the relevant section of this CEMP.

An overview of the structure of the CEMP is provided at **Figure 1**.

## 1.4 Roles & Responsibilities

White Hill Wind Limited, and its appointed Project Manager, will be responsible for the overall implementation of the environmental measures and procedures set out in the CEMP. The role of the Project Manager relates to compliance monitoring with the CEMP and other planning/environmental/licensing requirements. Additionally, the Project Manager shall be empowered to halt works where he/she considers that continuation of the works would be likely to result in a substantial environmental risk.

The Project Manager will also carry out site checks that the works are being undertaken in accordance with the CEMP and will prepare a record of same.

The contractor will appoint an EM who will be responsible for coordination and development of the CEMP and any other surveys, reports or construction management plans necessary for the discharge of the requirements of the CEMP. The EM will also review the contractors construction management plans as required, carry out compliance auditing during the construction phase and coordinate the Environmental Management Group (see below) and required liaisons between White Hill Wind Limited, the contractor, and other statutory authorities.

Prior to commencement of construction, the contractor will identify a core Environmental Management Group, comprising of specific project personnel and including the Project Manager, EM, and Ecological Clerk of Works (ECOW). The Environmental Management Group will meet monthly to discuss the monthly environmental report and will advise site personnel on areas where improvements may be made on site. The group will draw on technical expertise from relevant specialists where required and will liaise with other relevant external bodies as required.

## 1.5 Reporting Procedures

Appropriate reporting procedures are key to the proper implementation of the measures outlined within this CEMP, and include reporting between parties involved in the construction of the project and also external stakeholders, such as the relevant local authorities.

Emergency and environmental incident reporting procedures are set out in the Environmental & Emergency Response Plan (see **Annex 1**).

## 2.0 Description of the Project

White Hill Wind Limited intend to construct the White Hill Wind Farm which will consist of:-

- 7 no. wind turbines with an overall tip height of 185m, and all associated ancillary infrastructure;
- Upgrades to the turbine component haul route; and
- Construction of an electricity substation and installation of c. 15km of underground grid connection cable between the White Hill Wind Farm and the existing Kilkenny 110kV electricity substation; and
- All associated and ancillary site development, excavation, construction, landscaping and reinstatement works, including provision of site drainage infrastructure.

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. Forestry replant lands are located within County Monaghan; while candidate quarries which may supply construction materials are also located within counties Carlow and Kilkenny.

Various environmental reports have been prepared in respect of the project and have been utilised in the preparation of this CEMP, including:-

- Environmental Impact Assessment Report (Galetech Energy Services); and
- Natura Impact Statement (Ecology Ireland).

### 3.0 General Construction Sequence

The construction phase is likely to last for approximately 15-18 months from commencement of detailed site investigations through to the installation and commissioning of the turbines and ending with site reinstatement and landscaping.

The construction phase of the development will comprise a 6 no. day week with normal working hours from 07:00 to 19:00 Monday to Friday and 07:00 to 13:00 on Saturdays. It may be necessary to undertake works outside of these hours to avail of favourable weather conditions (e.g. during time of low wind speed to facilitate turbine erection etc.) or during extended concrete pours (e.g. where turbine foundation pours must be completed within 24 hours). Where construction activities are necessary outside of the normal working hours, local residents and the Planning Authorities will receive prior notification.

#### 3.1 Construction Method

The construction method will consist of the following general sequence:-

- Preliminary traffic management and surface water protection measures to be implemented;
- Upgrade works to the L7122, together with the creation of the adjacent site entrances, to be commenced and completed;
- Progressive installation of surface water protection measures;
- The construction of the site entrance, from the L3037, ensuring that requisite traffic visibility splays are provided;
- Establishment and continued management of borrow pits and spoil deposition areas;
- Progressive construction of internal on-site access tracks utilising material extracted from the on-site borrow pits and imported from local quarries;
- Construction of the temporary construction compound for off-loading materials and equipment, and to accommodate temporary site offices;
- Construction of bunded areas for oil, fuel and lubricant storage tanks;
- As the internal access tracks progress to each turbine location, tree felling will be completed and foundation excavations for the turbines will commence and foundations laid. The hardstanding areas will be constructed as track construction advances;
- Other temporary upgrade works along the turbine component haul route will be commenced;
- Once the on-site access tracks are completed, the trenching and laying of underground cabling will begin;
- Installation of turbines will commence once the on-site access tracks, hardstands, foundations and drainage measures are in place and the road upgrade works are complete. It is anticipated that each turbine will take approximately 1 no. week to install. Two cranes will be used for this operation. As each turbine is completed, the electrical connections will be made;

- Decommissioning of the temporary meteorological mast and installation of the permanent meteorological mast will then take place; and
- Progressive site reinstatement, restoration and landscaping including re-profiling of spoil deposition areas, removal of turbine storage areas; erection of post-and-wire fencing around turbines, access tracks and at site entrances; erection of gates and vegetation at site entrances; and decommissioning of the temporary construction compound.

The construction method for the substation and grid connection will consist of the following general sequence (to be completed concurrently with wind farm construction):-

- The construction of the site entrance (from the L7122) and access track;
- Site preparatory and groundworks associated with the substation compound footprint including control building;
- Construction of the control building;
- Construction of bases or plinths for electrical apparatus, including Electricity Storage System containers;
- Erection of palisade fencing around substation;
- Installation of internal and external electrical apparatus in control building and within compound area;
- Installation of underground electricity line (including joint bays, communication chambers, and HDD works) between substation and Kilkenny 110kV electricity substation;
- Connection of underground electricity to the respective substations;
- Commissioning of electrical apparatus and underground electricity line; and
- Progressive site reinstatement, restoration, landscaping and planting proposals including the installation of stockproof fencing and the erection of gates.

Once the turbines are installed, and the substation and electrical system completed, the turbines will be tested and commissioned.

In addition to the roles of the EM and ECoW described above, the construction phase will be supervised by a range of environmental and engineering specialist personnel; including a Project Supervisor for the Construction Stage (PSCS), Archaeological Clerk of Works (ACoW), and Geotechnical Clerk of Works (GCoW), among others; who will liaise closely with the appointed contractor's EM to monitor and to ensure that all applicable measures are implemented.

### 3.2 Site Entrances

A total of 3 no. site entrances, in County Carlow, will be required to facilitate access to the wind farm; comprising upgrades to 2 no. existing entrances and 1 no. newly constructed access point. Site entrances will be developed and constructed in accordance with the provisions of the *Carlow County Development Plan 2022-2028*.

Following the delivery of turbine components, the scale of the wind farm site entrances will be reduced but will be reinstated such that they remain capable of accommodating abnormal loads in the event of a major component change-out during the operational phase of development. The reinstatement of the site entrances will comprise the erection of post and rail fencing, gates and the planting of hedgerows. Hedgerows will be appropriately located to allow for future growth while ensuring, at all times, that visibility splays are maintained during the operational phase.

2 no. temporary entrances will be constructed, and accompanied by c. 150m of access track, to facilitate the navigation of the junction of the N78 and L1834 in

County Kilkenny. Visibility splays will be provided in accordance with Section 13.22.1 of the *Kilkenny City & County Development Plan 2021-2027*; with sightlines of 215m being provided at the access point which interfaces with the N78 and 90m for the entrance which interfaces with the L1834. These sight entrances will be utilised solely for the delivery of turbine components to the wind farm site and, following the delivery of components all transportation vehicles will utilise the public road network. Following the completion of all turbine component deliveries, the temporary site entrances and access track will be reinstated to their pre-existing condition, including the replanting of all removed hedgerows.

A further 1 no. site entrance, in County Kilkenny, will be required to accommodate access to the electricity substation. This site entrance will not be required to accommodate abnormal sized vehicles and will, therefore, be constructed to standard specifications. This entrance will be utilised throughout the lifetime of the substation and will be secured with post-and-wire fencing and gated to prevent unauthorised access. Any hedgerow removed will be replanted to allow for future growth while ensuring, at all times, that visibility splays are maintained

### 3.3 Hardstanding Areas and On-Site Access Tracks

The areas of hardstanding for crane operations and on-site access tracks will generally be constructed as follows:-

- Topsoil and subsoil will be removed and stored in separate mounds in appropriate areas adjacent to the crane site/access tracks;
- Rock/stone will be laid on a geo-textile mat (where required) and compacted in layers to an appropriate depth. The sub-layers of the hardstanding areas and access tracks will be constructed of rock/stone excavated from the on-site borrow pits, with the upper layer comprising capping material imported from a local quarry (or quarries). All such areas of hardstanding will be permeable to avoid significant volumes of surface water run-off;
- Where access tracks are required to cross drainage ditches, these will be piped or spanned with an appropriate bridging structure. Where access tracks cross a watercourse, bottomless culverts will be installed (where possible) to prevent any interference with the hydraulic capacity of the watercourse; and,
- Areas of temporary hardstanding (for turbine component storage and crane assembly) will be reinstated following the construction phase by removing aggregates, replacing the excavated spoil and reseeding. The crane hardstandings and on-site access tracks will be retained during the operational phase to facilitate access for maintenance personnel and in the event of a major component change-out.

### 3.4 Temporary Construction Compound

Topsoil will be removed from the required area and side cast for temporary storage adjacent to the compound area. The compound base will be made up of well graded aggregates, compacted as necessary. A designated waste management area and fuels and chemicals storage area will be provided along with site offices, parking, staff welfare facilities and equipment storage areas. The compound will be fenced with temporary security fencing to restrict access. Following the completion of the construction phase, the temporary construction compound will be fully removed and the compound will be reinstated with excavated material and reseeded.

### 3.5 Chemical Storage and Refuelling

Storage areas for oils, chemicals and fuels will comprise bunded areas of hardstand of sufficient capacity within the temporary construction compound. Bunds will have a watertight roof structure and will be supplied by a licensed manufacturer to enable adequate safe storage for the quantities of material required. An adequate supply of spill kits will be readily available in order to clean up any minor spillages should they occur. A hydrocarbon interceptor will be installed within the surface water drainage system during the construction phase to trap any hydrocarbons that may be present. As part of the design process, a 50m buffer has been observed around all surface water features and no fuel/chemicals shall be handled or stored within this zone.

From the construction compound, fuel will be transported to works area by a 4x4 in a double skinned bowser with drip trays under a strict protocol and carried out by suitably trained personnel. The bowser/4x4 will be fully stocked with spill kits and absorbent material, with delivery personnel being fully trained to deal with any accidental spills. The bowser will be bunded appropriately for its carrying capacity. As above, a 50m buffer will be observed around all surface water features and no refuelling will be permitted within this zone.

### 3.6 Construction Waste Management

Waste will be generated during the construction phase and the main items of anticipated construction waste are as follows:-

- Hardcore, stone, gravel, concrete, plaster, topsoil, subsoil, timber, concrete blocks and miscellaneous building materials;
- Waste from chemical portaloo toilets;
- Plastics; and
- Oils and chemicals.

Waste disposal measures proposed include:-

- On-site segregation of all waste materials into appropriate categories including, for example, topsoil, bedrock, concrete, bricks, tiles, oils /diesels, metals, dry recyclables e.g. cardboard, plastic, timber;
- All waste materials will be stored in skips or other suitable and sealed receptacles in a designated area of the construction compound;
- Wherever possible, left over materials (e.g. timber off-cuts) and any suitable demolition materials shall be re-used on-site;
- Uncontaminated excavated material (rock, topsoil, sub-soil, etc.) will be re-used on-site in preference to importation of clean inert fill;
- Bedrock may be encountered during foundation excavation. If bedrock is encountered it will be utilised for infill during construction;
- All waste leaving the site will be transported by permitted contractors and taken to suitably licensed or permitted facilities and will be recycled, recovered or reused, where possible; and
- All waste leaving the site will be recorded in accordance with legal requirements and copies of relevant documentation maintained.

### 3.7 Construction Employment

It is estimated that up to 100 no. people will be employed during the 12-18 month construction phase. The actual number will depend on the activities being undertaken at any given time and will vary throughout the course of the construction

programme. Employment will be the responsibility of the construction contractor but it is likely that the workforce will include labour from the local area.

### 3.8 Construction Traffic

Vehicular traffic required for the construction phase is likely to include:-

- Articulated trucks (HGVs) to bring initial equipment onto site and later to bring the turbine components, electrical cables, steel reinforcement for foundations, anemometer mast, and ancillary equipment;
- Tipper trucks and excavation plant involved in site development and excavation works;
- Cranes to erect the turbines;
- Miscellaneous vehicles and handling equipment, including vehicles associated with construction workforce.

Effects from construction traffic could include temporarily increased local traffic levels and traffic noise. Construction traffic on the local road network will be managed in accordance with a Traffic Management Plan and the requirements of the Planning Authority (Authorities). This may include the installation of temporary road signage and traffic lights, as appropriate. Noise arising from construction traffic would be localised, temporary and of a short term duration.

Deliveries of turbine components will take place at times to avoid peak traffic periods, and are likely to occur during night-time hours. All abnormal loads will be accompanied by an advance escort vehicle.

Traffic mitigation measures will be implemented during the construction phase, as follows:-

- Signage at site entrances giving access information;
- Temporary traffic restrictions kept to minimum duration and extent;
- Diversions put in place to facilitate continued use of roads, where restrictions have to be put in place (e.g. along the UGL route) ;
- Construction traffic management – one way systems where possible and strictly enforced speed limits;
- Provision of a designated person to manage access arrangements and act as a point of contact to the public; and
- All temporary road alterations and public road upgrades to be carried out in full consultation with the Planning Authority.

Once the turbines are operational, the traffic movements will be greatly reduced to, on average, once/twice per week by a light commercial vehicle for maintenance purposes. There may be an occasional need to replace some turbine components but these are unlikely to be frequent.

## 4.0 Environmental Management Measures

### 4.1 'Designed-In' Measures

The following measures will be implemented, as standard, as part of the construction of the project:-

- Vegetation, soil, subsoil and rock removed during the construction of turbine foundations will be side-cast and appropriately stockpiled and, in so far as is practicable, re-used to reinstate the foundation and provide additional ballast. Any excess material arising will be utilised, firstly, for reinstatement purposes elsewhere within the project site (e.g. landscaping of hardstands and access

tracks or reinstatement of borrow pits) or, as required, deposited at the dedicated spoil deposition areas;

- Temporary set down areas will be located immediately adjacent to each hardstand during the construction phase to accommodate the temporary storage of turbine components following their delivery to the project site, and crane components during crane assembly. Following the erection of the turbines, these set-down areas will be reinstated with excavated material, re-seeded and allowed to revegetate;
- It should be noted that, due to the presence of habitats of 'higher ecological value' in the vicinity of T3, temporary blade component set-down/storage areas will not be constructed at this location and turbine components for T3 will be delivered on a 'just-in-time' basis;
- A geotextile layer may be needed in some locations to avoid any subsequent vehicle access problems. Some cut/fill in the construction of the access tracks will be necessary to ensure that horizontal and vertical alignments are suitable to accommodate abnormal HGV loads and to provide adequate drainage. The wind turbine manufacturer shall be consulted during the post-consent detailed design process to ensure that the access tracks are suitable to accommodate turbine components. This may necessitate some immaterial deviations in the precise alignment of the access tracks;
- Following the construction phase, access tracks, passing bays and turning heads that are not required during the operational phase will be reinstated, wherever possible. It is likely, however, that the majority of the tracks will be required during the operational phase for maintenance operations and will be used as part of ongoing agricultural activities within the subject site;
- Where it is necessary for access tracks to cross these drains/watercourses, the relevant bodies (e.g. Inland Fisheries Ireland, Office for Public Works (OPW), etc.) will be consulted prior to construction. As appropriate, a Section 50 Licence application will be made to the OPW prior to the installation of culverts/bridging structures over relevant watercourses;
- The site entrance from the L3037 will be constructed in accordance with the requirements of the Planning Authority regarding the provision of appropriate site visibility splays to ensure traffic safety<sup>1</sup>. Due to the narrow profile and existing alignment of the L7122 local road in the townland of Ridge, it will not be possible to provide full visibility splays as required by the Planning Authority. However, Section 16.10.7 of the *Carlow County Development Plan 2022-2028* states that where full visibility splays are not achievable, a reduced sightline may be permissible where a road safety audit has been completed and demonstrates that there will be no adverse effect on road safety as a consequence of the reduced visibility. Accordingly, a Road Safety Audit has been prepared in respect of works at this location;
- The temporary construction compound has been located and designed such that all cabins, storage containers, waste management facilities and bunded areas will be located a minimum distance of 50m from all natural watercourses in order to minimise the risk of pollution and the discharge of deleterious matter to watercourses. Stormwater which may arise from the roofs of cabins, containers or from sealed bunds will be passed through an oil interceptor prior to being discharged to the local environment;

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<sup>1</sup> Visibility splays will be provided in accordance with Table 16.5 and Section 16.10.7 of the *Carlow County Development Plan 2022-2028*.

- Prior to the commencement of development at the site, a detailed Spoil Management Plan will be prepared following the post-consent detailed design process and will address the re-use, reinstatement, storage and restoration of all material excavated during the construction phase including detailed methodologies regarding the establishment and management of the spoil deposition areas for the project;
- Where a borrow pit is opened and following the extraction of required material, it will be reinstated with surplus material generated from excavations elsewhere within the project site. Subsoil will be graded to match the surrounding ground profile, topped with topsoil, re-seeded and returned to agricultural pasture;
- Following the completion of construction, the deposition areas will be graded to match the profile of surrounding land and will be reseeded. Works at the spoil deposition areas will be monitored, on a weekly basis during the construction phase and monthly for a 6-month period thereafter, by an appropriately qualified geotechnical engineer;
- In the event that material is generated which is unsuitable for storage within the deposition areas (e.g. tarmac cuttings from site entrance construction), this shall be removed from site and disposed of at a licensed waste disposal facility;
- A micro-siting allowance of 20m in any direction is proposed for wind turbines in accordance with Section 5.3 of the *Wind Energy Development Guidelines for Planning Authorities 2006*<sup>2</sup>. It is anticipated that the agreed micro-siting distance will form a condition accompanying a grant of planning permission. It is also proposed that hardstands, access tracks, meteorological mast, and underground cables may be immaterially micro-sited subject to compliance with the mitigation measures included in this EIAR;
- During the delivery of turbine components to site, all HGVs will be accompanied by escort vehicles. An Garda Síochána will also be informed prior to turbine component transportation as it will be necessary to temporarily close junctions as the components pass through;
- Only fully licensed quarries which have been subject to EIA and have appropriate planning permission for the volumes of material to be extracted will be used. These aggregates are slated for extraction in the normal course of the relevant quarry's business and therefore will have no additional likely significant environmental impacts above and beyond those normally entailed in the operation of the quarry;
- All trenching works will be undertaken to ensure that only short sections of trench are open at any one time. Excavated materials will be stored separately (subsoil, topsoil, and aggregates) for use during the reinstatement of the trench/joint bays/communication chambers or disposal to an appropriate licensed facility as necessary;
- Prior to the commencement of construction, a detailed Method Statement will be prepared by the contractor outlining the precise methodology to be put in place during the trenching phase. This Method Statement will be reviewed by the Environmental Manager (EM; to be appointed by the contractor) to ensure that the environmental protective measures to be implemented are suitable and to the required standard;
- Prior to the commencement of drilling operations, the appointed contractor will prepare a detailed Method Statement outlining the precise methodology to be

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<sup>2</sup> Flexibility regarding wind turbine positioning is also referred to at Section 7.5 of the Draft Revised Wind Energy Development Guidelines 2019.

followed. This statement may be reviewed as necessary by the relevant planning authorities;

- All tree felling to be undertaken will be the subject of a felling licence application to the Forest Service in accordance with the Forestry Act 2014 and the Forestry Regulations 2017;
- As described above, trees and hedgerows will be felled and removed to facilitate the physical footprint of the project. The extent of vegetation removal has, by design, been minimised and no vegetation will be unnecessarily removed. As part of the reinstatement process; all trees felled and hedgerow removed in the construction of wind farm infrastructure will be replaced elsewhere within the project site, particularly along arterial access tracks;
- A preliminary Surface Water Management Plan (SWMP) has been prepared for the construction phase of the project. This SWMP will be further developed prior to the commencement of development, following the post-consent detailed design process, and will incorporate the precise implementation and siting of surface water management infrastructure;
- The construction phase of the development will comprise a 6-day week with normal working hours from 07:00 to 19:00 Monday to Friday and 07:00 to 13:00 on Saturdays. It may be necessary to undertake works outside of these hours to avail of favourable weather conditions (e.g. during times of low wind speed to facilitate turbine erection etc.) or during extended concrete pours (e.g. where turbine foundation pours must be completed within 24-hours). Where construction activities are necessary outside of the normal working hours, local residents and the Planning Authority will receive prior notification;
- A detailed CEMP will be prepared in advance of all construction activities and will incorporate all mitigation measures proposed in this EIAR;
- The construction phase will be supervised by a range of environmental and engineering specialist personnel; including a Project Supervisor for the Construction Stage (PSCS), Ecological Clerk of Works (ECoW), Archaeological Clerk of Works (ACoW), and Geotechnical Clerk of Works (GCoW), among others; who will liaise closely with the Environmental Manager to monitor and to ensure that all applicable measures are implemented;
- Following the delivery of turbine components, the scale of the wind farm site entrances will be reduced but will be reinstated such that they remain capable of accommodating abnormal loads in the event of a major component change-out during the operational phase of development. The reinstatement of the site entrances will comprise the erection of post and rail fencing, gates and the planting of hedgerows. Hedgerows will be appropriately located to allow for future growth while ensuring, at all times, that visibility splays are maintained during the operational phase;
- Following the completion of all turbine component deliveries, the temporary site entrances and access track will be reinstated to their pre-existing condition, including the replanting of all removed hedgerows;
- Where access tracks are required to cross drainage ditches, these will be piped or spanned with an appropriate bridging structure. Where access tracks cross a watercourse, bottomless culverts will be installed (where possible) to prevent any interference with the hydraulic capacity of the watercourse;
- Areas of temporary hardstanding (for turbine component storage and crane assembly) will be reinstated following the construction phase by removing aggregates, replacing the excavated spoil and reseeding. The crane hardstandings and on-site access tracks will be retained during the operational

phase to facilitate access for maintenance personnel and in the event of a major component change-out; and

- Waste will be generated during the operational phase including, for example, cooling oils, lubricating oils and packaging from spare parts or equipment. All waste will be removed from site and reused, recycled or disposed of in accordance with best-practice and all regulations at a licensed facility.

## 4.2 Population & Human Health

No measures, specific to population and human health, are necessary during the construction phase. Local residents and communities will be protected through the implementation of measures irrelevant to other topics including the protection of water quality, minimisation of dust emissions, minimisation of noise emissions, and appropriate traffic management procedures.

## 4.3 Biodiversity

### 4.3.1 Habitats

The following mitigation measures are proposed in respect of the likely effects of the project on habitat and flora:-

- There will be no removal/clearance of habitats, or movement of construction machinery outside of the development works area/footprint during the construction phase, where the works area/footprint will be clearly marked;
- Existing hedgerows and trees to be retained at/near the site will be protected in line with current guidelines (e.g. NRA 2006). Measures to protect trees will include the installation of tree protection barriers around the root protection zones of retained trees. Where essential works are required within the root protection zones, ground protection (such as a cellweb membrane) will be installed following consultation with a qualified and experience arborist and/or engineer, to minimise risks of damage to roots;
- The construction of the project will be undertaken in accordance with the detailed Construction Environmental Management Plan (CEMP) to be prepared prior to construction; and,
- Detailed surface water management measures have been incorporated into the proposed wind farm design to reduce the likelihood of significant effects on water quality, including downstream designated sites. Furthermore, a self-imposed buffer from natural watercourses (apart from the stream crossings) has been employed during the design layout so as to avoid sensitive hydrological features. All general/sanitary waste generated at the site during construction will be appropriately managed prior to removal off site by licenced contractors with no disposal of waste to nearby water features.

### Hedgerow Establishment and Tree Planting

Overall, it is assessed that the loss of native trees and hedgerows is small in scale and the effect of its loss will be reduced through the planting of new native hedgerows and treelines. New hedgerows will be created, away from turbines to avoid attracting bats to these areas and existing hedgerows are to be retained and enhanced where possible with gaps to be restored as necessary with native hedgerow mix.

- Native hedgerow whips to be planted consisting of White thorn *Crataegus monogyna*, Black thorn *Prunus spinosa*, Guelder rose *Viburnum opulus*, Holly *Ilex aquifolium*, Hazel *Corylus avellana*, Spindle *Euonymus europaeus*, Dog rose *Rosa canina*; and,

- Native woodland trees to be planted and will include Oak *Quercus robur*, Alder *Alnus glutinosa*, Holly *Ilex aquifolium*, Apple *Malus sylvestris*, Hazel *Corylus avellana*, Downy birch *Betula pubescens*, Willow e.g. *Salix cinerea/aurita* and Scots pine *Pinus sylvestris*

The plant species selected also align with the All-Ireland Pollinator Plan Guidelines for Wind Farms (NBDC, 2021) which will support local pollinator species such as butterflies, bumble bees and solitary bees.

### Invasive Plant Species

Prior to the commencement of vegetation clearance activity, a survey by an appropriately experienced ecologist will be carried out to confirm that no Third Schedule Plant species are present within the project site, including along the grid connection route and replant lands. If present, the full extent(s) of the invasive plant species will be mapped. The appointed contractor(s) will prepare and implement an Invasive Species Management Plan (ISMP) for the works with the input from a suitably qualified ecologist.

The ISMP, if required, will be clearly communicated to all site staff and will be adhered to fully under the supervision of the ECoW. The control of some species may require the use of herbicides, which can pose a risk to human health, to non-target plants or to wildlife. In order to ensure the safety of herbicide applicators and of other public users of the site, a qualified and experienced contractor will be employed to carry out all work. The contractor will refer to and implement the following, which provides detailed recommendations for the control of invasive species and noxious weeds: Chapter 7 and Appendix 3 of the TII Publication *The Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads* (NRA, 2008).

Maintaining site hygiene at all times in an area where invasive non-native species are present is essential to prevent further spread. The following site hygiene measures will be implemented onsite during the construction and/or for maintenance works during the operational stage where applicable:-

- Fence off the infested areas prior to and during construction works where possible in order to avoid spreading seeds or plant fragments around or off the construction site;
- Clearly identify and mark out infested areas. Erect signs to inform Contractors of the risk;
- Avoid if possible using machinery with tracks in infested areas;
- Clearly identify and mark out areas where contaminated soil is to be stockpiled on site and cannot be within 75m of any watercourse or within a flood zone;
- If soil is imported to the site for landscaping, infilling or embankments, the contractor will gain documentation from suppliers stating that it is free from invasive species;
- Ensure all site users are aware of measures to be taken and alert them to the presence of the Invasive Species Management Plan; and,
- Erection of adequate site hygiene signage in relation to the management of non-native invasive material as appropriate.

#### 4.3.2 Birds

- Construction operations will largely take place during the hours of daylight to minimise disturbances to roosting birds or any active crepuscular/nocturnal bird species;

- A Toolbox Talk will be prepared and incorporated as part of the construction phase site induction. A wildlife register will be maintained by the environmental site staff during the construction phase. Site staff will be encouraged to report any bird sightings of note made during the construction phase and this information will be logged by the environmental site staff. The site manager will continue to maintain a wildlife register throughout the operational phase;
- All lighting systems, at the electricity substation and compound, will be designed to minimise nuisance through light spillage. Shielded, downward directed lighting will be used wherever possible and all non-essential lighting will be switched off during the hours of darkness;
- All edible and putrescible wastes will be stored and disposed of in an appropriate manner. Similarly, all construction materials will be stored and stockpiled at prescribed locations and all waste materials will be disposed of to licensed facilities;
- Mitigation measures outlined in this EIAR to minimise and prevent the likely effects on aquatic habitats and species will be fully implemented. In addition, tree felling will be undertaken in accordance with the specifications set out in the Forest Service Forestry and Water Quality Guidelines (2000) and Forest Harvesting and Environmental Guidelines (2000), to ensure a tree clearance method that reduces the potential for sediment and nutrient runoff;
- Tree-felling and removal of mature vegetation will be undertaken outside of the bird breeding season (1 March – 1 August). Hedgerows and mature trees will be retained insofar as possible;
- To avoid effects on nesting birds, the works on the grid connection route will be carried outside of the bird breeding season where possible. If works on the grid connection route are to be carried out during the bird breeding season, the areas where works are to be carried out will be checked immediately prior to such works by a suitably qualified ecologist to ensure that no protected species are present. No works will proceed in areas identified to have nesting birds until an appropriately qualified and experienced ECoW is appointed to monitor the construction activity and implementation of the environmental and ecological mitigation measures;
- Standard VP monitoring in accordance with the *Survey Methods for Use in Assessing the Impacts of Onshore Wind farms on Bird Communities* (Scottish Natural Heritage 2017) will be carried out during the construction phase by experienced ecologists. A VP survey will be carried out between mid-March and mid-August. If construction activity extends into the winter period (October-March) a winter VP survey will be carried out to monitor the occurrence of waders, wildfowl and raptors. The survey shall cover the development footprint and all areas within 500m of the works; and,
- A total of 30 no. bird nest boxes (woodcrete and/or recycled plastic) will be erected within the wind farm site during the construction phase with the selection of boxes and suitable deployment locations decided by a suitably qualified ecologist.

#### 4.3.3 Mammals

- A pre-construction mammal survey will be carried out immediately prior to the commencement of vegetation clearance. All areas where vegetation and built features will be removed will be first checked for evidence of the presence of roosting bats;

- All watercourse crossings will be surveyed prior to the commencement of work to identify any resting or breeding sites of protected mammal species;
- An ecologist will supervise/check areas where tree-felling and vegetation removal will occur prior to and during construction. This will ensure that any site-specific issues in relation to wildlife will be highlighted and appropriate mitigation measures (e.g., NRA/TII guidelines) are applied;
- The outlier Badger setts recorded in vicinity of access tracks will be surveyed and activity confirmed ahead of any works, including vegetation clearance. NatureScot (2017) advises employing a minimum exclusion zone of 30m from active sett entrances to construction works, which is in line with NRA (2006) for non-breeding season works, although under these guidelines this increases to 50m of active setts during the breeding season (December to June inclusive), with no blasting or pile driving within 150m of active setts. A suitably experienced ecologist will assess the evidence of activity at these outlier setts and, if appropriate, discuss the need for derogation licence with the NPWS. The ecologist will advise on appropriate actions to ensure that the risk of disturbance to badgers is minimised;
- If any breeding or resting sites of protected mammal species are located at any stage in the construction phase, no works will continue until such time as the ECoW advises and/or any required derogation licences are in place;
- Mitigation measures outlined in this EIAR to minimise and prevent likely effects on aquatic habitats and species will be fully implemented. In addition, tree felling will be undertaken in accordance with the specifications set out in the Forest Service Forestry and Water Quality Guidelines (2000) and Forest Harvesting and Environmental Guidelines (2000), to ensure a tree clearance method that reduces the potential for sediment and nutrient runoff;
- Construction operations will largely take place during the hours of daylight to minimise disturbances to nocturnal mammal species;
- All lighting systems will be designed to minimise nuisance through light spillage. Shielded, downward directed lighting will be used wherever possible and all non-essential lighting will be switched off during the hours of darkness;
- All edible and putrescible wastes will be stored and disposed of in an appropriate manner;
- Any sightings of mammals on-site will be logged on the wildlife register. This includes any fatalities recorded during construction phase; and,
- A total of 30-bat boxes (woodcrete and/or recycled plastic) will be erected at suitable locations in the area, with the type of boxes and the deployment locations selected by a suitably qualified ecologist.

#### 4.3.4 Aquatic Ecology

The creation of a buffer zone around watercourses is one of the most important mitigations for a wind energy project in terms of aquatic ecology. Many of the water features associated with the site, such as drainage ditches, are dry during certain seasons/weather. Except for specific points, such as stream crossings, a 50m buffer around watercourses will be observed within which works will be limited and will require the installation of appropriate measures;

The other major mitigation to prevent the potential impacts to the ecology of watercourses, is the design and implementation of a highly functional site drainage system, or Surface Water Management System, with integrated silt management and flow attenuation management. For this project, a bespoke drainage system taking into account parameters such as rainfall rates, gradient, area, etc was designed.

Measures integrated into the drainage system will include silt traps, settlement ponds<sup>3</sup>, check dams, silt fences, separated clean/dirty water drains and vegetated swales. Crucially, the site drainage system will not outflow to the existing drainage network directly, but will discharge, via settlement ponds and vegetated swales, to numerous buffered overland outfalls which will promote percolation and vegetation filtration. The large number of these outfalls across the site are intended to keep volumes at each outfall low thus ensuring high filtration efficiency and low erosion rates. The following are mitigations specific to the ecology of watercourses:-

- The input of silt will be managed using a range of techniques integrated into the design of the Surface Water Management System including Altmuller and Dettmer settlement ponds, check dams, silt fences, vegetated swales and buffered overland outfalls;
- The input of nutrients, the main source being clear felling, will also be managed using aspects of the site drainage system, particularly the vegetated swales and the overland outflows. Clear felling, in line with current timber industry practices, is part of the current land usage and the proposed drainage design will improve outfall from this existing practice;
- The input of cement to watercourses will be mitigated onsite. Where concrete is delivered to the wind farm site, only the chute will be cleaned onsite. Chute cleaning water is to be isolated in temporary lined wash-out pits. No discharge of cement contaminated water to the construction phase drainage system or directly to any artificial drain or watercourse will be allowed;
- The input of hydrocarbons and other chemicals to watercourses will be mitigated against onsite. All plant will be inspected and certified to ensure they are leak free and in good working order prior to use on the wind farm site. On-site re-fuelling of machinery will be carried out using a mobile double skinned fuel bowser. The fuel bowser will be re-filled off site and will be towed/driven around the wind farm site to where machinery are located. Any chemical storage areas will be bunded appropriately for the fuel storage volume. An emergency plan for the construction phase to deal with accidental spillages will be contained within the CEMP. Spill kits will be available to deal with accidental spillages. In a worst-case scenario, if there is an incident onsite, the site drainage system does not discharge directly to any watercourse, thus insulating watercourses from such an event;
- Hydromorphological changes to watercourses, brought about by changes within the catchment, will be mitigated to a large extent by the use of settlement ponds and check dams to attenuate water, as well as vegetation swales and overland outfalls to promote percolation. As such, hydromorphological changes within watercourses are not expected as a result of the project;
- A Water Quality Monitoring Plan be put in place and will provide for an inspection and maintenance plan for the site drainage system. 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;
- Any excess build-up of silt levels at dams, the settlement ponds, or any other drainage features that may decrease the effectiveness of the drainage feature, will be removed. This will be given careful consideration by the ECoW. During the construction phase field testing, sampling and analysis of a range of parameters

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<sup>3</sup> Settlement ponds will be as described in Altmuller & Dettmer; a design element that has been proven to work, both in the short and long term, and have clearly demonstrated results in terms of habitat improvement and FPM population dynamics. They also provide excellent spawning and larval habitat for frogs and newts.

with relevant regulatory limits and EQs will be undertaken for each primary watercourse at the wind farm site. Monitoring shall be carried out following heavy rainfall events and during 95<sup>th</sup> percentile low flow rates (the flow which is surpassed 95% of the time) as this is the stage when pressures and threats are highest on aquatic biota;

- Stream crossings will primarily use box culverts for stream crossings 1, 2, 3 and 4, while a bottomless culvert is proposed for crossing 5. All small drains to be crossed within the site will be piped. The design and installation of these crossings will follow the guidelines set out in “*National Roads Authority National Roads Authority. (2005). Guidelines for the Crossing of Watercourses during the Construction of National Road Schemes*”:-
  - In terms of the box culverts, the key measure is that culverts should be installed so that the bottom (invert) is at least 500mm below the grade line of the natural stream bed and that the culvert should be ‘drowned out’<sup>4</sup>; this negates issues with fish passage. The open-bottom culvert is essentially a span bridge and the installation of it has no potential to cause fish passage issues. In terms of the piping of drains onsite, the pipes will be level, or close to level, and will be set below water level (drowned out) to ensure fish passage. In terms of ensuring water quality during the construction/installation of these stream crossings, each crossing will be site specific and the particulars will be agreed onsite between the engineers, the ECoW and IFI, however a number of basic principles will be used. Firstly, for the piped drain crossings, if sufficient depth of water is present in the drain, it may be best to drop the pipe into place and backfill. If excavation is required to get levels, it may be best to dam the drain with sandbags if flow is sufficiently low to permit this approach, or otherwise to dam the drain and overpump. Pipes in dry drains will be installed making sure to keep the slope at grade. For the culverts, a stretch of river will be electrofished before being dammed at both ends and overpumped; this will contain dirty water within the working cell while the excavation is taking place to attain the depth for the culvert. For the installation of the bottomless culvert it is likely that a temporary dam-and-flume will be put in place to allow for the infilling behind the abutments without water quality issues;
- All instream works will be carried out in the months of July, August and September to avoid the salmonid spawning season and to avoid the times when the young of the year are at their most vulnerable;
- In terms of directional drilling, the works, including launch and receiver pits, will be carried out outside 20m from each watercourse. This is the buffer zone width recommended by IFI. The drilling process shall be constantly monitored to detect any possible breakout or leaking of bentonite into the surrounding geology; this is gauged by observation and by monitoring pumping rates and pressures. Monitoring by an ecologist/environmental engineer will be required during directional drilling works. IFI and NPWS will be notified of the works in advance; and,
- In terms of crossing within the bridge deck, critical elements with respect to aquatic ecology include for the placement of a sealed silt fence at both sides of the bridge crossing point and to a minimum of 10m upstream and downstream of each crossing on both sides of the road to divert water and runoff from the road into silt traps at each corner of the road. The size and design

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<sup>4</sup> Meaning that meaning that the culvert sits well below low water levels rather than perched above it

of these silt traps will vary and be suited to local conditions. The silt traps and sealed silt fence will be installed prior to any construction works commencing at the bridge crossing. An ecologist/environmental engineer will again be monitoring for the duration of the works.

#### 4.3.5 Other Taxa

- Areas where soil or water is to be stored (e.g. settlement ponds) will be checked regularly throughout the construction phase for the presence of Frogs (and spawn) and other protected aquatic and semi-aquatic fauna. If protected species are present, the environmental staff will translocate these, if possible (under licence if applicable). The same measure will be applied for any drains or areas of standing water forded by construction machinery. These areas will be checked on an ongoing basis by the ECoW and any areas with breeding frogs, spawn or tadpoles will be mapped and if possible fenced off temporarily to allow Frogs to metamorphose. If such areas cannot be avoided by site traffic the environmental staff will translocate the frogs (adults/young) under licence if applicable;
- An updated survey for adult Marsh Fritillary, *Euphydras aurinia*, will be carried out in the year of construction (May/June) ideally before construction commences. Locations with Devils Bit Scabious within the site (along the edge of existing access tracks) will be checked in September/October for the presence of larval webs. Marsh Fritillary butterfly is the only Irish insect listed under Annex II of the EU Habitats Directive. In the event that larval webs are recorded within the works area, mitigation measures will follow best practice guidelines as outlined in the 'Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes' (NRA, 2008);
- If other taxa such as other species of Lepidoptera, Common Viviparous Lizard etc. are recorded within or adjacent to the wind farm, or the haul route works locations or grid connection route, these sightings will be logged on the wildlife register; and,
- Any sightings of rare or protected invertebrates, amphibians etc. made in the course of operational phase monitoring will be recorded and if appropriate this information will be submitted to the National Biodiversity Data Centre.

#### 4.4 Land & Soil

##### 4.4.1 Soil, Subsoil and Bedrock Excavation

The excavation of soil, subsoil and bedrock will have a direct effect on the geological environment and no specific mitigation measures are proposed. The excavation of materials will be completed in accordance with best practice for the management and treatment of such materials.

##### 4.4.2 Erosion of Exposed Soil and Subsoil at Excavation and Storage Areas

The following avoidance and design measures are proposed to reduce erosion effects at excavation and spoil storage areas:-

- Mats will be used, as necessary, to support construction plant and machinery on soft ground, thus reducing the likelihood of soil and subsoil erosion and avoiding the formation of rutted areas. This will substantially reduce the likelihood for surface water ponding to occur;
- Excavated soil will be side cast and stored temporarily adjacent to excavation areas for use during reinstatement and landscaping. Where material is not

required for reinstatement or landscaping, it shall be immediately transported to the spoil deposition areas;

- Silt fences, and all necessary surface water management measures (including upslope interceptor drains), will be installed around all temporary stockpiles to limit movement of entrained sediment in surface water runoff. All slopes will be sealed with the bucket of an excavator;
- In order to minimise erosion during the construction phase, works will not take place during periods of intense or prolonged rainfall (to prevent increased silt laden runoff). Drainage systems, as outlined in **Chapter 7**, will be implemented to limit runoff effects during the construction phase;
- At the designated spoil deposition areas, material will be placed in layers to ensure stability is maintained and works will be undertaken in accordance with best practice construction methodologies. Works at the spoil deposition areas will be monitored, on a weekly basis during the construction phase and monthly for a 6-month period thereafter, by an appropriately qualified Geotechnical Engineer. In the event that any ground stability issues arise, the Engineer will have the power to cease works until such time as remedial works have been completed to his/her satisfaction;
- Permanently mounded soils and subsoils; for example, berms surrounding turbines and hardstands, berms located along access tracks and at the spoil deposition areas; will be seeded and grassed over at the earliest opportunity to prevent erosion; and
- The electricity line (grid connection) trench will be reinstated to the required specification and in accordance with landowner requirements and will be reseeded or allowed to vegetate naturally (on agricultural land) or topped with tarmacadam (or similar along public roads) at the earliest opportunity to prevent erosion.

#### 4.4.3 Contamination of Soils and Subsoils by leakages, spillages of hydrocarbons or other chemicals

The following measures are proposed to specifically prevent contamination of soils and subsoils:-

- The volume of fuels or oils stored on site will be minimised. All fuel and oil will be stored in an appropriately bunded area within the temporary construction compound. Only an appropriate volume of fuel will be stored at any given time. The bunded area will be roofed to avoid the ingress of rainfall and will be fitted with a storm drainage system and an appropriate oil interceptor;
- All bunded areas will have 110% capacity of the volume to be stored;
- 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 at the temporary compound and will be towed around the site by a 4x4 jeep to where plant and machinery is located. The 4x4 jeep will also be fully stocked with 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 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 to avoid any accidental leakages;
- All plant and machinery used during construction will be regularly inspected for leaks and fitness for purpose;

- Spill kits will be available to deal with any accidental spillages within the temporary construction compound and during re-fuelling; and
- All waste tar material arising from road cuttings (from trenching in public roads and haul route upgrade works) will be removed off-site and disposed of at a licensed waste facility. Due to the potential for contamination of soils and subsoils, it is not proposed to utilise this material for any reinstatement works or to store it within the spoil deposition areas.

#### 4.4.4 Land and Land Use

15ha of forestry will be felled to accommodate wind farm infrastructure. However, all tree coverage felled will be replaced at a re-planting site(s) which will be subject to technical approval through a separate consenting process. No specific measures, other than best-practice felling and re-planting methodologies are proposed.

#### 4.5 Water

##### 4.5.1 Clear Felling & Surface Water Quality Effects

Best practice methods related to water incorporated into the forestry management and mitigation measures have been derived from:-

- Department of Agricultural, Food and the Marine (2019) *Standards for Felling and Reforestation*;
- Forestry Commission (2004) *Forests and Water Guidelines, Fourth Edition*. Publ. Forestry Commission, Edinburgh;
- Coillte (2009) *Forest Operations and Water Protection Guidelines*;
- Forest Services (Draft) *Forestry and Freshwater Pearl Mussel Requirements – Site Assessment and Mitigation Measures*;
- Coillte (2009) *Methodology for Clear Felling Harvesting Operations*; and,
- Forest Service (2000: *Forestry and Water Quality Guidelines*. Forest Service, DAF, Johnstown Castle Estate, Co. Wexford.

##### Mitigation by Avoidance

There is a requirement in the *Forest Service Code of Practice* and in the *FSC Certification Standard* for the installation of buffer zones adjacent to aquatic zones at planting stage. Minimum buffer zone widths recommended in the Forest Service (2000) guidance document *Forestry and Water Quality Guidelines* are detailed below.

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

During the construction phase, a self-imposed conservative buffer zone of 50m will be maintained for all streams.

The large distance between the majority of the felling areas and sensitive aquatic zones means that any poor quality runoff arising from felling areas can be adequately managed and attenuated prior to even reaching the aquatic buffer zone and primary drainage routes. Where tree felling is required in the vicinity of streams, the additional mitigation measures outlined below will be employed.

## Mitigation by Design

Mitigation measures which will reduce the risk of entrainment of suspended solids and nutrient release in surface watercourses comprise best practice methods, as follows:-

- Machine combinations (i.e. handheld or mechanical) will be chosen which are most suitable for ground conditions and which will minimise soils disturbance;
- Checking and maintenance of tracks and culverts will be ongoing through any felling operation. No tracking of vehicles through watercourses will occur. Where possible, existing drains will not be disturbed during felling works;
- Ditches which drain from the areas 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 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 spoil disposal areas. 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 50m buffer is required, it will be necessary to install double or triple sediment traps;
- All drainage channels will taper out before entering the 50m 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;
- Brush mats will be used to support vehicles on soft ground, reducing topsoil and mineral soils erosion and avoiding the formation of rutted areas, in which surface water ponding can occur. Brush mat renewal will take place before they become heavily used and worn. Provision will be made for brush mats along all off-road routes, to protect the soil from compaction and rutting. Where there is risk of severe erosion occurring, extraction will be suspended during periods of high rainfall;
- Timber will be stacked in dry areas, and outside the 50m watercourse buffer. Straw bales and check dams will 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/tracks and culverts will be ongoing through the felling operation;
- 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:

- 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;
- Trees will be cut manually from along streams and using machinery to extract whole trees; and
- Travel will only be permitted perpendicular to and away from surface water features.

### Silt Traps

Silt traps will be strategically placed down-gradient within forestry drains near streams. The main purpose of the silt traps and drain blocking is to slow water flow, increase residence time and allow settling of silt in a controlled manner.

### Drain Inspection and Maintenance

The following items will be carried out during pre-felling inspections and regularly thereafter:-

- Communication with tree felling operatives in advance to determine whether any areas have been reported where there is unusual waterlogging or bogging of machines;
- Inspection of all areas reported as having unusual ground conditions;
- Inspection of main drainage ditches and outfalls. During pre-felling inspections, the main drainage ditches will be identified. Where possible, the pre-felling inspection will be carried out during rainfall;
- Following tree felling, all main drains will be inspected to ensure that they are functioning;
- Extraction tracks within 10m of drains will be broken up and diversion channels created to ensure that water in the tracks spreads out over the adjoining ground;
- Culverts on drains exiting the site, if impeded by silt or debris, will be unblocked; and
- All accumulated silt will be removed from drains and culverts, and silt traps, and this removed material will be deposited away from watercourses to ensure that it will not be carried back into the trap or stream during subsequent rainfall.

### Surface Water Quality Monitoring

Sampling will be completed before, during (if the operation is conducted over a protracted time) and after the felling activity. The 'before' sampling will be conducted within 4-weeks of the felling activity commencing, preferably in medium-to-high water flow conditions. The 'during' sampling will be undertaken once a week or after rainfall events. The 'after' sampling will comprise as many samplings as necessary to demonstrate that water quality has returned to pre-activity status (i.e. where an impact has been shown).

Details of the proposed surface water quality monitoring programme are outlined in the Water Quality Monitoring Plan.

The surface water sampling locations used in this EIAR for the wind farm site (i.e. SW1 – SW2) will also be used as sampling locations during felling activities.

Also, daily surface water monitoring forms (for visual inspections and field chemistry measurements) will also be utilised at every works site near any watercourse. These will be taken daily and kept on site for record and inspection.

#### 4.5.2 Earthworks (Removal of Vegetation Cover, Excavations and Stock Piling) Resulting in Suspended Solids Entrainment in Surface Water

##### Mitigation by Avoidance

The key mitigation measure during the construction phase is the avoidance of sensitive aquatic areas by using a 50m buffer

Specific mitigation measures, incorporated into the design of the project and through implementation of best practice methodologies (discussed below) will be employed where work inside buffer zones is proposed.

The generally large setback distance from sensitive hydrological features ensures that sufficient space is provided for the installation of drainage mitigation measures (discussed below) and to ensure their effective operation. The proposed buffer zone will ensure:-

- Avoidance of physical damage to watercourses, and associated release of sediment;
- Avoidance of excavations within close proximity to surface water courses;
- Avoidance of the entry of suspended sediment from earthworks into watercourses; and,
- Avoidance of the entry of suspended sediment from the construction phase drainage system into watercourses, achieved in part by ending drain discharge outside the buffer zone and allowing percolation across the vegetation of the buffer zone.

##### Mitigation by Prevention

The following section details the measures which will be put in place during the construction phase to ensure that surface water features are protected from the release of silt or sediment and to ensure that all surface water runoff is fully treated and attenuated to avoid the discharge of dirty water.

Source controls to limit the likelihood for 'dirty water' to occur:-

- Interceptor drains, vee-drains, diversion drains, flume pipes, erosion and velocity control measures such as use of sand bags, oyster bags filled with clean washed gravel, filter fabrics, and other similar/equivalent or appropriate systems;
- Small working areas, covering stockpiles, weathering off stockpiles, cessation of works in certain areas or other similar/equivalent or appropriate measures.

In-Line controls to ensure appropriate management of silt laden water:-

- Interceptor drains, vee-drains, oversized swales, erosion and velocity control measures such as check dams, sand bags, oyster bags, straw bales, flow limiters, weirs, baffles, silt bags, silt fences, sedimats, filter fabrics, and collection sumps, temporary sumps/attenuation lagoons, sediment traps, pumping systems, settlement ponds, temporary pumping chambers, or other similar/equivalent or appropriate systems.

Treatment systems to fully attenuate silt laden waters prior to discharge:-

- Temporary sumps and attenuation ponds, temporary storage lagoons, sediment traps, and settlement ponds, and proprietary settlement systems such as Siltbuster, and/or other similar/equivalent or appropriate systems; and

- Final tertiary treatment lagoons which follow a design outlined by Altmüller and Dettmer (2006)<sup>5</sup>.

It should be noted for this site that an extensive network of land and forestry drains already exists and these will be integrated and enhanced as required and used within the wind farm drainage system. The integration of the existing land drainage network and the proposed wind farm network is common practice in wind energy developments and will also result in benefits to surrounding agricultural lands.

The main elements of interaction with existing drains will be as follows:-

- Apart from interceptor drains, which will convey clean runoff water to the downstream drainage system, there will be no direct discharge (without treatment for sediment reduction and attenuation for flow management) of runoff from the wind farm drainage into the existing site drainage network. This will reduce the likelihood of any increased risk of downstream flooding or sediment transport/erosion;
- Silt traps will be placed in the existing drains upstream of any streams where construction works is taking place, and these will be diverted into proposed interceptor drains, or culverted under/across the works area; and
- Buffered outfalls, which will be numerous over the site, will promote percolation of drainage waters across vegetation and close to the point at which the additional runoff is generated, rather than direct discharge to the existing drains of the site.

### Water Treatment Train

While the primary, secondary and tertiary silt/sediment ponds and lagoons are assessed as providing a sufficient level of protection to avoid any deterioration in downstream water quality; a final line of defence can be provided by a water treatment train such as a 'Siltbuster', if required. 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 water treatment train will apply for the entirety of the construction phase.

### Silt Fences

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 watercourses 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 of these structures during construction phase is critical to their functioning to stated purpose. They will remain in place throughout the entire construction phase. Double silt fences will be emplaced within drains down-gradient of all construction areas inside the hydrological buffer zones to provide an additional layer of protection in these areas.

### Silt Bags

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, most of the sediment is

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<sup>5</sup> Altmüller R. & Dettmer, R. (2006) *Successful species protection measures for the Freshwater Pearl Mussel (Margaritifera margaritifera) through the reduction of unnaturally high loading of silt and sand in running waters – Experiences within the scope of the Lutterproject.*

retained by the geotextile fabric allowing filtered water to pass through. Silt bags will be used with natural vegetation filters or sedimats (sediment entrapment mats, consisting of coir or jute matting) placed at the silt bag location to provide further treatment of the water outfall from the silt bag. Sedimats will be secured to the ground surface using stakes/pegs. The sedimat will extend to the full width of the outfall to ensure all water passes through this additional treatment measure.

### *Tertiary Treatment System/Lagoons*

In addition to the silt/settlement ponds, a tertiary treatment system will also be provided to remove any fine particles that may not settle in the primary and secondary settlement ponds. From the silt/settlement ponds, water will flow through lagoon which will be designed with a retention time of 10-days. These ponds; the design of which will be adapted to the characteristics of the project site but based on the principles of Altmuller & Dettmer (2006); will be vegetated so as to perform the role of a 'plant filtration bed'.

### *Management of Runoff from Soil Deposition Areas*

It is proposed that excavated overburden/spoil will be utilised for reinstatement of excavated areas etc. and for landscaping purposes. Excess material, or material which is unsuitable for this purpose, will be stored, permanently, at 2 no. dedicated spoil deposition areas and in the 3 no. spent borrow pits (if developed).

Both proposed spoil deposition areas and all borrow pits are located outside the 50m stream buffer zone.

During the initial placement of spoil in the deposition areas, silt fences, straw bales and biodegradable matting will be used to control surface water runoff. Drainage from overburden deposition areas will ultimately be routed to an oversized swale and a number of silt/settlement ponds (and lagoons) with appropriate storage and settlement capacity, designed for a '1-in-100 year 6-hour return' period, before being discharged.

Spoil deposition areas will be sealed with a digger bucket and vegetated as soon possible to reduce sediment entrainment in runoff. Once re-vegetated and stabilised, spoil deposition areas will no longer be a likely source of silt laden runoff. Surface water protection infrastructure will be left in place until the areas have stabilised.

### *Grid Connection Installation Works*

Temporary silt fencing/silt trap arrangements will be placed within existing roadside/field drainage features along the grid connection route to remove any suspended sediments from the works area. The trapped sediment will be removed and disposed of at an appropriate licenced facility. Any bare-ground will be re-seeded/reinstated immediately and silt fencing temporarily left in place if necessary.

### *Directional Drilling*

The following mitigation will be carried out during directional drilling works:-

- The works area will be clearly marked out with fencing or flagging tape to avoid unnecessary disturbance of vegetation;
- A minimum 10m buffer zone will be maintained between disturbed areas and the watercourse bank. There will be no storage of material/equipment, excavated material (see below) or overnight parking of machinery inside the 10m buffer zone;

- Double silt fencing will be placed upslope of the buffer zone on each side of the watercourse.
- Temporary storage of excavated material will be undertaken outside of the 10m buffer on flat ground or within a local hollow area. A containment berm will be placed downslope of the excavated material which in turn will be surrounded by secondary silt fence protection to prevent saturated soil from flowing back into the watercourse;
- Operation of machinery and use of equipment within the 10m buffer will be kept to a minimum to avoid any unnecessary disturbance;
- There will be no refuelling allowed within 100m of the watercourse crossing;
- All plant will be checked for purpose of use prior to mobilisation at the watercourse crossing; and
- Works shall not take place during periods of heavy rainfall and will be scaled back or suspended if heavy rain is forecasted.

Measures relating to the use of a mixture of a natural, inert and fully biodegradable drilling fluid such as Clear Bore™ and water for directional drilling include:-

- The area around the Clear Bore™ batching, pumping and recycling plants will be bunded using terram and sandbags in order to contain any spillages;
- One or more lines of silt fences will be placed between the works area and adjacent rivers and streams on both banks;
- Accidental spillage of fluids will be cleaned up immediately and transported off site for disposal at a licensed facility; and,
- Adequately sized skips will be used for temporary storage of drilling arisings during directional drilling works. This will ensure containment of drilling arisings and drilling flush.

#### *Pre-emptive Site Drainage Management*

The works programme for the initial construction stage of the development will also take account of weather forecasts, and predicted rainfall in particular. Large excavations and movements of soil/subsoil or vegetation stripping will be suspended or scaled back if prolonged or intense rain is forecast. The extent to which works will be scaled back or suspended will relate directly to the amount of rainfall forecast.

The following forecasting systems are available and will be used on a daily basis at the site to direct proposed construction activities:-

- General Forecasts: Available on a national, regional and county level from the Met Eireann website ([www.met.ie/forecasts](http://www.met.ie/forecasts)). These provide general information on weather patterns including rainfall, wind speed and direction but do not provide any quantitative rainfall estimates;
- Meteo Alarm: Alerts to the possible occurrence of severe weather for the next 2 days. Less useful than general forecasts as only available on a provincial scale;
- 3 hour Rainfall Maps: Forecast quantitative rainfall amounts for the next 3 hours but does not account for possible heavy localised events;
- Rainfall Radar Images: Images covering the entire country are freely available from the Met Eireann website ([www.met.ie/latest/rainfall\\_radar.asp](http://www.met.ie/latest/rainfall_radar.asp)). The images are a composite of radar data from Shannon and Dublin airports and give a picture of current rainfall extent and intensity. Images show a quantitative measure of recent rainfall. A 3 hour record is given and is updated every 15 minutes. Radar images are not predictive; and,

- Consultancy Service: Met Eireann provide a 24 hour telephone consultancy service. The forecaster will provide interpretation of weather data and give the best available forecast for the area of interest.

Using the safe threshold rainfall values will allow work to be safely controlled (from a water quality perspective) in the event of an impending high rainfall intensity event.

Works will be suspended if forecasting suggests either of the following is likely to occur:-

- >10 mm/hr (i.e. high intensity local rainfall events);
- >25 mm in a 24-hour period (heavy frontal rainfall lasting most of the day); or,
- >half monthly average rainfall in any 7 days.

Prior to works being suspended the following control measures will be completed:-

- Secure all open excavations;
- Provide temporary or emergency drainage to prevent back-up of surface runoff; and,
- Avoid working during heavy rainfall and for up to 24-hours after heavy events to ensure drainage systems are not overloaded.

#### *Timing of Site Construction Works*

The construction of the site drainage system will be carried out, at the respective locations, prior to other activities being commenced. The construction of the drainage system will only be carried out during periods of, where possible, no rainfall, therefore avoiding runoff. This will avoid the risk of entrainment of suspended sediment in surface water runoff, and transport via this pathway to surface watercourses. Construction of the drainage system during this period will also ensure that attenuation features associated with the drainage system will be in place and functional for all subsequent construction works.

#### *Monitoring*

Prior to the commencement of development, a detailed Site Drainage Plan and SWMP will be prepared to detail the siting and composition of the surface water management measures. The respective plans, which will form part of a detailed CEMP, will be prepared prior to the commencement of development.

The CEMP will also include a detailed Water Quality Monitoring Plan for the monitoring of surface waters in the vicinity of the construction site by a designated Environmental Manager. The monitoring programme will comprise field testing and laboratory analysis of a range of agreed parameters. The civil works contractor, who will be responsible for the construction of the site drainage system, and Environmental Manager will undertake regular inspections of the drainage system to ensure that all measures are functioning effectively. The surface water sampling locations used in this EIAR (i.e. SW1 – SW4) will be used during construction activities. 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.

Any excess build-up of silt levels that may decrease the effectiveness of the drainage feature, will be removed and disposed of in an appropriate manner.

#### *4.5.3 Excavation Dewatering and Effects on Surface Water Quality*

The management of excavation dewatering (pumping), particularly in relation to any accumulation of water in foundations or electricity line trenches, and subsequent treatment prior to discharge into the drainage network will be undertaken as follows:-

- Appropriate interceptor drainage, to prevent upslope surface runoff from entering excavations, will be put in place;
- The interceptor drainage will be discharged to the site constructed drainage system or onto natural vegetated surfaces and not directly to surface waters to ensure that Greenfield runoff rates are mimicked;
- If required, pumping of excavation inflows will prevent build-up of water in the excavation;
- The pumped water volumes will be discharged via volume and silt/sediment ponds and settlement lagoons adjacent to excavation areas, or via specialist treatment systems such as a Siltbuster unit;
- There will be no direct discharge to surface watercourses, and therefore no risk of hydraulic loading or contamination will occur;
- Daily monitoring of wind farm excavations by the Environmental Manager will occur during the construction phase. If high levels of seepage inflow occur, excavation work at this location will cease immediately and a geotechnical assessment undertaken; and,

A mobile 'Siltbuster' or similar equivalent specialist treatment system will be available on-site for emergencies. Siltbusters are mobile silt traps that can remove fine particles from water using a proven technology and hydraulic design in a rugged unit. The mobile units are specifically designed for use on construction-sites. They will be used as final line of defence if needed.

#### 4.5.4 Groundwater Levels and Local Well Supplies During Excavation Works

Mitigation measures with regard effects on groundwater levels and local well supplies will not be required for the reasons explained below.

The borrow pits at the wind farm site are located in bedrock (shales/sandstones) which is generally unproductive in terms of groundwater flow. No groundwater dewatering will be required as rock excavation will progress in a horizontal manner into the side of subcrop/shallow bedrock on the hill side.

The topographical and hydrogeological setting of the borrow pit locations means no significant groundwater dewatering will be required. Moreover, direct rainfall and surface water runoff will be the main inflows that will require water volume and water quality management. For the avoidance of doubt, dewatering is generally defined as a requirement to temporarily drawdown the local groundwater table by means of over pumping (for example, as would be required for the operation of a bedrock quarry in a valley floor). This example is very different in scale and operation from the development of a temporary shallow borrow pit such as that proposed, as follows:-

- The borrow pits are located at locally elevated areas where ground elevations are between 220m and 285m OD and the rock is shallow;
- These elevations are above the elevations of the local valleys and streams;
- The borrow pits will be between approximately 6m and 8m below ground level. In the context of the topographical/elevated/subcrop setting of the borrow pits, this depth range is relatively shallow;
- The local bedrock comprises shales/sandstones and is known to be generally unproductive. This means that groundwater flows will be relatively minor;
- The flow paths (i.e. the distance from the point of recharge to the point of discharge) in this type of geology is short, localised, and will also be relatively shallow;
- No regional groundwater flow regime (i.e. large volumes of groundwater flow) will be encountered at these elevations;

- Groundwater inflows will largely be fed by rainfall and by limited groundwater seepage from localised shallow bedrock; and
- The sloping nature of the wind farm site where the borrow pits are proposed along with the coverage of peaty topsoil means groundwater recharge will be low.

Consequently, the groundwater flow system will be small in comparison to the expected surface water flows from the ground surface. As a result, there will be a preference for surface water runoff as opposed to groundwater recharge and flow; and, accordingly, it is assessed that the management of surface water will form the largest proportion of water to be managed and treated.

In conclusion, therefore, it is assessed that the project will not impact in any way on any local groundwater wells/springs for the following reasons:-

- The site is underlain by low permeability bedrock;
- Groundwater flowpaths are therefore typically very short (30-300m);
- The majority of groundwater flows within the site emerge as springs/baseline along streams/rivers and leave the site as surface water flows and not groundwater flows; and
- The likelihood of effects on local wells (whether they are downslope or not) is very low as groundwater flowpaths between wind farm infrastructure and local wells typically do not exist due to the large setback distance (>450m).

Therefore, the risk of significant effects on local wells/water supply sources is very low.

#### Mitigation by Best Practice

Environmental management guidelines from the EPA guidance document *Environmental Management in the Extractive Industry* in relation to groundwater protection will be implemented during the construction phase, particularly the best practice measures relating to oil and fuels.

#### 4.5.5 Release of Hydrocarbons during Construction and Storage

Mitigation measures proposed to avoid release of hydrocarbons at the site are as follows:-

- The volume of fuels or oils stored on site will be minimised. All fuel and oil will be stored in an appropriately bunded area within the temporary construction compound. Only an appropriate volume of fuel will be stored at any given time. The bunded area will be roofed to avoid the ingress of rainfall and will be fitted with a storm drainage system and an appropriate oil interceptor;
- All bunded areas will have 110% capacity of the volume to be stored;
- On site refuelling 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 at the temporary compound and will be towed around the site by a 4x4 jeep to where plant and machinery is located. No refuelling will be permitted at works locations within the 50m hydrological buffer. The 4x4 jeep will also be fully stocked with 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 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 to avoid any accidental leakages;

- All plant and machinery used during construction will be regularly inspected for leaks and fitness for purpose;
- Spill kits will be readily available to deal with and accidental spillages; and
- All waste tar material arising from road cuttings (from trenching or other works in public roads) will be removed off-site and taken to a licensed waste facility. Due to the potential for contamination of soils and subsoils, it is not proposed to utilise this material for any reinstatement works.

#### 4.5.6 Groundwater and Surface Water Contamination from Wastewater Disposal

Measures to avoid contamination of ground and surface waters by wastewaters will comprise:-

- Self-contained port-a-loos (chemical toilets) with an integrated waste holding tank will be installed at the site compound, maintained by the providing contractor, and removed from site on completion of the construction works;
- Water supply for the site office and other sanitation will be brought to site and removed after use to be discharged at a suitable off-site treatment location; and,
- No water will be sourced on the site, nor will any wastewater be discharged to the site.

#### 4.5.7 Release of Cement-Based Products

The following mitigation measures are proposed to ensure that the release of cement-based products is avoided:-

- No batching of wet-cement products will occur on site. Ready-mixed concrete will be brought to site as required and, where possible, emplacement of pre-cast products, will take utilised;
- All watercourse crossings will utilise pre-cast products and the use of wet-cement products within the hydrological buffer will be avoided
- Where concrete is delivered on site, only the chute will be cleaned, using the smallest volume of water practicable. Chute cleaning will be undertaken at lined cement washout ponds with waters being stored in the temporary construction compound, removed off site and disposed of at an approved licensed facility. No discharge of cement contaminated waters to the construction phase drainage system or directly to any artificial drain or watercourse will be allowed;
- Weather forecasting will be used to ensure that prolonged or intense rainfall is not predicted during concrete pouring activities; and
- The concrete pour site will be kept free of standing water and plastic covers will be ready in case of sudden rainfall event.

#### 4.5.8 Morphological Changes to Surface Water Courses & Drainage Patterns

The following mitigation measures are proposed:-

- All proposed new stream crossings will be clear span bridges (bottomless culverts) and the stream beds will remain undisturbed. No in-stream excavation works at the crossing locations are proposed and therefore there will be no impact on the stream at the proposed crossing location;
- Where internal wind farm electrical cabling or grid connection cabling will pass above or below the existing culvert and will not directly interfere with the culvert;

- At the time of construction, all guidance/best practice requirements of the Office of Public Works (OPW) or Inland Fisheries Ireland will be incorporated into the design/construction of the proposed watercourse/culvert crossings;
- As a further precaution, in-stream construction work (if/where required) will only be carried out during the period permitted by Inland Fisheries Ireland for in-stream works according to *Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters* (2016) (i.e., July 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 (any deviation from this will be done in discussion with the IFI);
- During the near stream construction works (i.e. within the 50m buffer zone), double row silt fences will be emplaced immediately down-gradient of the construction area for the duration of the construction phase;
- The 5 no. new watercourse crossings at the wind farm site will require a Section 50 license application to the OPW in accordance with the Arterial Drainage Act 1945. The river/stream crossings will be designed in accordance with OPW guidelines/requirements on applying for a Section 50 consent; and,
- No instream works are proposed at the grid connection watercourse crossings.

#### 4.5.9 Hydrological Impacts on Designated Sites

The proposed mitigation measures for protection of surface water quality, which will include buffer zones and robust drainage control measures (i.e. interceptor drains, swales, silt/settlement ponds, settlement lagoons), will ensure that the quality of runoff from development areas will be very high. In particular, we refer to the inclusion of the tertiary sediment lagoons (as per Altmuller & Dettmer (2006)) which are recognised as providing a high level of protection against downstream water quality deterioration thus ensuring the protection of Freshwater Pearl Mussel and Nore Pearl Mussel within the River Barrow & River Nore SAC.

### 4.6 Air Quality & Climate

#### 4.6.1 Air Quality

In order to minimise dust emissions during construction, a series of mitigation measures have been prepared in the form of an outline Dust Management Plan. A detailed Dust Management Plan will be formulated prior to the construction phase of the project, and will include the following measures:-

- Access tracks and public roads in the vicinity of the site shall be regularly cleaned to remove mud, aggregates and debris and maintained as appropriate. All road sweepers shall be water assisted;
- Any road that has the potential to give rise to fugitive dust shall be regularly watered, as appropriate, during dry and/or windy conditions;
- Public roads in the vicinity of the site shall be regularly inspected for cleanliness and cleaned as necessary;
- In the event of dust nuisance occurring outside the site boundary, movement of materials will be immediately terminated and satisfactory procedures implemented to rectify the problem before the resumption of operations;
- If issues persist and the above measures are not satisfactorily control dust emissions, a wheel washing system with rumble grids to dislodge accumulated dust and mud prior to leaving the site should be installed;

- During movement of materials both on and off-site, trucks will be stringently covered with tarpaulin at all times. Before entrance onto public roads, trucks will be adequately inspected to ensure no potential for dust emissions;
- Material handling systems and site stockpiling of materials will be designed and laid out to minimise exposure to wind. Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods; and
- The Dust Management Plan shall be reviewed at regular intervals during the construction phase to ensure the effectiveness of the procedures in place and to maintain the goal of minimisation of dust through the use of best practice and procedures.

#### 4.6.2 Climate

At all times, these procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the site boundary, movements of materials likely to raise dust will be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations.

#### 4.7 Landscape

Aside from construction stage mitigation measures to minimise land and vegetation disturbance and dust emissions (which may reduce visual amenity), there are no specific mitigation measures to be implemented.

The appropriate management and reinstatement of excavations, in a timely manner, will ensure that any adverse effects caused, for example at site entrances or road upgrade locations, are minimised insofar as possible. Similarly, the progressive reinstatement and landscaping of the site will remediate any short term adverse effects on the local landscape.

Best practice construction methods including just in time delivery methods to prevent material waste, reuse of on-site materials, where possible; and the minimisation of fuel use, including generators, will reduce construction related climate emissions.

#### 4.8 Cultural Heritage

Archaeological, architectural and cultural heritage resources will be protected through the following mitigation and monitoring measures:-

- Post-consent pre-construction test trenching shall be carried out in the area of land take closest to RMP MO020-012 (ringfort) within the forestry re-plant lands. Test trenching will be carried out under licence to the Department of Housing, Local Government and Heritage and the National Museum of Ireland. Provision will be made for the full excavation and recording of any archaeological features or deposits that may be exposed during test trenching. Further recommendations, which may include preservation *in situ*, archaeological excavation or archaeological monitoring, may be made on completion of the test trenching programme;
- Archaeological monitoring of all excavations associated with the construction of the wind farm shall be carried out. Monitoring will be carried out under licence to the Department of Housing, Local Government and Heritage and the National Museum of Ireland. Provision will be made for the full excavation and recording of any archaeological features or deposits that may be exposed during monitoring;
- Archaeological monitoring of all excavations associated with the grid

connection infrastructure shall be carried out. Monitoring will be carried out under licence to the Department of Housing, Local Government and Heritage and the National Museum of Ireland. Provision will be made for the full excavation and recording of any archaeological features or deposits that may be exposed during monitoring;

- Archaeological monitoring of all excavations within the temporary access track between the N78 and L1834 shall be carried out. Monitoring will be carried out under licence to the Department of Housing, Local Government and Heritage and the National Museum of Ireland. Provision will be made for the full excavation and recording of any archaeological features or deposits that may be exposed during monitoring;
- Archaeological monitoring of all excavations at townland, parish, barony or county boundaries shall be carried out. Monitoring will be carried out under licence to the Department of Housing, Local Government and Heritage and the National Museum of Ireland. Provision will be made for the full excavation and recording of any archaeological features or deposits that may be exposed during monitoring;
- Written and photographic records will be created of any townland, parish, barony or county boundaries that may be impacted on. The written and photographic records will be created in advance of excavations commencing on site;
- A post-consent pre-construction Architectural Impact Assessment of Black Bridge, containing written, drawn and photographic records, shall be carried out by a suitably qualified historic building consultant/Conservation Architect; and

A post-consent pre-construction Architectural Impact Assessment of Crettyard Bridge, containing written, drawn and photographic records, shall be carried out by a suitably qualified historic building consultant/Conservation Architect.

#### 4.9 Noise & Vibration

The various contractors involved in the construction phase will be obliged, under contract, to take specific noise abatement measures and comply with the recommendations of *BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Noise*. The following list of measures will be implemented, as relevant, to ensure compliance with the relevant construction noise criteria:

- No plant or machinery will be permitted to cause a public nuisance due to noise;
- The best means practicable, including proper maintenance of plant, will be employed to minimise the noise produced by on site operations.
- All vehicles and mechanical plant will be fitted with effective exhaust silencers and maintained in good working order for the duration of the contract;
- Compressors will be attenuated 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;
- Machinery that is used intermittently will be shut down or throttled back to a minimum during periods when not in use;
- Any plant, such as generators or pumps, which may be required to operate outside of general construction hours will be surrounded by an acoustic enclosure or portable screen;
- During the course of the construction programme, supervision of the works will include ensuring compliance with the limits detailed in *BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites*

- Noise; and
- The hours of construction activity will be limited to avoid unsociable hours where possible. Construction operations, including the delivery of construction materials, shall generally be restricted to between 07:00hrs and 19:00hrs Monday to Friday and between 07:00hrs and 13:00hrs on Saturdays, with no operations on Sundays or public holidays. However, to ensure that optimal use is made of good weather periods, at occasional critical periods within the construction programme (i.e. concrete pours, turbine component deliveries and turbine erection) or in the event of an emergency; activities may be necessary outside out of these hours.

Based on assessment of the geological composition of the site undertaken to date, it is assessed that significant levels of rock are present. However, based on the site investigations undertaken, it is assessed that the extraction of rock will be undertaken by standard means of excavation and that rock breaking is unlikely to be required. If rock breaking is required, the following measures will be implemented, where necessary, to mitigate noise emissions:-

- Fit suitably designed muffler or sound reduction equipment to the rock breaking tool to reduce noise without impairing machine efficiency;
- Ensure all air lines are sealed;
- Use a dampened bit to eliminate a 'ringing' sound;
- Erect an acoustic screen between compressors or generators and noise sensitive area. When possible, line of sight between top of machine and reception point will be obscured; and
- Enclose the breaker or rock drill in portable or fixed acoustic enclosure with suitable ventilation.

The level of vibration from construction activities shall be limited to the values set out in the EIAR. It should be noted that these limits are not absolute but provide guidance as to magnitudes of vibration that are very unlikely to cause cosmetic damage. Magnitudes of vibration slightly greater than those in the table are normally unlikely to cause cosmetic damage, but construction work creating such magnitudes should proceed with caution. Where there is existing damage these limits may need to be reduced by up to 50%.

Given the substantial distances between locations where notable levels of vibration may take place (e.g. at turbine locations or extensive use of vibration rollers in access track construction) and the nearest NSLs, no likely significant effect will be experienced. Therefore, no specific mitigation measures are proposed in respect of vibration.

#### 4.10 Transport & Access

In order to ensure the avoidance of significant effects and reduce the predicted magnitude of effects to the greatest possible extent, a suite of mitigation measures are available which will reduce any likely effects during the construction phase. The following mitigation measures will be implemented:-

- Traffic movements will be limited to 07:00-19:00 Monday to Friday and 07:00–13:00 on Saturdays with no movements on Sundays or public holidays. It may be occasionally necessary to undertake works outside of these hours to avail of favourable weather conditions or during extended concrete pours. Where construction activities are necessary outside of the normal working hours, local residents and the Planning Authority will receive prior notification;

- A wheel washing facility will be provided, as necessary, to prevent any debris being transferred from site to the adjacent public roads. All drivers will be required to ensure that their vehicle is free from dirt and stones prior to departure from the project site. Where conditions exist for dust to become friable, techniques such as damping down of the affected areas will be employed and vehicles/loads will be covered to reduce dust emissions;
- A Traffic Management Plan shall be agreed as part of the CEMP with the Local Authority prior to the commencement of development. The Traffic Management Plan shall include *inter alia* confirmed details of construction material haul routes; confirmed details of vehicle specifications; a materials delivery programme; traffic management measures including details of 'Stop/Go' systems, signage, road closures and diversionary routes; and road reinstatement details;
- All works to the public road shall be undertaken in consultation with, and agreed in advance with, the relevant local authority;
- All reasonable steps shall be taken to ensure that only national and regional routes are used to transport all materials to the site, in so far as is possible;
- Prior to, and post, construction; pavement condition surveys will be undertaken along all non-national access routes proposed to be utilised in the delivery of construction materials. Given the high-quality and well-maintained nature of motorways and national routes, it is not assessed as necessary to carry out surveys of these carriageways or structures. Following the completion of the pre-construction survey, any works which are assessed as necessary to facilitate the delivery of components and materials to the project site shall be undertaken, while any deterioration of carriageways or structures identified in the post-construction survey shall be put right at the expense of the developer and to the satisfaction of the relevant local authority;
- Adequate signage shall be provided at entrances providing access, safety and warning information;
- Speed limit compliance; particularly along the L1834, L1835, L3037, L7117 and along the grid connection route; will be emphasised to all staff and contractors prior to the commencement of construction during site induction, and will be strictly enforced throughout the construction phase;
- Sufficient car parking spaces will be available at the temporary construction compound during the construction phase. Additionally, during construction of the grid connection, it is likely that agricultural premises will be used for the temporary storage of materials (e.g. ducting, cabling, etc.) and for the parking of construction plant, machinery, and work vehicles (cars, vans, etc.). No parking of cars by persons associated with the project will be permitted on any part of the public road that is not closed to traffic. All staff will be instructed to ensure that private entrances remain unobscured (particularly along the grid connection route);
- Road sweeping, particularly along the grid connection route, will be carried out as appropriate to ensure construction traffic does not adversely affect road conditions;
- Traffic restrictions shall be kept to minimum duration and extent;
- Appropriate traffic management; including maintenance of local access, pedestrian access (where safe to do so) and diversions (where required); shall be implemented to facilitate continued public use of roads where temporary traffic restrictions have to be put in place. Precise details of these measures will be detailed in the Traffic Management Plan to be agreed with the Planning Authority prior to the commencement of development;

- The timing of oversized/abnormal loads shall be agreed with the relevant local authorities and An Garda Síochána, and all relevant licenses and permits shall be obtained in advance. All oversized/abnormal loads shall be accompanied by escort vehicles to ensure the maintenance of public safety;
- Maximum axle loadings for abnormal/oversized loads shall be strictly enforced in accordance with the Road Traffic (Construction and Use of Vehicles) Regulations 2003 (S.I. No. 5 of 2003);
- A designated contact point and coordinator will be put in place to manage all access arrangements and to interface with the public and the respective local authorities;
- The site shall be closed, and strictly secured, to the public during the construction phase; and
- Prior to and post construction, pavement condition surveys will be undertaken along all non-national access routes proposed to be utilised in the delivery of construction materials. Following the completion of the pre-construction survey, any works (additional to those which have been identified and described at **Chapter 3**) which are assessed as necessary to facilitate the delivery of components and materials to the project site shall be undertaken. Subsequently, any deterioration of carriageways or structures identified in the post-construction survey shall be put right at the expense of the developer and to the satisfaction of the relevant local authority.

#### 4.11 Aviation

As requested by the IAA, a minimum of 30-days prior notification will be provided regarding the commencement of crane operations at the project site. As is best practice and implemented as standard, warning lights will be fitted to cranes during the erection of the wind turbines.

#### 4.12 Waste Management

The contractor shall ensure that all waste generated at the project site is managed in an appropriate manner. The precise methods to be implemented are detailed in the accompanying Waste Management Plan which shall ensure that waste is managed in accordance with all relevant legislation, best practice methods, and in accordance with the waste management priority hierarchy.

Excavated spoil material, which also constitutes 'waste', shall be managed in accordance with the provisions of the accompanying Spoil Management Plan. Only material which cannot be re-used for reinstatement or landscaping shall be removed from the project site and disposed of at an approved waste management facility.

### 5.0 Implementation of Environmental Management Measures

In the first instance, the construction phase of the project shall be undertaken in strict compliance with all measures set out in the EIAR and NIS; unless where revised or where required to be revised in order to ensure compliance which a condition of planning consent. All relevant conditions of consent shall be inserted at **Table 1** below.

Planning Conditions		
Condition No.	Content	Relevance to Construction Phase (Yes/No)


**Table 1: Planning Conditions**

This CEMP; which will be further developed prior to the commencement of construction; all associated documentation, construction management plans, and construction method statements shall be prepared to ensure strict accordance with each of the measures of the EIAR, NIS, and conditions of consent. As stated at **Section 1.4** above, it will be the responsibility of the EM to ensure coordination between this CEMP, all associated construction management plans & method statements, and the requirements set out in relation to the project.

**6.0 Communication Plan**

Given the multitude of stakeholders to be involved in the construction phase of the project, a clear and concise communications plan will be implemented to ensure that all matters arising are appropriately reported and recorded. The Communications Plan, which will be developed by the contractor will include a reporting strategy including, but not limited to, the following personnel:-

- White Hill Wind Limited Project Manager;
- Contractor Project Manager;
- White Hill Wind Limited Project Supervisor Construction Phase (PSCS);
- Contractor Site Foreman;
- Environmental Manager;
- Ecological Clerk of Works;
- Geotechnical Clerk of Works; and
- Archaeological Clerk of Works.

Additionally, White Hill Wind Limited shall appoint a dedicated Community Liaison Officer (CLO) who shall be responsible for engaging with members of the local community regarding the provision of project updates, etc., and shall also be responsible for relaying any matters raised to the project team.

A list of project contacts, to be developed prior to the commencement of construction and included within the detailed CEMP, shall be made available to all construction staff while a copy shall also be provided at the site offices.

**7.0 Staff Training & Environmental Awareness**

Only staff who have received appropriate training and have the necessary safety training/certification shall be permitted on-site.

All construction phase personnel will receive environmental awareness information as part of their initial site induction. The extent of their induction shall be tailored to the scope of their work; however, as a minimum, all environmental protection matters will be addressed in full. This will ensure that staff are familiar with environmental obligations associated with the construction process and the procedures and measures to be implemented. Staff will also be advised of the likely effects of any non-compliance with the relevant environmental measure.

As described at **Section 1.4**, the EM shall provide regular environmental updates to personnel and shall advise of any improvements which can be implemented.

Tool box talks will be held by the EM, or other relevant personnel 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 will be identified and discussed. Additionally, any non-compliance with a measures in this CEMP will also be discussed with the aim of avoiding a re-occurrence of the same non-compliance.

## 8.0 Emergency Response Procedures

Prior to the commencement of construction, the contractor shall prepare a comprehensive emergency response procedure to be implemented by on-site personnel. This on-site procedure shall be incorporated within the Environmental & Emergency Response Plan to ensure that appropriate procedures are in place to manage any incident and report same to the relevant stakeholders.

## 9.0 Recording & Reporting

Over the course of the construction phase, a significant volume of reporting will be undertaken to record the activities, methodologies, and measures implemented during the construction phase. With regards to environmental recording, the following is a non-exhaustive list of reports/records which are likely to be appended to the CEMP as the construction phase progresses:-

- Site Sign-In Records;
- Weekly Environmental Reports;
- Monthly Environmental Reports;
- Site Visual Inspection Checklists;
- Environmental Audits;
- Ecological Survey Reports;
- Water Quality Monitoring Reports;
- Archaeological Monitoring Reports;
- Geotechnical Monitoring Reports;
- Traffic Management Plans;
- Waste management documentation;
- All relevant licences, consents, and permits;
- All correspondence (internal and external) regarding environmental matters; and
- Staff Training Records.

## 10.0 Compliance & Review Procedures

### 10.1 Site Inspections & Environmental Audits

Routine inspections of construction activities will be carried out on a daily and weekly basis by the Contractor Project Manager, PSCS, Contractor Site Foreman, EM, and ECoW to ensure all environmental controls, relevant to the construction activities taking place at the time, are in place. Environmental inspections will ensure that the works are undertaken in accordance with this CEMP and all other relevant documentation.

### 10.2 Auditing

The contractor will be responsible for ensuring that all construction staff are aware of the requirement to, and understand the importance of, strictly implementing the procedures of the CEMP. Environmental audits will be undertaken during the construction phase of the project. In contrast to monitoring and inspection activities,

audits are designed to identify the underlying causes of non-compliances, and not to merely detect the non-compliance itself.

Moreover, audits are the means by which system and performance improvement opportunities may be identified. Environmental audits will be carried out by the contractor or by external personnel acting on their behalf. The impartiality and objectivity of the audit process is crucial in the identification of improvements to the activities being undertaken at the project site. Environmental audits will be scheduled and conducted at regular intervals to determine whether the CEMP is being appropriately implemented. The findings of the audits will be provided to the White Hill Wind Limited Project Manager, Contractor project Manager, PSCS, EM, and ECoW.

A sample Environmental Audit is included within the accompanying Environmental & Emergency Response Plan.

### 10.3 Environmental Compliance

As has been set out in the preceding sections, construction activities will be continuously and rigorously assessed to ensure that works are undertaken in accordance with the provisions of the detailed CEMP (to be prepared prior to construction). Where an environmental 'event/occurrence' has been identified, the following definitions shall apply:-

- Near-Miss: An event which has not resulted in an adverse environmental effect but which, if not addressed, could re-occur and result in adverse effects;
- Incident: An event which has occurred and which, if un-controlled, could result in substantial effects; however, on-site measures/procedures avoided such effects;
- Exceedance Event: Where an event has resulted in identifiable adverse effects which exceed the appropriate limit value (e.g. a deterioration of downstream water quality below acceptable limits). An exceedance event usually triggers the cessation of particular activities until an investigation has been completed and additional measures implemented; and
- Non-Compliance: The identification of an un-agreed deviation from prescribed procedures/measures set out in this CEMP.

### 10.4 Corrective Actions

A corrective action relates to the implementation of revised measures/procedures to rectify an identified environmental matter/concern/issue. Corrective actions will be implemented by the Contractor Project Manager, as advised by the PSCS and EM,

Corrective actions may be required as a consequence of:-

- Environmental Audits;
- Environmental Inspections; Environmental Monitoring;
- Environmental Incidents; and,
- Environmental Complaints.

A Corrective Action Notice will be used to communicate the details of the action required. A Corrective Action Notice will describe the cause and effect of the environmental issue/concern and will detail the recommended corrective action to be implemented.

If an environmental matter/concern/issue arises which requires immediate intervention; direct communications between the Contractor Project Manager, PSCS

and EM will be conducted. A Corrective Action Notice will be completed subsequently.

**Annex 1 –  
Environmental & Emergency Response Plan**





White Hill Wind Farm

# Planning-Stage Construction & Environmental Management Plan

## Environmental & Emergency Response Plan

White Hill Wind Limited

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## 1.0 Introduction

Galetech Energy Services (GES), on behalf of White Hill Wind Limited, has prepared this Environmental and Emergency Response Plan (EERP) which should be instigated if an emergency or environmental incident occurs either within the project site or elsewhere linked to the construction of the White Hill Wind Farm.

### 1.1 Purpose of this Report

Many construction and industrial sites have the potential to cause environmental harm which could pose threat to public health, water supplies and wildlife in the event of an environmental incident. The purpose of this report is to outline how, in the event of an emergency, impacts on humans and the local environment can be limited through quick action.

This EERP forms part of the pre-commencement requirement for the works and outlines conditions of work for staff, and for every contractor or sub-contractor at the site.

This document is a live document which will be updated regularly and forms part of the Planning-Stage Construction Environmental Management Plan (CEMP) for the White Hill Wind Farm. Consequently, the majority of specific details can only be provided prior to the commencement of construction activities.

It contains details of:-

- Who should be contacted in an emergency;
- Procedures to be followed in an emergency; and
- Staff responsibilities in an emergency.

### 1.2 Environmental Incident

This EERP should be implemented once there has been an emergency or environmental incident on site or elsewhere linked to the construction of the White Hill Wind Farm. Incidents can be a discharge to air, land or water that could cause environmental damage. Causes of environmental incidents on site include:-

- Land Slide;
- Vandalism;
- Fire;
- Leaking plant or equipment;
- Containment Failure;
- Overfilling of containment vessels;
- Discharge of raw or partially treated effluent;
- Wind-blown waste, litter or dust;
- Flooding on site;
- Leaking Portaloo;
- Fuel drips or spills during refuelling;
- Leak from fuel or chemical containers;
- Failure of pumps and pipelines; and
- Contaminated water or sediment/silt entering a waster course or drain.

Any of these incidents could affect drainage systems, surface waters, ecosystems, groundwater and soil. The production of toxic fumes and airborne pollutants could affect air quality which may damage human health, wild and domestic animals and ecosystems.

### 1.3 Reference Documents

The production of this EERP has been supported by current legislation and will be accounted for in the further development of the appointed contractor's detailed CEMP.

Other guidance documents have been used to develop this EERP; including a Planning-Stage Construction & Environmental Management Plan, Spoil Management Plan, Surface Water Management Plan, and Water Quality Management Plan.

## 2.0 Requirements of an EERP

This EERP provides guidance for environmental incidents and includes:-

- Summaries of local environmental sensitivities;
- An outline of the construction works and sources to relevant existing environmental plans;
- Key mapping reference points for the site;
- Contact information for key external bodies and emergency response numbers who will assist in the event of an emergency;
- An identification of key staff and 24-hour contact details for those who will assist in the event of an emergency;
- An identification of Inventory of Pollution Prevention Equipment;
- Details of an Inventory of Chemical Products and Waste Inventory on Site\*;
- Details of reporting requirements;
- Details of staff who are trained in the use of spill kits and booms etc.;
- Procedures to be followed in the event of an emergency and an identification of those responsible for re-positioning and moving the plant; and
- A widely available summary sheet for operatives that outlines the key procedures in the event of an emergency.

## 3.0 Description of the Project

White Hill Wind Limited intend to construct the White Hill Wind Farm which will consist of:-

- 7 no. wind turbines with an overall tip height of 185m, and all associated ancillary infrastructure;
- Upgrades to the turbine component haul route; and
- Construction of an electricity substation and installation of c. 15km of underground grid connection cable between the White Hill Wind Farm and the existing Kilkenny 110kV electricity substation; and
- All associated and ancillary site development, excavation, construction, landscaping and reinstatement works, including provision of site drainage infrastructure.

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. Forestry replant lands are located within County Monaghan; while candidate quarries which may supply construction materials are also located within counties Carlow and Kilkenny.

As well as the reference documents listed in **Section 1.3**, various environmental reports have been prepared for the development including:-

- Environmental Impact Assessment Report (Galetech Energy Services);
- Population & Human Health Chapter (Galetech Energy Services);

- Biodiversity Chapter (Ecology Ireland);
- Land & Soil Chapter (Hydro Environmental Services);
- Water Chapter (Hydro Environmental Services);
- Material Assets [Transport & Access] (Galetech Energy Services); and
- Natura Impact Statement (Ecology Ireland).

#### 4.0 Incident and Hazard Reporting

To ensure that all environmental incidents or hazards are accurately recorded, a reporting system has been developed. The logging of environmental incident reports will ensure that regular revisions and reviews can be made. In the event of an accident/incident, a blank environmental incident report has been attached on the last page of this report that includes details of all non-compliance and corrective actions carried out as a result of any incidents.

#### 5.0 Waste Disposal after Environmental Incidences

In the event of a pollution incident where a spill kit etc. may be used, operatives must dispose of the used equipment by placing them into a sealed bag or container. Used equipment will then be removed from site by a licensed waste contractor to a licensed waste facility.

#### 6.0 Site Induction and Toolbox Talks

It is crucial that all contractors, sub-contractors and staff on site are fully familiar with this EERP. Toolbox talks will be regularly given to the workforce on the aspects of health and safety of this project and, during these talks, they will receive regular reminders of the importance of not only the local environment but of the necessary environmental controls that are in place on site.

#### 7.0 Summary Sheet for Machinery & Plant Operators

This summary sheet is for all site personnel. A laminated copy will be kept on all site vehicles/machinery.

##### 7.1 Procedures for an Incident

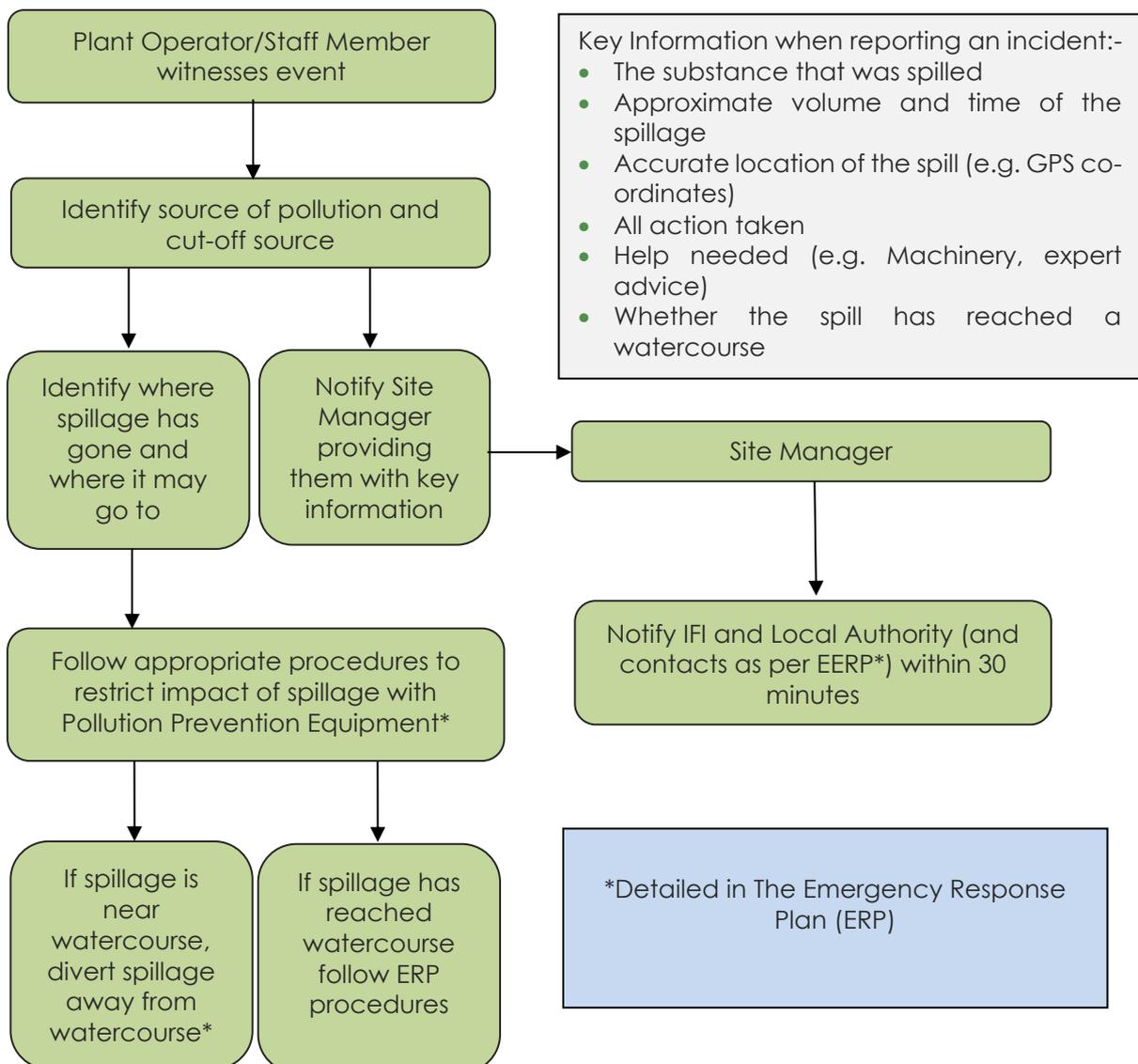
The following procedures are a guide when dealing with incidents. To ensure health and safety for yourself and others, this health and safety guidance should be followed at all times alongside applying common sense:-

1. Identify the source of the spillage and cut off source if possible through closing a valve or righting container etc.;
2. Discontinue all work on site and all operatives will assist in placing spill mats correctly on affected area. Immediately contact Site Manager/ main contact;
3. Identify the spillage route. If spillage is in close proximity to a watercourse (drainage/ditch/river), divert spillage away from the watercourse through the use of absorbent materials from the spill kit;
4. If a watercourse is at risk of contamination from suspended solids from a slope failure, do the following:-
  - a. Place straws bales wrapped in geotextile or sand/gravel bags with geotextile curtains immediately in the watercourse(s) at regular intervals downstream from the incident. These sand/straw bags and bales will be removed and replaced with stone filters once water quality is stabilized;
  - b. Stone check dams faced with a layer of geotextile will be constructed at critical points along the watercourse; and
  - c. Small sumps will be formed intermittently between the check dams to reduce the amount of suspended solids contained in the water;

5. If there has been an Oil spill in the watercourse, do the following:-
  - a. Place flexible absorbent booms across the watercourse, ahead of the contamination within a quiet stretch of water;
  - b. Place absorbent cushions in the water immediately upstream of these booms as well as downstream of the booms; and
  - c. Remove and replace saturated absorbent material as required. Please ensure removed cushions are placed in sealed polythene bags/containers and disposed of by the principal waste contractor;
6. Notify all parties in the order listed overleaf. Notification should be made by one member of staff whilst remaining staff present deal with the spill;
7. Dig up all contaminated ground as soon as possible. All contaminated materials should be placed in sealed polythene bags/containers and disposed of appropriately by a licensed waste contractor; and
8. Complete required record of incident and response into reporting system.

### 8.0 Communication Plan

A detailed Communication Plan will be provided by the Contactor, in liaison with relevant stakeholders, and will be included in the updated EERP prior to the commencement of construction. An outline Communication Plan is set out below.



## 8.1 Environmental Response Plan for White Hill Wind Farm

<b>Incident Response Plan for White Hill Wind Farm</b> Based on template provided in GPP 21 – Guidance for Pollution Prevention	
<b>Site Address:</b> Ridge (Ridge E.D.), Knocknabranagh and Knockbaun, and Baunreagh, Co. Carlow; and Coolcullen, Co. Kilkenny  <b>Official Company Address:</b> White Hill Wind Limited, Greaghcrotagh, Tullyco, Cootehill, Co. Cavan  <b>Key Holders for site (Name and Contact numbers):</b>	<b>Coordinates:</b>  <b>Map references:</b>
<b>Overview of the activities on site:</b> <b>Include number of employees at different times of the day:</b>  Daylight hours:  Dusk to Dawn  Weekend Dusk to Dawn:  Bank Holidays:	
<b>Description of surrounding area:</b>	
<b>Date and Version of the plan:</b>	<b>Name &amp; position of person responsible for compiling/approving the plan:</b>
<b>Review date:</b>	<b>Date of next exercise:</b>
<b>Objectives of the plan:</b>	
<b>List of external organisations consulted in the preparation of this plan with contact details:</b>	
<b>Distribution list of who has received this plan and which version:</b> <i>Please note that it is recommended that you review and revise this plan regularly</i>	

## 8.2 External Contacts

External Contacts		
Contact	Office Hours	Out of Office
Emergency Services (Fire/Police/Ambulance)	999 or 112	999 or 112
Local Garda Station	Leighlinbridge: 059 9721122	
Local Hospital: St. Luke's General Hospital	056 7785000	
Environment Section Carlow County Council County Buildings Athy Road Carlow	059 913 6231	
Environment Section Kilkenny County Council County Hall John Street Kilkenny	056 779 4470	
EPA Regional Inspectorate Seville Lodge Callan Road Kilkenny	056 779 6700	
Inland Fisheries Ireland	01 8842600	1890 347 424 (24 hours)
ESB	01 8529534	
Telecommunications – Eircom/Eir	1800 475475	

## 8.3 Internal Contacts

Internal Contacts		
Names and position of staff authorised and trainers to activate and co-ordinate the plan. Staff to be contacted if needed to move or evacuate the site		
Other Staff:		
Managing Director		
Site Manager		
Environmental Manager		



### 8.6 Site Environmental Incident Report Form

Site:		Date:	
Time:		Weather:	
Report By:		Position:	
White Hill Wind Farm personnel present:		Position:	
Contractor personnel present:		Position:	

Description of Incident:
--------------------------

Item Spilled:	
Estimate of Volume of Spillage:	

List of actions followed once incident was noted	Time:	Corrective Action	
		Action:	By:
Who first observed incident?			
First action			
Next action			
Time Pollution Hotline was contacted			
Other			

<b>Details of Clean-Up contractor or how contamination was removed from site:</b>	
Details of how this could be avoided in future:	
Details of review of internal procedures as result of this incident:	

Date of Report Completion: \_\_\_\_\_

Item	Questions	Yes	No	Corrective Action Action: By:	
1. Miscellaneous					
1.01	Does the contractor carry out regular internal environment audits on the site? Are recommendations recorded and is corrective action monitored?				
1.02	Have any environment incidents occurred and have these been reported as per on site procedure?				
1.03	Does the site induction contain a section on environmental requirements, including spill procedures, and is this communicated effectively?				
2. Land					
2.01	Are areas of hard standing (excluding bunded and refuelling areas) appropriately drained?				
2.02	Have local roads been inspected and cleaned where necessary?				
2.03	Has all test pitting and soil stripping been monitored by an archaeologist?				
2.04	Have all site clearance works been checked by an ecologist prior to works?				
3. Materials and Equipment					
3.01	Is there knowledge of the IFI Guidelines on protection of Fisheries During Construction Works in and Adjacent to Waters (2016) and OPW Environmental Guidance: Drainage Maintenance & Construction (2019)				
3.02	Are transformers/generators located in secondary containment bunds?				
3.03	Are all bunds capable of containing 110% of the				

	volume of the largest container?				
3.04	Is refuelling carried out in a designated refuelling bay?				
3.05	Does all site drainage on hard standing drain to an oil interceptor?				
3.06	Is the designated area for oil, fuel and chemical storage appropriately sited (i.e. on hard standing at least 10m from a watercourse)?				
3.07	Are there procedures in place to monitor bund integrity and manage bund rainwater levels? Are these followed and recorded?				
3.08	Is there awareness that oil or residue from contaminated water removed from bunds should be disposed of as special waste and not discharged to land or the water environment? (oil absorbent materials (pads etc.) should be used first)				
3.09	Are all drums and mobile plant (e.g. generators) placed on drip tray more than 10m from any watercourse?				
3.10	Is all plant maintained in a good state of leaks? Are there records of this?				
3.11	Are there adequate spill kits available and stored in close proximity to potential risks?				
3.12	Are all refuelling browsers double skinned, locked when not in use, and in a good state of repair?				
3.13	Is there evidence of unmanaged/unrecorded fuel/oil spillages on site?				

3.14	Are dry or wet wheel washing facilities fully operational and effective?				
3.15	If wet wheel washing facilities are required, are these closed systems with no discharge to the water environment?				
3.16	Are there laboratory certificates (accredited by the Irish National Accreditation Board) to confirm that imported material stone aggregate brought onto site is free from any contamination?				
4. Noise, Dust & Light					
4.01	Are there facilities to dampen stockpiles and site working areas/roads to suppress dust?				
4.02	Are vehicles carrying loose material sheeted at all times?				
4.03	Are construction works, or deliveries of materials to and from the department, audible at noise sensitive premises?				
4.04	Has all external construction lighting received the approval of the planning authority?				
5. Waste					
5.01	Is the site tidy and free from litter?				
5.02	Is there evidence of waste beyond the site boundary?				
5.03	Is waste segregated and kept securely in containers in clearly designated areas?				
5.04	Does all waste leaving the site have the appropriate duty of care paperwork?				
5.05	Is all waste leaving the site being taken to an appropriately licensed site?				

5.06	Does all special/hazardous waste (e.g. oil contaminated soils, waste oil) have the appropriate Special Waste Consignment Note?				
5.07	Is material re-used/recycled on site where possible?				
5.08	Are waste management practices in line with the site waste management plan?				
5.09	Are relevant Waste Management Exemptions in place for use of waste on site (e.g. use of waste concrete to create foundation sub-base)?				
5.10	Is there any evidence of burning on site?				
5.11	Is there any evidence of unlicensed burial of waste?				
6. Water					
6.01	Do all discharges to land or watercourses have appropriate authorization from Local Authorities/IFI?				
6.02	Do all watercourses engineering (bank protection, crossing etc.) have the appropriate authorization from Local Authorities/ IFI?				
6.03	Do any abstractions from a watercourse or groundwater body have the appropriate authorization from Local Authorities/ IFI?				
6.04	Has confirmation for the SUDS design for access roads been gained from Local Authorities/ IFI?				
6.05	Are cut-off ditches installed on the uphill side of the working area to avoid contaminated surface water run-off?				
6.06	Has vegetation removal/clearance of the site been minimized to				

	avoid unnecessary areas of bare-ground?				
6.07	Is adequate treatment (e.g. settlement tank/lagoons/discharge to land) provided to prevent silt contaminated water entering watercourses and groundwater?				
6.08	Has vegetation removal/clearance of the site been minimized to avoid unnecessary areas of bare-ground?				
6.09	Have buffer-strips been left between working area and watercourses?				
6.10	Is plant operating in the watercourse?				
6.11	Have all culverts been installed at the base of stockpiles situated within close proximity to watercourses?				
6.12	Have silt fences been installed at the base of stockpiles situated within close proximity to watercourses?				
6.13	Are there adequate controls on site construction roads to minimize sediment runoff into watercourses (in particular, are the adequate flow attention measures within surface drain?)				
6.14	Are there any sign of decaying straw bales in watercourses? (this could lead to organic pollution of the watercourse)				
6.15	Are silt traps regularly maintained?				
6.16	Has ease of maintenance been considered in the design of permanent drainage features?				
6.17	Is there evidence of contamination of any watercourse (e.g. with oil,				

	sediment, concrete, waste) in the vicinity of the works?				
6.18	Is monitoring of potential impacts on watercourses carried out on a regular basis and fully recorded?				
6.19	Are dewatering operations being carried out in such a way to minimize sediment contamination?				
6.20	Is drainage and run off in concrete batching areas adequate?				
6.21	Are adequate pollution prevention measures considered and put in place during concrete pours?				
7. Landscape					
7.01	Have earthworks been designed to promote successful re-instatement of vegetation?				
7.02	Are reinstatement and restoration works being implemented in a timely manner as per the requirements of the Contract?				
8. Ecology					
8.01	Have storage sites (soil, plant etc.) been sited on areas of lower quality habitat where possible?				
8.02	Have buffer zones been constructed and maintained around designated protected species exclusion areas (e.g. red squirrel dreys, water vole habitats, otter holts, badger holts etc.)?				
8.03	Have toolbox talks on the subject of ecology and environmental responsibilities on site been delivered? Have attendance records been maintained for these?				
9. Documentation Check					

9.01	Start-up meeting record				
9.02	Full contacts list in CEMP				
9.03	Induction records				
9.04	Pollution Prevention Measures Register				
9.05	Geotechnical Risk Register				
9.06	Weekly meeting minutes				
9.07	Records of environmental checks and routine monitoring of mitigation measures				
9.08	Water Quality Monitoring Results				
9.09	Safety and Environmental Awareness Reports (SEARs). Filed and entered in database?				
9.10	Safety and Environmental Audit Reports for the site. (If yes, insert date of last audit)				
9.11	Contractor's Environmental Plans (or Construction Method Statements)				

**Annex 2 –  
Waste Management Plan**





White Hill Wind Farm

Planning-Stage Construction  
& Environmental  
Management Plan

Waste Management Plan

White Hill Wind Limited

Galetech Energy Services  
Clondargan, Stradone, Co. Cavan Ireland  
Telephone +353 49 555 5050  
[www.galetechenergy.com](http://www.galetechenergy.com)



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## 1.0 Introduction

Galetech Energy Services (GES), on behalf of White Hill Wind Limited, has prepared this Waste Management Plan (WMP) to detail the measures to be implemented for the control, management and monitoring of waste associated with the White Hill Wind Farm.

### 1.1 Purpose of this Report

The objective of this WMP is to minimise the quantity of waste generated by construction activities, to maximise the use of materials in an efficient manner and to maximise the segregation of construction waste materials on-site to produce uncontaminated waste streams for off-site recycling.

The WMP shall be implemented throughout the construction phase of the development to ensure:-

- That all site activities are effectively managed to minimise the generation of waste and to maximise the opportunities for on-site reuse and recycling of waste materials;
- To ensure that all waste materials are segregated into different waste fractions and stored on-site in a managed and dedicated waste storage area; and
- To ensure that all waste materials generated by site activities are removed from site by appropriately permitted waste haulage contractors and that all wastes are disposed of at approved waste licensed / permitted facilities in compliance with the Waste Management Act 1996 and all associated waste management regulations.

### 1.2 Scope & Requirements

This WMP forms part of the pre-commencement requirement for the works and outlines conditions of work for staff, and for every contractor or sub-contractor at the site. The contractor will continually oversee changes to this document and will work alongside the Environmental Manager (EM) prior to any work commencing.

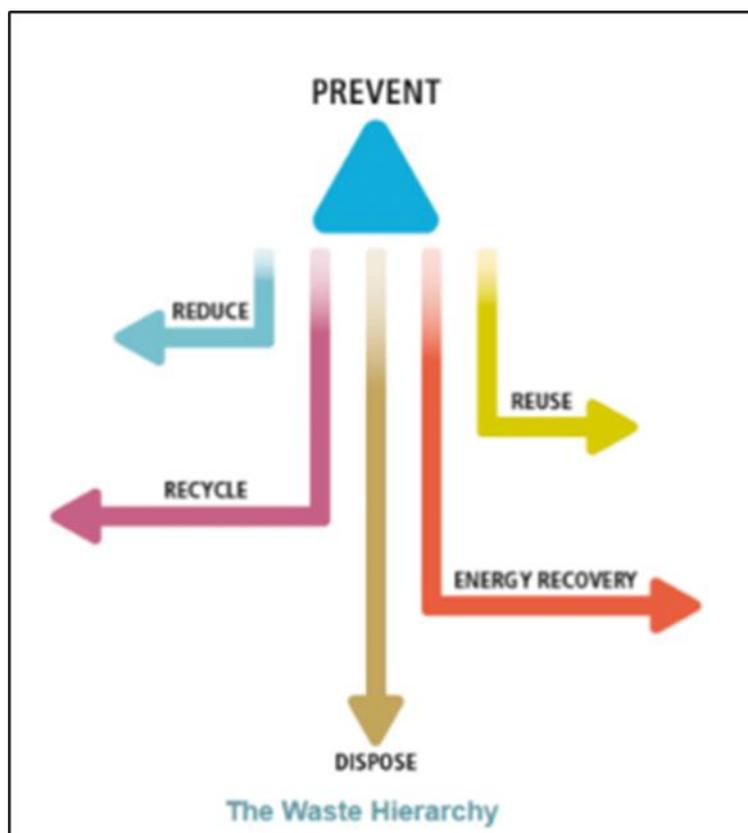
This document is a live document which will be updated regularly and forms part of the Planning-Stage Construction Environmental Management Plan (CEMP) for the White Hill Wind Farm. Consequently, the majority of specific details can only be provided prior to the commencement of construction activities.

### 1.3 Waste Policies & Legislation

The Department of the Communications, Climate Action & Environment published A *Waste Action Plan for a Circular Economy – Ireland's National Waste Policy 2020-2025* in 2020. One of its guiding principles is to minimise waste and, therefore, it is key that the contractor has an efficient waste management plan in place.

The European Union (Waste Directive) (Amendment) Regulations 2016 infer a duty on all waste producers to take measures to apply the waste hierarchy priority order. In these Regulations, the "Act of 1996" means the Waste Management Act 1996 (No. 10 of 1996) and "Principal Regulations" means the European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011). The "Waste Directive" means Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste.

The Waste Management Priority Hierarchy, which contractors are obligated to apply, is as follows:-



**Figure 1: Waste Management Hierarchy**

The waste management hierarchy shown above applies to all waste, including hazardous waste. The diagram conveys that above all, the prevention of waste production is the top priority.

The PCB/PCT Directive (Directive 96/59/ EC on the disposal of polychlorinated biphenyls and polychlorinated terphenyls) deals with the disposal of certain hazardous chemicals that represent a particular threat to the environment and to human health.

The European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) (Amendment) (No. 2) Regulations 2017 (S.I No. 282 of 2017) shall be adhered to in the case of transportation to and from the site of any dangerous goods.

The contractor, in accordance with the abovementioned Directives, is legally required to:-

- Prevent waste disposal constituting a public nuisance through excessive noise levels or unpleasant odours, or to degrade places of special natural interest;
- Prohibit the dumping or uncontrolled disposal of waste;
- Ensure that the disposal and recovery of waste does not present a risk to water, air, soil, plants and animals;
- Ensure that waste treatment operations are licensed ;
- Prepare a Waste Management Plan;
- Require waste collectors to have special authorization and to keep records; and
- Ensure that the waste which cannot be prevented or recovered is disposed of without causing environmental pollution.

The EU Integrated Pollution Prevention and Control (IPPC) Directive (Directive 96/61/EC) provides for a permit system for activities including waste management. In adherence with this Directive, the contractor must:-

- Be in possession of a waste permit for waste disposal; and
- Be prepared at all times for inspection regarding monitoring of waste activities.

## 1.4 Reference Documents

The production of this WMP has been supported by best practice manuals and will be accounted for in the further development of the appointed contractor's detailed CEMP.

Other guidance documents have been used to develop this WMP; including a Planning-Stage Construction & Environmental Management Plan, Spoil Management Plan, Surface Water Management Plan, and Environmental & Emergency Response Plan.

## 2.0 Requirements of a WMP

There are four stages to be followed in the management of waste:-

- Planning;
- Implementation;
- Monitor; and
- Review.

### 2.1 Planning

During the planning/design/development stages of the White Hill Wind Farm, the nature of the site has been accounted for as well as the environmental considerations and the design of the project. Insightful planning at the early stages will help minimise the quantity of waste produced.

### 2.2 Implementation

The detailed WMP, to be prepared prior to construction, will implement the management of the following:-

- A brief of waste types expected to be produced;
- Estimates of quantum of each type of waste expected to be produced;
- An explanation of how the contractor aims to minimise the different waste types produced prior to any activity that generates this waste; and
- Procedures for identification of the waste management actions proposed for each different waste type, including re-using, recycling, recovery and disposal (as per the waste hierarchy priorities).

All workers will be fully briefed of waste management procedures and aware of their requirements under the WMP. All site visitors will be briefed on appropriate waste storage and disposal units. Littering will not be tolerated and all personnel will have a duty to challenge those who do not comply with WMP procedures.

### 2.3 Monitoring

#### 2.3.1 Checks and Records

All stores on site of oil, fuel and chemicals should be visually inspected on a regular basis, especially during extreme weather conditions. Visual inspections will reveal evidence of leaks, spills or contamination.

Records of all visual checks must be maintained and be made available upon request for inspection. The topic of waste management will be regularly discussed during team meetings and, as required, waste management practices should be continually revised.

### 2.3.2 Waste Inventory

A waste inventory should be continually updated and will include a list of all waste materials leaving the site for disposal as well as the name of the appropriately licensed operator and intended disposal facility. A waste inventory will be added to this plan by the contractor.

### 2.3.3 Monitoring of WMP

The contractor will appoint the EM to implement and monitor the WMP. The WMP should include an inventory of the types of estimates of the waste to be produced on site. The aim will be to keep the volumes of waste produced below the estimates of waste to be produced. The EM will ensure that a waste audit is carried out every 6-months.

## 2.4 Review

Upon completion of the construction phase, a waste management review will be undertaken. The aim will be to measure compliance with the WMP objectives and to consider lessons learnt. The review will be carried out by the EM in conjunction with the contractor.

## 3.0 General Waste Management Principles

- It is the contractors responsibility to avoid or minimise the volume of waste generated;
- Waste storage and disposal procedures will prevent pollution in compliance with legislation;
- Waste, including spoil, will be stored (regardless of whether it is permanent or temporary storage) a minimum of 10m from nearby watercourses or drain;
- All waste to be transported off-site shall only be removed to a licensed disposal site. Waste control dockets must be produced and filed on site with each load, and must detail:-
  - An adequate description of the waste;
  - Where the waste came from;
  - The appropriate code from the List of Wastes Regulations for the waste (commonly referred to as the EWC code);
  - Information on the quantity and nature of the waste and how it is contained;
  - Names and addresses of the transferor (the person currently in control of the waste) and the transferee (usually either a registered waste carrier or a waste management license holder (waste manager);
  - The Standard Industry Classification (SIC) CODE (2007 or 2003 for hazardous waste only) of the business from where the waste was received;
  - Where applicable, indicate that the waste hierarchy has been complied with;
  - The place, date and time of transfer of the waste. If using a season ticket, the period for which it is valid (i.e. valid from dd/mm/yyyy to dd/mm/yyyy); and
  - If the waste is being taken to landfill the transfer note must also contain details of any treatments or processes that have already been applied;
- Only trained operatives should handle hazardous substances. All stored hazardous waste will be clearly labelled;

- No storage of hydrocarbons or any toxic waste chemicals should occur within 50m of a watercourse/drainage ditch;
- All associated hazardous waste residuals (including use oil spill kits), such as oil, solvents, used absorbent materials on minor oil spills, glue and solvent based paint containers will be stored within appropriately covered skips prior to removal by a suitable Local Authority or EPA approved waste management contractor for off-site treatment/recycling/disposal;
- Rainwater, which has collected within bunded areas used for the storage of oils, chemicals and waste, will be collected and disposed off-site by suitably qualified waste contractors;
- Waste derived from the port-a-cabins (office and canteen facility) on-site will be placed in an appropriately designed waste storage area prior to collection a licensed contractor under the Waste Management Act, 1996;
- Port-a-loos will be regularly maintained by a suitably qualified waste contractor engaged by the supplier;
- Waste storage areas will be clearly located and signed. If space allows key waste streams will be separated;
- All waste should be transported from site at appropriate frequency by a registered waste contractor to prevent over-filling of waste containers; and
- Frequency of Checks: the contractor will ensure that all storage facilities are checked on a weekly basis. The checklist for completion is attached below.

Waste Checklist		
Waste area checked	Date Checked	Checked By
General office waste		
Bowser		
Portaloo		
Excavated soil		
Washings		
Concrete		
Oil		
Hazardous Waste		

#### 4.0 Typical Waste Streams

##### 4.1 Waste Inventory

The typical waste arising during the construction of the project is provided below. This inventory will be further expanded upon by the contractor prior to the commencement of construction.

Material Type	EWC	Predicted Quantity
Waste from Portaloo		
Concrete		
Hazardous Material (oil contaminated material, oily rags, etc.)		
Timber (pallets, shuttering, cable drums, packaging, etc.)		

Packaging (paper, plastic, etc.)		
Excavated Material (soil, subsoil, rock, road cuttings, etc.)		
Cable (electrical, etc.)		
Cardboard		
Metals (copper, aluminum, lead, iron, steel, etc.)		

#### 4.2 Management of Waste

All waste will be segregated and securely stored at the temporary construction compound, in skips and receptacles, which will be covered to protect the contents from the weather. A licensed operator will collect and transfer the skips/receptacles of both recyclable and non-recyclable wastes as they are filled. Where this is not practicable, or where the quantity of waste is small, the contractor will remove the waste to his yard on a daily basis for onward disposal.

A list of licensed operators will be identified provided below.

Permit Number	Name of Permit Holder	Address of Waste Facility	Type of Waste Permitted

**Annex 3 –  
Spoil Management Plan**





White Hill Wind Farm

# Planning-Stage Construction & Environmental Management Plan

## Spoil Management Plan

White Hill Wind Limited

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## 1.0 Introduction

Galetech Energy Services (GES), on behalf of White Hill Wind Limited, has prepared this Spoil Management Plan (SMP) to detail the appropriate management of excavated material arising from the construction of the White Hill Wind Farm.

### 1.1 Purpose of this Report

This SMP provides the framework for the management of spoil at the site of the White Hill Wind Farm for contractors and incorporates the measures set out in the various environmental assessment documents associated with the development. The purpose of this report is to ensure that spoil is managed safely and re-used without resulting in any adverse environmental effects, and to ensure that all spoil handling/management activities are carried out in accordance with best practice methods.

This is a live document and will be updated by the appointed contractor prior to the commencement of development. Prior to the commencement of construction, the updated SMP will be reviewed by the Environmental Manager (EM) to confirm the appropriateness of the measures set out therein.

### 1.2 Aims of this SMP

The overall objective of this SMP is to provide for the appropriate management of excavated material arising from the construction of the White Hill Wind Farm. In doing so, the re-use of excavated material, locally to its excavation, will be maximised through reinstatement and landscaping proposals.

The reinstatement of excavated materials will occur as close to the site of excavation as possible. Excavated material horizons (topsoil, subsoil, rock, etc.) will be stored separately to ensure appropriate re-use; and will be replaced in sequence and to depths similar to those recorded prior to excavation.

Excavated material may also be used in the landscaping of the site; for example, the creation of berms around crane hardstandings or along access tracks to reduce the visual effects of the infrastructure. Again, material will be placed close to its source and will be placed in a fashion which allows for vegetative re-growth thus allowing for spoil to be assimilated into the local environment.

### 1.3 Reference Documents

The production of this SMP has been supported by best practice manuals and will be accounted for in the further development of the appointed contractor's detailed CEMP.

Other documents have been used to develop this SMP; including a Planning-Stage Construction & Environmental Management Plan, Surface Water Management Plan, and Environmental & Emergency Response Plan.

## 2.0 Description of the Project

White Hill Wind Limited intend to construct the White Hill Wind Farm which will consist of:-

- 7 no. wind turbines with an overall tip height of 185m, and all associated ancillary infrastructure;
- Upgrades to the turbine component haul route; and
- Construction of an electricity substation and installation of c. 15km of underground grid connection cable between the White Hill Wind Farm and the existing Kilkenny 110kV electricity substation; and

- All associated and ancillary site development, excavation, construction, landscaping and reinstatement works, including provision of site drainage infrastructure.

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. Forestry replant lands are located within County Monaghan; while candidate quarries which may supply construction materials are also located within counties Carlow and Kilkenny.

As well as the reference documents listed in **Section 1.2**, various environmental reports have been prepared for the development including:-

- Environmental Impact Assessment Report (Galetech Energy Services);
- Biodiversity Chapter (Ecology Ireland);
- Land & Soil Chapter (Hydro Environmental Services);
- Water Chapter (Hydro Environmental Services); and
- Natura Impact Statement (Ecology Ireland).

### 3.0 Description of Baseline Environment

#### 3.1 Site Location

The wind farm is located in in west County Carlow and east County Kilkenny; c. 13km southwest of Carlow, c. 14km northeast of Kilkenny City and c. 4km west of Oldleighlin. The wind farm will be located in the townlands of Ridge (Ridge E.D.), Knocknabranagh and Knockbaun, and Baunreagh, Co. Carlow; and Coolcullen, Co. Kilkenny.

The project site is located on an elevated plateau, known as the Castlecomer Plateau, which is located in south county Laois, northwest county Carlow and northeast county Kilkenny. The Castlecomer Plateau is characterised by undulating hills and steep escarpments at its fringes. Dissecting the lowlands on either side of the plateau are the rivers Barrow and Nore, which lie to the east and west respectively. The lowlands are a mixture of pasture and tillage with fields typically bordered by mature broadleaf tree lines and hedgerows. Agricultural land uses extend into the upland areas in the form of more marginal grazing with scrubby hedgerow field boundaries. Extensive commercial conifer plantations emerge on higher slopes throughout the Castlecomer Plateau.

#### 3.2 Topography

The topography of the wind farm site is 'hilly-to-undulating' with the overall site elevation ranging between approximately 220m and 290m OD (Ordnance Datum). The higher elevations occur in the central and eastern areas of the site with the land sloping generally towards the north and west in the direction of the Coolcullen River which flows in a generally northerly direction through the wind farm site. The elevation of the electricity substation, located in the south of the wind farm site, is at approximately 280m OD.

The grid connection route runs in a southerly direction for approximately 15km between the electricity substation to the existing 110kV substation at Scart, Co. Kilkenny. The grid connection comprises underground cable to be located predominately within the carriageway of the public road network, with short sections at the respective substations being located within private lands. The ground elevation along the grid connection decreases to c. 65m OD at the substation near Kilkenny.

The forestry re-plant lands are almost exclusively agricultural pasture, with fields bounded by hedgerows and treelines. Ground elevations across the re-plant lands range generally between 110m OD and 140m OD.

### 3.3 Geological Environment

Based on the GSI/Teagasc soils mapping ([www.gsi.ie](http://www.gsi.ie)), the wind farm site is mainly overlain by deep poorly drained mineral soils (AminPD) and, to a lesser extent, shallow well drained mineral soils (AminSW) of acidic nature. Some acid poorly drained mineral soils (AminSP) are also found in the east and southwest of the wind farm site and are mapped in the area of the electricity substation. Pockets of blanket peat (BktPt) and poorly drained mineral soils with a peaty topsoil (AminPDPT) are also mapped on the north of the wind farm site.

The soil types along the grid connection route are similar to the wind farm site, with alluvium mapped along many of the local rivers and streams in the area.

Poorly drained soil is mapped at the temporary access track at the junction of the N78 and L1834 and at the carriageway strengthening works along the L1834 ('Black Bridge') and at Crettyard Bridge.

The replant lands are mapped as comprising poorly drained mineral soil.

GSI subsoils mapping ([www.gsi.ie](http://www.gsi.ie)) show that Till derived from Namurian sandstones and shales (TNSSs) is the dominant subsoil type at the wind farm site. Bedrock outcrop or subcrop is mapped on the more elevated central and eastern sections of the wind farm site. Localised patches of Blanket Peat (BktPt) are mapped on the north-western section of the project site. However, it should be noted that no infrastructure is located within areas mapped as Blanket Peat. The absence of peat at all wind turbine locations, and locations of other key infrastructure, was confirmed by site investigations. No blanket peat was encountered or identified at any location within the project site.

Bedrock outcrop is dominant along much of the grid connection route, with the other subsoil types along the route similar to those mapped within the wind farm site (i.e. sandstones and shale tills).

Towards the southern end of the grid connection route, there are pockets of Karstified bedrock outcrop or subcrop (KaRck), Gravels derived from Namurian sandstones and shales (GNSSs) and Alluvium (A). Meanwhile, Till derived from limestones (TLs) is mapped to the far south of the grid connection and underlying the existing 110kV electricity substation.

Namurian sandstones and shales are also mapped at temporary access track at the junction of the N78 and L1834, at the carriageway strengthening works along the L1834 (Black Bridge) and at Crettyard Bridge.

The subsoil type at the replanting lands are sandstone/shale tills.

### 3.4 Hydrological Environment

On a regional scale, the wind farm site is located predominantly (c. 97%) in the River Nore surface water catchment within Hydrometric Area 15. The southernmost section of the wind farm site (c. 3%), which includes only the location of the electricity substation, is situated within the regional River Barrow surface water catchment within Hydrometric Area 14.

On a more local scale, the majority (c. 97%) of the wind farm site (including all of the turbine locations) is located in the Dinin River sub-catchment (Dinin [South]\_SC\_010).

The Dinin River drains into the River Nore approximately 25km downstream of the wind farm site.

The southernmost section (c. 3%) of the wind farm site within the regional River Barrow catchment drains locally to the Monefelim River within the Barrow\_SC\_120 sub-catchment. The Monefelim River drains into the River Barrow approximately 15km downstream of the wind farm site.

The majority of the grid connection route (c. 13km of the total c. 15km) is located in the River Nore surface water catchment within the Dinin [South]\_SC\_010 and Nore\_SC\_100 sub-catchment. The remaining c. 2km is located in the regional River Barrow surface water catchment within the Monefelim River sub-catchment (Barrow\_SC\_120).

The haul route works at the junction of the N78 and L1834, Crettyard Bridge and Black Bridge are located in the Dinin [North]\_SC\_010.

The replanting lands are located in the Fane\_SC\_010 sub-catchment.

#### 4.0 General Spoil Management Proposals

The following are a suite of general measures which will be adhered to in the management of excavated material:-

- Excavated material will be re-used on-site for reinstatement and landscaping insofar as possible;
- Excavated material will be stored, separately, according to its characteristics (e.g. topsoil shall not be contaminated by subsoil or rock);
- Excavated rock shall be utilised in the construction of access tracks and crane hardstandings;
- Excavated sub-soil shall be prioritised for the reinstatement of infrastructure (e.g. turbine foundations and borrow pits);
- Excavated topsoil shall be prioritised for final landscaping measures (e.g. ground profiling/grading, finishing of berms, finishing of borrow pit reinstatement, finishing of spoil deposition area reinstatement, etc.);
- Road cuttings, or other unsuitable material, shall not be used for reinstatement and shall be removed from site and disposed of at an approved waste management facility;
- Where excavated material is to be re-used (for reinstatement or landscaping), it shall be side-cast and stored temporarily in an appropriate manner. Where excess material arises which will not be re-used at the excavation location, it shall be used in the construction of berms or transported to the spoil deposition areas (or borrow pits) for permanent storage;
- Temporary storage locations shall be appropriately sited to avoid any smothering of important habitats or risk of sediment discharge to watercourses;
- Temporary storage locations will be carefully selected to avoid any ground instability risks;
- The temporary storage locations will be regularly inspected by the EM; and
- Reinstatement/landscaping works will commence as soon as practicable following the completion of individual work streams thus allowing for the timely management of material and early commencement of re-vegetation thus reducing the likelihood of soil erosion or release of silt/sediment.

## 5.0 Estimated Excavation Quantities

On the basis of site investigations undertaken at the project site and the completion of the preliminary project (civil/electrical) design process; estimated volumes of material likely to be excavated during construction have been identified. The project will, should planning permission be granted, be subject to a further detailed design process where the volume of material to be excavated will be further refined. Accordingly, it is important to highlight that the volumes set out below are estimates based on the design process completed to date, the findings of the site investigations, and past experience of similar wind energy developments.

### 5.1 Site Entrances, Access Tracks, Turbine Foundations & Crane Hardstandings

Infrastructure ID	Total Excavated Material (m <sup>3</sup> )	Rock for use in Construction (m <sup>3</sup> )	Subsoil for use in Reinstatement/Landscaping/Spoil Deposition Area (m <sup>3</sup> )	Topsoil for use in Reinstatement/Landscaping/Spoil Deposition Area (m <sup>3</sup> )
Main Site Entrance	2,667	1	1,643	1,023
Access Track	4,871	128	2,890	1,853
Site Entrance 2	110	0	4	106
Site Entrance 3	450	0	232	218
Turbine 1 Access Track, Hardstand, & Foundation	29,465	25,952	1,679	1,834
Turbine 2 Access Track, Hardstand, & Foundation	19,406	16,390	1,424	1,592
Turbine 3 Access Track, Hardstand, & Foundation	9,848	4,830	3,961	1,057
Turbine 4 Access Track, Hardstand, & Foundation	9,194	221	5,951	3,022
Turbine 5 Access Track, Hardstand, & Foundation	7,339	6,066	1	1,272
Turbine 6 Access Track, Hardstand, & Foundation	3,002	825	1,083	1,094
Turbine 7 Access Track, Hardstand, & Foundation	9,461	1,132	6,902	1,427

Miscellaneous (construction compound, met mast, drainage, ducting, etc.)	10,596	4,270	5,509	817
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**Table 1: Estimated Spoil Volumes at Wind Farm Site**

## 5.2 Electrical Substation & Grid Connection

Infrastructure ID	Total Excavated Material (m <sup>3</sup> )	Rock for use in Construction (m <sup>3</sup> )	Subsoil for use in Reinstatement/Landscaping/Spoil Deposition Area (m <sup>3</sup> )	Topsoil for use in Reinstatement/Landscaping/Spoil Deposition Area (m <sup>3</sup> )
Substation Compound	720	-	520	200
Substation Access Track	960	-	330	270
Grid Connection	12,622	-	11,686*	-

**Table 2: Estimated Spoil Volumes at Electrical Substation & Grid Connection Route**

*\*Approximately 91m<sup>3</sup> will be used for reinstatement of the grid connection with remaining suitable material being transported to the spoil deposition areas. Unsuitable material (road cuttings), estimated to be c. 845m<sup>3</sup>, will be removed and disposed of off-site.*

## 5.3 Haul Route Upgrade Works

Infrastructure ID	Total Excavated Material (m <sup>3</sup> )	Rock for use in Construction (m <sup>3</sup> )	Subsoil for use in Reinstatement/Landscaping/Spoil Deposition Area (m <sup>3</sup> )	Topsoil for use in Reinstatement/Landscaping/Spoil Deposition Area (m <sup>3</sup> )
Upgrade Works	879	-	270*	609*

**Table 3: Estimated Spoil Volumes at Haul Route Upgrade Locations**

*\*All excavated material at a given location will be utilised for its reinstatement*

## 6.0 Use of Excavated Material

As outlined above, there are a number of possible uses for excavated material which has no further purpose in the construction process. In accordance with the aims of this SMP, all usable excavated material (i.e. rock) will be utilised in the construction of access tracks and crane hardstandings. This is a significant advantage of the project and avoids the importation of large volumes of rock, which may exhibit different geological characteristics to that of the project site, while maintaining the geological integrity of the site.

### 6.1 Reinstatement of Infrastructure

Excavated subsoil and topsoil will, in the first instance, be utilised for the reinstatement of infrastructure including access track edges, crane hardstanding edges, and to provide turbine foundation ballast. Once again, this will ensure that material is, insofar

as is practicable, be reinstated at or close to its source location. Following the placement of subsoil, a layer of topsoil will be spread across the affect area, graded to match the surrounding ground profile, and re-seeded.

## 6.2 Landscaping & Permanent Storage

Where subsoil and topsoil is not to be used for reinstatement at its source location, a number of permanent storage options are available, as follows:-

- The creation of track-side and hardstanding-side berms. Berms, constructed predominately of subsoil and topped with topsoil, with an approximate height of 1m could be constructed to permanently store material. The creation of berms, at appropriate locations, aids in the visual assimilation of infrastructure into the landscape and can assist in screening access tracks and hardstandings from view;
- Permanent storage of material in the spoil deposition areas. While it is estimated that the above reinstatement and landscaping processes will account for substantial volumes of surplus material; 2 no. dedicated spoil deposition areas will be developed where excess material which cannot be utilised for reinstatement or is unsuitable for landscaping purposes will, if such a scenario arises, be stored permanently. The location of the deposition areas have been chosen as they comprise either a natural localised depression in the landscape or flat/level ground, due to the absence of any particular environmental constraints, separation distance to watercourses and generally flat or gently sloping gradient. Spoil will be transported to these locations where it will be placed in layers in accordance with best-practice methods. Appropriate drainage management measures will be implemented to ensure that the deposited spoil does not become waterlogged. Following completion, the depositions area will be graded to match surrounding ground profiles, capped with topsoil and re-seeded; and
- Reinstatement of borrow pits. As described in the EIAR, 3 no. borrow pit locations have been identified and may be developed if a sufficient volume of rock material is not encountered in the course of excavations associated with the project. Where a borrow pit is developed, excess spoil material shall be prioritised in the restoration of the borrow pit.

The layout of the deposition areas and borrow pit reinstatement, including drainage arrangements, is illustrated at **Annex 2** of the Surface Water Management Plan.

## 6.3 Disposal Off-Site

Any spoil generated which is unsuitable for reinstatement or landscaping purposes or for storage within berms or the deposition area (e.g. tarmac cuttings from site entrance construction or grid connection installation) shall be removed from site and disposed of at a licensed waste disposal facility.

## 7.0 Conclusion

This SMP has been prepared to detail the appropriate management of material excavated during the construction of the White Hill Wind Farm. Overall, it is assessed that there is sufficient capacity within the project to accommodate all excavated material, through re-use and reinstatement, such that no significant volume of material will be transported off-site. Excavated material will be utilised in the reinstatement of infrastructure, landscaping, and permanent storage within berms and a spoil deposition area.

This is a live document and will be updated by the appointed contractor prior to the commencement of development. Prior to the commencement of construction, the updated SMP will be reviewed by the EM to confirm the appropriateness of the measures set out therein.

**Annex 4 –  
Surface Water Management Plan**





White Hill Wind Farm

Planning-Stage Construction  
& Environmental  
Management Plan

Surface Water Management  
Plan

White Hill Wind Limited

Galetech Energy Services

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## 1.0 Introduction

Galetech Energy Services (GES), on behalf of White Hill Wind Limited, has prepared this Surface Water Management Plan (SWMP) for the construction and operational phases of the White Hill Wind Farm.

### 1.1 Purpose of this Report

This SWMP provides the framework for water management at the site of the White Hill Wind Farm for contractors and incorporates the measures set out in the various environmental assessment documents associated with the development. The purpose of this report is to detail the practical implementation of these measures such that the construction and operational phases do not have an adverse effect on water quality.

This is a live document and will be updated by the appointed contractor prior to the commencement of development. Prior to the commencement of construction, the updated SWMP will be reviewed by the Environmental Manager (EM) and Ecological Clerk of Works (EcoW), as necessary, to confirm the appropriateness of the measures set out therein.

This SWMP aims to:-

- Describe environmental sensitives of the site and any applicable buffer zones;
- Describe how the system will operate to minimise modification and disruption to the existing site hydrology;
- Outline the proposed maintenance regime; and
- Outline the proposed drainage management post-construction.

### 1.2 Reference Documents

The production of this SWMP has been supported by best practice manuals and will be accounted for in the further development of the appointed contractor's detailed CEMP.

Other documents have been used to develop this SWMP; including a Planning-Stage Construction & Environmental Management Plan, Spoil Management Plan, and Environmental & Emergency Response Plan.

#### 1.2.1 Legislative Background

This report has been prepared in accordance with the following legislation:-

- S.I. 10 of 1972 Dangerous Substances Act, 1972, as amended;
- S.I. No. 293 of 1988 Quality of Salmon Water Regulations;
- S.I. No. 249 of 1989 Quality of Surface Water Intended for Abstraction (Drinking Water);
- S.I. No. 94 of 1997 European Communities (Natural Habitats) Regulations;
- S.I. No. 41 of 1999 Protection of Groundwater Regulations;
- Water Framework Directive (2000/60/EC);
- S. I. No. 600 of 2001 Planning and Development Regulations 2001, as amended;
- S.I. No. 722 of 2003 European Communities (Water Policy) Regulations;
- S.I. 547 of 2008 European Communities (Environmental Liability) Regulations;
- S.I. No. 272 of 2009 European Communities Environmental Objectives (Surface Waters) Regulations;
- S.I. No. 9 of 2010 European Communities Environmental Objectives (Groundwater) Regulations 2010; and
- S.I. No. 350 of 2014 European Union (Water Policy) Regulations 2014.

### 1.2.2 Construction Industry Research & Information Association (CIRIA) Manuals

- CIRIA (Construction Industry Research & Information Association) Report C502 Environmental Good Practice on Site;
- CIRIA 521 - Sustainable Urban Drainage Systems; Design Manual for Scotland and Northern Ireland;
- CIRIA Report C532 Control of Water Pollution from Construction Sites;
- CIRIA Report C648 Control of Pollution from Linear Construction Project Technical Guidance;
- CIRIA Handbook C650 Environmental good practice on site;
- CIRIA Handbook C651 Environmental good practice on site checklist;
- CIRIA Report C609 - SuDS - hydraulic, structural & water quality advice;
- CIRIA Report C697 - The SuDS Manual; and
- Guidelines on Protection of Fisheries during Construction Work in and Adjacent to Water (Inland Fisheries Ireland, January 2016).

## 2.0 Description of the Project

White Hill Wind Limited intend to construct the White Hill Wind Farm which will consist of:-

- 7 no. wind turbines with an overall tip height of 185m, and all associated ancillary infrastructure;
- Upgrades to the turbine component haul route; and
- Construction of an electricity substation and installation of c. 15km of underground grid connection cable between the White Hill Wind Farm and the existing Kilkenny 110kV electricity substation; and
- All associated and ancillary site development, excavation, construction, landscaping and reinstatement works, including provision of site drainage infrastructure.

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. Forestry replant lands are located within County Monaghan; while candidate quarries which may supply construction materials are also located within counties Carlow and Kilkenny.

As well as the reference documents listed in **Section 1.3**, various environmental reports have been prepared for the development including:-

- Environmental Impact Assessment Report (Galetech Energy Services);
- Biodiversity Chapter (Ecology Ireland);
- Land & Soil Chapter (Hydro Environmental Services);
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- Natura Impact Statement (Ecology Ireland).

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The project site is located on an elevated plateau, known as the Castlecomer Plateau, which is located in south county Laois, northwest county Carlow and northeast county Kilkenny. The Castlecomer Plateau is characterised by undulating hills and steep escarpments at its fringes. Dissecting the lowlands on either side of the plateau are the rivers Barrow and Nore, which lie to the east and west respectively. The lowlands are a mixture of pasture and tillage with fields typically bordered by mature broadleaf tree lines and hedgerows. Agricultural land uses extend into the upland areas in the form of more marginal grazing with scrubby hedgerow field boundaries. Extensive commercial conifer plantations emerge on higher slopes throughout the Castlecomer Plateau.

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The forestry re-plant lands are almost exclusively agricultural pasture, with fields bounded by hedgerows and treelines. Ground elevations across the re-plant lands range generally between 110m OD and 140m OD.

### 3.3 Hydrological Environment

On a regional scale, the wind farm site is located predominantly (c. 97%) in the River Nore surface water catchment within Hydrometric Area 15. The southernmost section of the wind farm site (c. 3%), which includes only the location of the proposed electricity substation, is situated within the regional River Barrow surface water catchment within Hydrometric Area 14.

On a more local scale, the majority (c. 97%) of the wind farm site (including all of the proposed turbine locations) is located in the Dinin River sub-catchment (Dinin [South]\_SC\_010). The Dinin River drains into the River Nore approximately 25km downstream of the wind farm site.

The southernmost section (c. 3%) of the wind farm site within the regional River Barrow catchment drains locally to the Monefelim River within the Barrow\_SC\_120 sub-catchment. The Monefelim River drains into the River Barrow approximately 15km downstream of the wind farm site.

The majority of the grid connection route (c. 13km of the total c. 15km) is located in the River Nore surface water catchment within the Dinin [South]\_SC\_010 and Nore\_SC\_100 sub-catchment. The remaining c. 2km is located in the regional River Barrow surface water catchment within the Monefelim River sub-catchment (Barrow\_SC\_120).

The proposed haul route works at the junction of the N78 and L1834, Crettyard Bridge and Black Bridge are located in the Dinin [North]\_SC\_010.

The replanting lands are located in the Fane\_SC\_010 sub-catchment.

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Based on the GSI/Teagasc soils mapping ([www.gsi.ie](http://www.gsi.ie)), the wind farm site is mainly overlain by deep poorly drained mineral soils (AminPD) and, to a lesser extent, shallow well drained mineral soils (AminSW) of acidic nature. Some acid poorly drained mineral soils (AminSP) are also found in the east and southwest of the wind farm site and are mapped in the area of the electricity substation. Pockets of blanket peat (BktPt) and poorly drained mineral soils with a peaty topsoil (AminPDPT) are also mapped on the north of the wind farm site.

The soil types along the grid connection route are similar to the wind farm site, with alluvium mapped along many of the local rivers and streams in the area.

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The replant lands are mapped as comprising poorly drained mineral soil.

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Bedrock outcrop is dominant along much of the grid connection route, with the other subsoil types along the route similar to those mapped within the wind farm site (i.e. sandstones and shale tills).

Towards the southern end of the grid connection route, there are pockets of Karstified bedrock outcrop or subcrop (KaRck), Gravels derived from Namurian sandstones and shales (GNSSs) and Alluvium (A). Meanwhile, Till derived from limestones (TLs) is mapped to the far south of the grid connection and underlying the existing 110kV electricity substation.

Namurian sandstones and shales are also mapped at temporary access track at the junction of the N78 and L1834, at the carriageway strengthening works along the L1834 (Black Bridge) and at Crettyard Bridge.

The subsoil type at the replanting lands are sandstone/shale tills.

### 3.5 Flood Risk Assessment

OPW's River Flood Extents Mapping, National Indicative Fluvial Mapping, Past Flood Event mapping (<https://www.floodinfo.ie/map/floodmaps/>) and historical mapping (i.e. 6" & 25" base maps) were consulted to identify those areas of the project which are at risk of fluvial flooding.

No recurring flood incidents within the project site boundary, along the grid connection, haul route work areas, or forestry re-plant lands were identified from OPW's Past Flood Event Mapping.

The closest mapped recurring flooding event to the wind farm site is at Lackan townland approximately 2.5km to the southeast of the wind farm where OPW flood reports refer to the occurrence of localised road flooding. This mapped flood event is not downstream of the wind farm. There are no mapped recurring flooding events downstream of the wind farm.

Identifiable map text on local available historical 6" or 25" mapping for the project site area do not identify any lands that are "liable to flood".

There is no OPW River Flood Extents Mapping available for the project site and therefore the National Indicative Fluvial Mapping was consulted which has estimated fluvial flood zones for the Coolcullen River.

Based on the National Indicative Fluvial Mapping, the 100-year and 1000-year flood zone of the Coolcullen River does not encroach the project site. There are fluvial flood zones associated with the Coolcullen River immediately downstream of the northern wind farm site boundary.

No flood zones are mapped along the grid connection, haul route works areas, or forestry re-plant lands.

All project infrastructure is located above the mapped 1000-year flood level and therefore all infrastructure is located in Flood Zone C (Low Risk).

It is a key design feature of the project to ensure that all surface water runoff is treated (water quality control) and attenuated (water quantity control) prior to diffuse discharge at pre-existing Greenfield rates. As such, the mechanism by which downstream flooding, as a result of the project, is prevented and controlled is through avoidance by design.

### 3.6 Nature Conservation Sites

Within the Republic of Ireland, designated sites include National Heritage Areas (NHAs), proposed National Heritage Areas (pNHAs), candidate Special Areas of Conservation (cSAC), Special Areas of Conservation (SAC) and Special Protection Areas (SPAs).

Local designated sites in the area and downstream of the proposed development site, grid connection and haul route works. The project is not located within any designated conservation site.

The project is hydrologically connected to the River Barrow and River Nore SAC (Site Code: 002162). At its closest point, this designated site is located approximately 1.5km to the north (as crow flies) of the wind farm site and is downstream (hydrologically connected) via the Coolcullen River.

In addition, all of the surface waterbodies draining the grid connection route drain into the River Barrow and River Nore SAC and the River Nore SPA (Site Code: 004233). Given the features of interest of the River Barrow and River Nore SAC, it is considered to be very sensitive to the effects of water quality deterioration; while a deterioration in water quality could also adversely affect the Kingfisher which is present in the River Nore SPA.

There are a number of NHA and pNHA designated sites locally (*i.e.* Coan bogs NHA, Whitehall Quarries pNHA, Dunmore Complex pNHA, Newpark Marsh pNHA etc) but

there is no hydrological connectivity to these designated sites due to the setback distance and presence of intermediate rivers acting as hydraulic boundaries.

## 4.0 Drainage System

### 4.1 Sustainable Drainage System

Surface water is a valuable resource and this should be reflected in that way it is managed. The appropriate management of surface water should be considered at the early stages of the project design process. It is important, particularly on large developments such as the White Hill Wind Farm, that the management of surface water is managed in a fashion which prevents significant alterations to the existing hydrological regime whilst ensuring the appropriate drainage of the proposed site.

The project has been designed to implement a Sustainable Drainage System (SuDS) which seeks to:-

- Minimise any change to the surface water and groundwater conditions within the site;
- Avoid sensitive areas where possible by employing hydrological constraints (i.e. buffer zones);
- Replicate the natural drainage of the site;
- Minimise sediment loads in the runoff, with particular attention being given to the construction phase of the project;
- Maintain runoff rates and volumes at Greenfield rates for a range of storm events (to be incorporated into final detailed design); and,
- Avoid high flow velocities internally within new drain networks and at outfall locations to prevent erosion.

The purpose of a SuDS is:-

- To provide sufficient detail to ensure that water pollution will not occur as a result of construction and operational activities at the site and to minimise the risk of any such occurrence;
- To regulate the rate of surface water run-off downslope to prevent scouring and to encourage settlement of sediment locally; and
- To minimise the quantity of sediment laden stormwater and resulting settlement pond sizes by separating 'clean' water from the 'dirty' development runoff.

#### 4.1.1 SuDS Design

The overarching objective of the SuDS design is to ensure that all surface water runoff is comprehensively attenuated such that no silt or sediment laden waters or deleterious material is discharged into the local drainage system. While the SuDS is, overall, an amalgamation of a suite of drainage infrastructure; the objectives are straightforward. In summary:-

- All surface water runoff will be directed to specially constructed swales surrounding all areas of ground proposed to be disturbed;
- The swales will direct runoff into silt traps/ponds where silt/sediment will be allowed to settle; and
- Following the settlement of silt/sediment, clean water will be discharged indirectly to the local drainage network via buffered outfalls thus ensuring that no scouring/erosion occurs.

The design criteria for the SuDS is as follows:-

- To minimise alterations to the ambient site hydrology and hydrogeology;

- To provide settlement and treatment controls as close to the site footprint as possible and to replicate, where possible, the existing hydrological environment of the site;
- To minimise sediment loads resulting from the development runoff during the construction phase;
- To preserve greenfield runoff rates and volumes;
- To strictly control all surface water runoff such that no silt or other pollutants shall enter watercourses and that no artificially elevated levels of downstream siltation or no plumes of silt arise when substratum is disturbed;
- To provide appropriate retention times such that and no flooding will occur on local roads in the vicinity of the project site which may cause a traffic hazard;
- To provide settlement ponds to encourage sedimentation and storm water runoff settlement;
- To provide lagoon-type sediment traps which follow a design outlined by Altmüller and Dettmer (2006). The tertiary treatment system of the lagoon maturation ponds will absorb the fine particles, which may not settle in the primary and secondary settlement ponds. These ponds are to be vegetated so as to perform the role of plant filtration best described on Page 7 of the Altmüller and Dettmer document<sup>1</sup> (see **Annex 1**);
- To reduce stormwater runoff velocities throughout the site to prevent scouring and encourage settlement of sediment locally;
- To manage erosion and allow for the effective revegetation of bare surfaces;
- To control water within the site and allow for the discharge of runoff from the site within the limits prescribed in the Freshwater Pearl Mussel and Salmonid Regulations;
- To ensure that oils, fuels and other contaminants are stored appropriately and bunded to prevent any discharge of such materials. The temporary construction compound, where such oils and fuels will be stored, shall incorporate an oil/petrol interceptor within its drainage system. Similarly, an oil/petrol interceptor shall be installed at the proposed electrical substation;
- Additional drainage measures will only be added as necessary. The dimensions of these features will avoid intercepting large volumes of water;
- Storm water runoff from hardstandings and access tracks will be managed via filter drains consisting of open land drains, swales and settlement ponds/lagoon-type sediment traps. Access tracks and hardstandings will crossfall downslope to mimic the natural drainage patterns of the site.
- Swale/settlement pond vegetation used will be appropriate to the local area;
- Temporary erosion protection together with silt fences may be required until the vegetation becomes established (coir matting or similar);
- Access tracks and hardstandings will be constructed from aggregate and will not be surfaced with bitumen materials, thus helping to reduce runoff volumes. Therefore a reduced runoff coefficient of 50% is applicable;
- An additional 20% will be included to take account for global warming;
- A large portion of the hardstanding construction will be of single sized stone therefore the pore spacing in the hardstanding and road will also act to store and attenuate water;
- Swales will be primarily used to attenuate water and to encourage discharge into the ground locally;

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<sup>1</sup> Altmüller R. & Dettmer, R. (2006) *Successful species protection measures for the Freshwater Pearl Mussel (Margaritifera margaritifera) through the reduction of unnaturally high loading of silt and sand in running waters – Experiences within the scope of the Lutterproject.*

- Outflow points will be taken from the swales into the existing onsite drainage channels. Silt fences will be maintained at the interface between the proposed and existing drainage channels for the duration of the construction phase;
- Stormwater runoff within the swale will be treated through the provision of small silt fences or check dams, within a range depending on local slope of swale;
- The stone used for the construction of the check dams will be washed graded stone with a size range between approximately 5mm and 40mm;
- Swales will provide a flow route in extreme events to carry water to the existing surface water channels across site. It will be necessary to increase the cross sectional area of the swales further downstream of the footprint as larger volumes of stormwater are conveyed;
- Discharging directly back into the surrounding area will assist in maintaining the hydrological characteristics of the site;
- Vegetation will be reinstated on slopes as early as possible;
- Under track drainage will be provided with associated sumps and silt fences. The under track drainage will provide a means for flows to pass from a swale on the uphill side of the slope to the downhill side of the slope.
- A sump may be required to collect dewaterings from excavations for turbine foundations; water will subsequently be pumped into the settlement pond system and allowed to settle prior to discharging into the swales;
- All swales and ponds will be kept as shallow as possible so that they do not pose any health and safety risk to plant or personnel;
- Field drains/streams will be piped directly under the track through appropriately sized drainage pipes;
- The Office of Public Works (OPW) will be consulted on all stream crossings through the applications for Section 50 consent, prior to works commencing. The design of these crossings follow guidance from Inland Fisheries Ireland;
- Appropriate site management measures will be taken such that runoff from the construction site is not contaminated by fuel or lubricant spillages;
- There will be no discharge of sewage effluent or contaminated drainage into any watercourse system or ditch; and
- The drainage system will be monitored regularly during the construction phase for effectiveness, and cleaned or unblocked if necessary.

#### 4.1.2 SuDS Design Philosophy

The SuDS design principles are as follows:-



##### Minimise

The main principle of this SuDS design is to minimise the volume of 'dirty' water requiring treatment through means of informed, integrated and sustainable drainage design. This is achieved by keeping 'clean' water clean by interception and separation, and by collecting the 'dirty' water and treating it by removing the suspended sediments. The resultant outflow is dispersed across vegetation and will become diluted through contact with the clean water runoff before entering the natural drainage system.

##### Intercept

The key silt/sediment control measure is the separation of construction runoff from the clean water runoff that arises in the undisturbed areas of the project site and

surrounding lands. This significantly reduces the volume, and velocity, of dirty water that the control measures are required to manage. To achieve separation, clean water infiltration interception drains are positioned on the upslope and dirty water swales/drains positioned along the verge, with site surfaces sloped towards dirty water swales/drains. The remainder of this clean water will be regularly piped under both the access tracks and dirty water swales/drains to prevent contamination. This process allow for the mimicking the paths which clean water would have taken in the absence of the project.

### Treat, Disperse, & Dilute

'Dirty water' swales/drains collect all incident rainwater that falls on the development infrastructure and drain into the silt traps/ponds. Following a period of attenuation, during which time all suspended solids will have 'fallen', the treated water is dispersed across vegetation (through buffered outfalls) to further filter the discharge. Dispersal in this manner has the effect of allowing the smaller particle sizes to be taken up by the vegetation.

## 4.2 Design Measures

This SuDS adopts a design for the drainage of the site. The following elements in series are proposed:-

- Areas of ground to be disturbed should be kept to the minimum required;
- Where forestry is to be felled, stumps should be left in the ground (apart from areas for access tracks, site drainage, hardstands and turbine foundations) so as to minimise ground disturbance;
- Open swales for development run-off collection and treatment;
- Infiltration Interception Drains for upslope 'clean' water collection and dispersion;
- Ditches which drain from the 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;
- Filtration Check Dams will be installed to reduce velocities along sections of road which run perpendicular to contours;
- Silt/settlement ponds and lagoon-type sediment traps will control and store development runoff to encourage settlement prior to discharge, at greenfield runoff rates, to eliminate any risk to Freshwater Pearl Mussel downstream of the project; and
- Disturbed Sediment Entrainment Mats (SEDIMATS) in all watercourses draining the site (including areas to be clear felled of commercial forestry), to provide further level of protection in relation to silt release.

These measures will provide a comprehensive surface water management train that will avoid any adverse effect on the hydrology of the site and downstream water quality during the construction phase of the project.

### 4.2.1 Infiltration Interceptor Drains

Drainage management will ensure that natural runoff is not permitted to mix with construction runoff from sources such as excavation dewatering or access track

runoff. The SuDS design will ensure that infiltration interceptor drains are installed upslope of infrastructure, to intercept and divert clean surface water runoff, prior to it coming in contact with areas of excavation. The contractor will ensure that natural runoff infiltration interceptor drains are installed ahead of earthworks being undertaken.

The purpose of cut-off drainage is to collect clean run-off water on the upstream side of new infrastructure and transfer it such that it can discharge to the downstream side of infrastructure without having to interact with new infrastructure/excavations where it could potentially pick up fine particles.

This will reduce the flow of natural runoff onto any exposed areas of rock and soil, thereby reducing the volume of silt laden runoff capable of being generated at the project site. Natural runoff water, upslope of infrastructure, will be collected in infiltration interceptor drains and be directed away from the earthworks etc. In certain areas, runoff will be passed through sub-surface clean water culverts (e.g. below access tracks or hardstandings) and will be kept separate to drainage provided for track runoff. The clean water runoff will be discharged downstream of works location and returned to the natural drainage network.

Temporary silt/sediment prevention and erosion protection measures will be provided in all drainage installed in order to mitigate the possibility of erosion and transport of sediment from newly excavated channels which will be formed as part of the construction runoff drainage provisions. All drainage is to be dispersed over vegetated ground as a further filtration method.

The frequency of outflow points will be designed to avoid collection and interception of large catchments creating significant point flows.

#### 4.2.2 Swales

Where swales are utilised, it is proposed that rock filled check dams will be installed at a regular frequency, in order to reduce flow velocities and improve conditions for the settlement of solids in transit. Check dams will be constructed from 5-40mm crushed rock locally won, and will constitute the majority of the check dams.

It is intended that these dams will be relatively simple to construct but will provide treatment of construction runoff at source. There will be outflow points from the swales to the existing drainage network to preserve the hydraulic efficiency of the site and to prevent ponding of water. No outflow will be permitted directly into natural watercourses.

#### 4.2.3 Filtration Check Dams

The project includes areas where infrastructure and accompanying swales run directly downhill. In such situations, appropriate flow attenuation measures will be installed.

Access tracks will be constructed with an appropriate surface cross slope, so that all storm water flow will be directed towards the constructed grass swales located along track verges. The width and depth of constructed swales will be minimised as far as practical in order to reduce ground disturbance, excavation footprint (and hence volume of excavated materials) and also disruption of local hydrology as far as possible.

Check dams (flow barriers or dams constructed across the drainage channel) will be installed at regular intervals within clean water drains and dirty water swales in order to reduce erosion and allow for greater flow control. Check dams allow for a

reduction in the velocity of water and therefore allow settlement of coarser sediment particles as well as silt at low flow conditions. Reduction in flow velocity will also prevent erosion of the drainage channel itself.

The number and location of check dams will be dependent on the slope, flow and volume of water, although the following general rules will be applied:

- The maximum spacing between check dams should be such that the toe of the upstream dam is at the same elevation as the top of the downstream dam;
- The centre of the check dam should be at least 0.2m lower than the outside edges;
- Side slopes should be 1:2 or less;
- Check dams should be keyed at least 0.1m into the drainage channel bottom in order to prevent the dam washing out; and
- Check dams will be maintained and monitored on a regular basis. Sediment should be removed before it reaches one half the original dam height.

#### 4.2.4 Silt/Settlement Ponds

Runoff from large areas of hardstanding; including crane hardstandings, temporary construction compound, and electrical substation compound; will be attenuated to mimic natural runoff patterns. To capture runoff generated within the project site, swales (see **Section 4.2.2**) will be utilised to attenuate water and to direct 'dirty' water to silt/settlement ponds, where the flow velocity will reduce to allow sediment and silt to be deposited.

From the silt/settlement ponds, the water will flow through a tertiary treatment system; based on a design from Altmuller and Dettmer (2006); of lagoon-type sediment pond which will absorb the fine particles that may not settle in the primary and secondary settlement ponds.

All swales and ponds will be kept as shallow as possible so that they pose no health and safety risk to plant or personnel. Maximum depth of standing water will be limited to 0.75m within the settlement ponds.

The settlement ponds are utilised to attenuate rain water runoff rates to that of existing green field rates. In addition, the ponds shall aid the removal of suspended solids from runoff water.

#### 4.2.5 Lagoon-type Sediment Ponds

In addition to the silt/settlement ponds, a tertiary treatment system will also be provided to absorb any fine particles that may not settle in the primary and secondary settlement ponds. From the silt/settlement ponds, water will flow through lagoon-type sediment ponds which will be designed with a retention time of 10-days. These ponds; the design of which will be adapted to the characteristics of the project site but based on the principles of Altmuller & Dettmer; will be vegetated so as to perform the role of a 'plant filtration bed' as described at **Annex 1** (pg. 7).

The project site is located in the catchment of the specified Freshwater Pearl Mussel (FPM) populations as set out in First Schedule of the European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009. Sedimentation poses a significant threat to the FPM which is the qualifying interest of the River Barrow and River Nore Special Area of Conservation (SAC). All surface water run-off shall be strictly controlled such that no silt or other pollutants enter watercourses and that no artificially elevated levels of downstream siltation or no plumes of silt arise, in accordance with the Fourth Schedule of the Regulations.

The settlement ponds and lagoon-type sediment traps will assist as part of an overall strategy to remove any risk to FPM downstream of the project site.

Separately, it is also proposed to use Disturbed Sediment Entrainment Mats - SEDIMATS (see [http://www.hy-tex.co.uk/ht\\_bio\\_sed.html](http://www.hy-tex.co.uk/ht_bio_sed.html)). The use of these mats will provide a further level of protection in relation to silt release.

#### 4.2.6 Planning-Stage Design of Surface Water Management System

A planning-stage drainage/surface water management system has been designed by Jennings O'Donovan & Partners, enclosed at **Annex 2** hereto, and includes preliminary specifications for surface water management infrastructure particularly in relation to the appropriate sizing of silt/settlement ponds. Details of the sizing of each silt/settlement pond, which have been informed by rainfall data for the project site (see **Annex 3**), are provided at **Table 1** below.

Pond Reference (SP)	Development Area (m <sup>2</sup> )	Length (m)	Width (m)	Depth (m)	Overall Volume of Silt Pond (m <sup>3</sup> )	Settling Velocity m/s <0.0016	Settling Duration Hours >4hrs
1	736	8.1	2.8	0.75	17.0	0.0003	7.09
2	791	9	2.8	0.75	18.9	0.0003	7.33
3	1,314	14.5	2.8	0.75	30.5	0.0006	7.11
4	688	7.6	2.8	0.75	16.0	0.0003	7.12
5	949	10.5	2.8	0.75	22.1	0.0004	7.13
6	1,846	15.8	3.6	0.75	42.7	0.0006	7.09
7	579	6.5	2.8	0.75	13.7	0.0002	7.24
8	628	7	2.8	0.75	14.7	0.0003	7.18
9	2,060	17.7	3.6	0.75	47.8	0.0007	7.12
10	3,024	20.7	4.5	0.75	69.9	0.0008	7.09
11	4,507	20	5.2	1	104.0	0.0008	7.08
12	4,526	20.1	5.2	1	104.5	0.0008	7.09
13	3,024	20.7	4.5	0.75	69.9	0.0008	7.09
14	760	8.5	2.8	0.75	17.9	0.0003	7.21
15	2,108	18	3.6	0.75	48.6	0.0007	7.08
16	1,005	11.1	2.8	0.75	23.3	0.0004	7.12
17	3,321	22.7	4.5	0.75	76.6	0.0009	7.08
18	2,868	19.7	4.5	0.75	66.5	0.0008	7.12
19	1,095	12.1	2.8	0.75	25.4	0.0005	7.12
20	700	7.8	2.8	0.75	16.4	0.0003	7.18
21	986	8.6	2.8	0.75	18.1	0.0004	5.62
22	484	8	2.8	0.5	11.2	0.0003	7.10
23	4,042	18	5.2	1	93.6	0.0007	7.11

24	3,665	16.3	5.2	1	84.8	0.0006	7.10
25	3,139	21.5	4.5	0.75	72.6	0.0008	7.10
26	3,082	21.5	4.5	0.75	72.6	0.0008	7.23
27	3,780	16.8	5.2	1	87.4	0.0007	7.09
28	968	11	2.8	0.75	23.1	0.0004	7.32
29	1,087	12.1	2.8	0.75	25.4	0.0005	7.18
30	1,947	16.6	3.6	0.75	44.8	0.0007	7.07
31	2,434	16.6	4.5	0.75	56.0	0.0007	7.06
32	3,576	16	5.2	1	83.2	0.0006	7.14
33	180	3	2.8	0.5	4.2	0.0001	7.16
34	1,475	12.8	3.6	0.75	34.6	0.0005	7.19
35	608	7	2.8	0.75	14.7	0.0003	7.42
36	1,579	13.5	3.6	0.75	36.5	0.0005	7.09
37	3,083	21.5	4.5	0.75	72.6	0.0008	7.22
38	2,260	19.5	3.6	0.75	52.7	0.0008	7.15
39	862	9.5	2.8	0.75	20.0	0.0004	7.10
40	2,535	17.4	4.5	0.75	58.7	0.0007	7.11
41	6,650	22	6	1.2	158.4	0.0008	7.31
42	8,300	23	6	1.4	193.2	0.0009	7.14
43	3,150	16.5	4.5	1	74.3	0.0006	7.23
44A	7,260	22	6	1.4	184.8	0.0008	7.81
44B	4,840	22	5.2	1	114.4	0.0008	7.25
45	7,300	24	6	1.2	172.8	0.0009	7.27
46	1,800	16	3.6	0.75	43.2	0.0006	7.37
47	2,950	20	4.5	0.75	67.5	0.0008	7.02
48	650	12	3.6	0.75	32.4	0.0002	15.30
49A	400	5	2.8	0.75	10.5	0.0002	8.06
49B	350	5	2.8	0.75	10.5	0.0002	9.21
50	700	8	2.8	0.75	16.8	0.0003	7.37
51	450	5	2.8	0.75	10.5	0.0002	7.16
52	4,200	19	5.2	1	98.8	0.0007	7.22
53	10,200	20	8	1.5	240.0	0.0008	7.22
54	3,800	17	5.2	1	88.4	0.0007	7.14
55	8,600	22.5	6	1.5	202.5	0.0009	7.23
56	14,300	25	9	1.5	337.5	0.0010	7.24
57	4,000	18	5.2	1	93.6	0.0007	7.18

58	450	5	2.8	0.75	10.5	0.0002	7.16
59	300	5	2.8	0.75	10.5	0.0001	10.74

**Table 1: Silt/Settlement Pond Specifications**

Prior to the commencement of development, the appointed contractor; in conjunction with the project design team, EM, and ECoW; shall prepare a detailed SWMP which shall detail the precise specifications and locations of all surface water management infrastructure to be installed.

## 5.0 Construction Phase Measures

In the first instance, the project seeks to avoid adverse effects on surface water through avoidance. In particular, the project has sought to avoid direct interactions with watercourses; through minimising the number of watercourse crossings and the implementation of a 50m buffer zone around natural watercourses. The design of the project has, where possible, sought to avoid this buffer area.

Best practice measures are also proposed to minimise impacts to water quality, as follows:-

- All site personnel will be made aware of their environmental responsibilities at the site;
- Contractors will be required to include contingency plans to deal with spillages, should they occur;
- Land disturbance will be kept to minimum and disturbed areas will be stabilised as soon as possible;
- In principle, soil excavation should be undertaken during dry periods, whenever possible;
- Site visits by a Design Engineer will be undertaken at various stages of the construction process to ensure that the SuDS scheme is being constructed and implemented appropriately; and
- In order to verify the efficacy of pollution prevention works during construction, water quality monitoring will be undertaken by a suitably qualified EM, prior to, during and post completion of construction works. This will include all watercourses within the catchment of the construction area. The monitoring will comprise visual and hydrochemistry monitoring, as described in detail in the Water Quality Monitoring Plan.

Finally, all mitigation measures proposed in the Water chapter of the EIAR will be implemented in full, as set out in the following sections.

### 5.1 Clear Felling & Surface Water Quality Effects

Best practice methods related to water incorporated into the forestry management and mitigation measures have been derived from:-

- Department of Agricultural, Food and the Marine (2019) *Standards for Felling and Reforestation*;
- Forestry Commission (2004) *Forests and Water Guidelines, Fourth Edition*. Publ. Forestry Commission, Edinburgh;
- Coillte (2009) *Forest Operations and Water Protection Guidelines*;
- Forest Services (Draft) *Forestry and Freshwater Pearl Mussel Requirements – Site Assessment and Mitigation Measures*;
- Coillte (2009) *Methodology for Clear Felling Harvesting Operations*; and,

- Forest Service (2000: *Forestry and Water Quality Guidelines*. Forest Service, DAF, Johnstown Castle Estate, Co. Wexford.

### 5.1.1 Mitigation by Avoidance

There is a requirement in the *Forest Service Code of Practice* and in the *FSC Certification Standard* for the installation of buffer zones adjacent to aquatic zones at planting stage. Minimum buffer zone widths recommended in the Forest Service (2000) guidance document *Forestry and Water Quality Guidelines* are detailed below.

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

During the construction phase, a self-imposed conservative buffer zone of 50m will be maintained for all streams.

The large distance between the majority of the felling areas and sensitive aquatic zones means that any poor quality runoff arising from felling areas can be adequately managed and attenuated prior to even reaching the aquatic buffer zone and primary drainage routes. Where tree felling is required in the vicinity of streams, the additional mitigation measures outlined below will be employed.

### 5.1.2 Mitigation by Design

Mitigation measures which will reduce the risk of entrainment of suspended solids and nutrient release in surface watercourses comprise best practice methods, as follows:-

- Machine combinations (i.e. handheld or mechanical) will be chosen which are most suitable for ground conditions and which will minimise soils disturbance;
- Checking and maintenance of tracks and culverts will be ongoing through any felling operation. No tracking of vehicles through watercourses will occur. Where possible, existing drains will not be disturbed during felling works;
- Ditches which drain from the areas 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 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 spoil disposal areas. 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 50m buffer is required, it will be necessary to install double or triple sediment traps;
- All drainage channels will taper out before entering the 50m 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;
- Brush mats will be used to support vehicles on soft ground, reducing topsoil and mineral soils erosion and avoiding the formation of rutted areas, in which surface water ponding can occur. Brush mat renewal will take place before they become heavily used and worn. Provision will be made for brush mats along all off-road routes, to protect the soil from compaction and rutting. Where there is risk of severe erosion occurring, extraction will be suspended during periods of high rainfall;
- Timber will be stacked in dry areas, and outside the 50m watercourse buffer. Straw bales and check dams will 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/tracks and culverts will be ongoing through the felling operation;
- 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;
- 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;
- Trees will be cut manually from along streams and using machinery to extract whole trees; and
- Travel will only be permitted perpendicular to and away from surface water features.

#### 5.1.2.1 Silt Traps

Silt traps will be strategically placed down-gradient within forestry drains near streams. The main purpose of the silt traps and drain blocking is to slow water flow, increase residence time and allow settling of silt in a controlled manner.

#### 5.1.2.2 Drain Inspection and Maintenance

The following items will be carried out during pre-felling inspections and regularly thereafter:-

- Communication with tree felling operatives in advance to determine whether any areas have been reported where there is unusual waterlogging or bogging of machines;
- Inspection of all areas reported as having unusual ground conditions;
- Inspection of main drainage ditches and outfalls. During pre-felling inspections, the main drainage ditches will be identified. Where possible, the pre-felling inspection will be carried out during rainfall;
- Following tree felling, all main drains will be inspected to ensure that they are functioning;
- Extraction tracks within 10m of drains will be broken up and diversion channels created to ensure that water in the tracks spreads out over the adjoining ground;

- Culverts on drains exiting the site, if impeded by silt or debris, will be unblocked; and
- All accumulated silt will be removed from drains and culverts, and silt traps, and this removed material will be deposited away from watercourses to ensure that it will not be carried back into the trap or stream during subsequent rainfall.

### 5.1.2.3 Surface Water Quality Monitoring

Sampling will be completed before, during (if the operation is conducted over a protracted time) and after the felling activity. The 'before' sampling will be conducted within 4-weeks of the felling activity commencing, preferably in medium-to-high water flow conditions. The 'during' sampling will be undertaken once a week or after rainfall events. The 'after' sampling will comprise as many samplings as necessary to demonstrate that water quality has returned to pre-activity status (i.e. where an impact has been shown).

Details of the proposed surface water quality monitoring programme are outlined in the Water Quality Monitoring Plan.

The surface water sampling locations used in this EIAR for the wind farm site (i.e. SW1 – SW2) will also be used as sampling locations during felling activities.

Also, daily surface water monitoring forms (for visual inspections and field chemistry measurements) will also be utilised at every works site near any watercourse. These will be taken daily and kept on site for record and inspection.

## 5.2 Earthworks (Removal of Vegetation Cover, Excavations and Stock Piling) Resulting in Suspended Solids Entrainment in Surface Water

### 5.2.1 Mitigation by Avoidance

The key mitigation measure during the construction phase is the avoidance of sensitive aquatic areas by using a 50m buffer

Specific mitigation measures, incorporated into the design of the project and through implementation of best practice methodologies (discussed below) will be employed where work inside buffer zones is proposed.

The generally large setback distance from sensitive hydrological features ensures that sufficient space is provided for the installation of drainage mitigation measures (discussed below) and to ensure their effective operation. The proposed buffer zone will ensure:-

- Avoidance of physical damage to watercourses, and associated release of sediment;
- Avoidance of excavations within close proximity to surface water courses;
- Avoidance of the entry of suspended sediment from earthworks into watercourses; and,
- Avoidance of the entry of suspended sediment from the construction phase drainage system into watercourses, achieved in part by ending drain discharge outside the buffer zone and allowing percolation across the vegetation of the buffer zone.

### 5.2.2 Mitigation by Prevention

The following section details the measures which will be put in place during the construction phase to ensure that surface water features are protected from the release of silt or sediment and to ensure that all surface water runoff is fully treated and attenuated to avoid the discharge of dirty water.

Source controls to limit the likelihood for 'dirty water' to occur:-

- Interceptor drains, vee-drains, diversion drains, flume pipes, erosion and velocity control measures such as use of sand bags, oyster bags filled with clean washed gravel, filter fabrics, and other similar/equivalent or appropriate systems;
- Small working areas, covering stockpiles, weathering off stockpiles, cessation of works in certain areas or other similar/equivalent or appropriate measures.

In-Line controls to ensure appropriate management of silt laden water:-

- Interceptor drains, vee-drains, oversized swales, erosion and velocity control measures such as check dams, sand bags, oyster bags, straw bales, flow limiters, weirs, baffles, silt bags, silt fences, sedimats, filter fabrics, and collection sumps, temporary sumps/attenuation lagoons, sediment traps, pumping systems, settlement ponds, temporary pumping chambers, or other similar/equivalent or appropriate systems.

Treatment systems to fully attenuate silt laden waters prior to discharge:-

- Temporary sumps and attenuation ponds, temporary storage lagoons, sediment traps, and settlement ponds, and proprietary settlement systems such as Siltbuster, and/or other similar/equivalent or appropriate systems; and
- Final tertiary treatment lagoons which follow a design outlined by Altmuller and Dettmer (2006).

It should be noted for this site that an extensive network of land and forestry drains already exists and these will be integrated and enhanced as required and used within the wind farm drainage system. The integration of the existing land drainage network and the proposed wind farm network is common practice in wind energy developments and will also result in benefits to surrounding agricultural lands.

The main elements of interaction with existing drains will be as follows:-

- Apart from interceptor drains, which will convey clean runoff water to the downstream drainage system, there will be no direct discharge (without treatment for sediment reduction and attenuation for flow management) of runoff from the wind farm drainage into the existing site drainage network. This will reduce the likelihood of any increased risk of downstream flooding or sediment transport/erosion;
- Silt traps will be placed in the existing drains upstream of any streams where construction works is taking place, and these will be diverted into proposed interceptor drains, or culverted under/across the works area; and
- Buffered outfalls, which will be numerous over the site, will promote percolation of drainage waters across vegetation and close to the point at which the additional runoff is generated, rather than direct discharge to the existing drains of the site.

#### 5.2.2.1 Water Treatment Train

While the primary, secondary and tertiary silt/sediment ponds and lagoons are assessed as providing a sufficient level of protection to avoid any deterioration in downstream water quality; a final line of defence can be provided by a water treatment train such as a 'Siltbuster', if required. 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 water treatment train will apply for the entirety of the construction phase.

#### 5.2.2.2 Silt Fences

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 watercourses 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 of these structures during construction phase is critical to their functioning to stated purpose. They will remain in place throughout the entire construction phase. Double silt fences will be emplaced within drains down-gradient of all construction areas inside the hydrological buffer zones to provide an additional layer of protection in these areas.

#### 5.2.2.3 Silt Bags

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, most of the sediment is retained by the geotextile fabric allowing filtered water to pass through. Silt bags will be used with natural vegetation filters or sedimats (sediment entrapment mats, consisting of coir or jute matting) placed at the silt bag location to provide further treatment of the water outfall from the silt bag. Sedimats will be secured to the ground surface using stakes/pegs. The sedimat will extend to the full width of the outfall to ensure all water passes through this additional treatment measure.

#### 5.2.2.4 Tertiary Treatment System/Lagoons

In addition to the silt/settlement ponds, a tertiary treatment system will also be provided to remove any fine particles that may not settle in the primary and secondary settlement ponds. From the silt/settlement ponds, water will flow through lagoon which will be designed with a retention time of 10-days. These ponds; the design of which will be adapted to the characteristics of the project site but based on the principles of Altmuller & Dettmer (2006); will be vegetated so as to perform the role of a 'plant filtration bed'.

#### 5.2.2.5 Management of Runoff from Soil Deposition Areas

It is proposed that excavated overburden/spoil will be utilised for reinstatement of excavated areas etc. and for landscaping purposes. Excess material, or material which is unsuitable for this purpose, will be stored, permanently, at 2 no. dedicated spoil deposition areas and in the 3 no. spent borrow pits (if developed).

Both proposed spoil deposition areas and all borrow pits are located outside the 50m stream buffer zone.

During the initial placement of spoil in the deposition areas, silt fences, straw bales and biodegradable matting will be used to control surface water runoff. Drainage from overburden deposition areas will ultimately be routed to an oversized swale and a number of silt/settlement ponds (and lagoons) with appropriate storage and settlement capacity, designed for a '1-in-100 year 6-hour return' period, before being discharged.

Spoil deposition areas will be sealed with a digger bucket and vegetated as soon possible to reduce sediment entrainment in runoff. Once re-vegetated and stabilised, spoil deposition areas will no longer be a likely source of silt laden runoff. Surface water protection infrastructure will be left in place until the areas have stabilised.

#### 5.2.2.6 Grid Connection Installation Works

Temporary silt fencing/silt trap arrangements will be placed within existing roadside/field drainage features along the grid connection route to remove any suspended sediments from the works area. The trapped sediment will be removed and disposed of at an appropriate licenced facility. Any bare-ground will be re-seeded/reinstated immediately and silt fencing temporarily left in place if necessary.

#### 5.2.2.7 Directional Drilling

The following mitigation will be carried out during directional drilling works:-

- The works area will be clearly marked out with fencing or flagging tape to avoid unnecessary disturbance of vegetation;
- A minimum 10m buffer zone will be maintained between disturbed areas and the watercourse bank. There will be no storage of material/equipment, excavated material (see below) or overnight parking of machinery inside the 10m buffer zone;
- Double silt fencing will be placed upslope of the buffer zone on each side of the watercourse.
- Temporary storage of excavated material will be undertaken outside of the 10m buffer on flat ground or within a local hollow area. A containment berm will be placed downslope of the excavated material which in turn will be surrounded by secondary silt fence protection to prevent saturated soil from flowing back into the watercourse;
- Operation of machinery and use of equipment within the 10m buffer will be kept to a minimum to avoid any unnecessary disturbance;
- There will be no refuelling allowed within 100m of the watercourse crossing;
- All plant will be checked for purpose of use prior to mobilisation at the watercourse crossing; and
- Works shall not take place during periods of heavy rainfall and will be scaled back or suspended if heavy rain is forecasted.

Measures relating to the use of a mixture of a natural, inert and fully biodegradable drilling fluid such as Clear Bore™ and water for directional drilling include:-

- The area around the Clear Bore™ batching, pumping and recycling plants will be bunded using terram and sandbags in order to contain any spillages;
- One or more lines of silt fences will be placed between the works area and adjacent rivers and streams on both banks;
- Accidental spillage of fluids will be cleaned up immediately and transported off site for disposal at a licensed facility; and,
- Adequately sized skips will be used for temporary storage of drilling arisings during directional drilling works. This will ensure containment of drilling arisings and drilling flush.

#### 5.2.2.8 Pre-emptive Site Drainage Management

The works programme for the initial construction stage of the development will also take account of weather forecasts, and predicted rainfall in particular. Large excavations and movements of soil/subsoil or vegetation stripping will be suspended or scaled back if prolonged or intense rain is forecast. The extent to which works will be scaled back or suspended will relate directly to the amount of rainfall forecast.

The following forecasting systems are available and will be used on a daily basis at the site to direct proposed construction activities:-

- General Forecasts: Available on a national, regional and county level from the Met Eireann website ([www.met.ie/forecasts](http://www.met.ie/forecasts)). These provide general information on weather patterns including rainfall, wind speed and direction but do not provide any quantitative rainfall estimates;
- Meteo Alarm: Alerts to the possible occurrence of severe weather for the next 2 days. Less useful than general forecasts as only available on a provincial scale;
- 3 hour Rainfall Maps: Forecast quantitative rainfall amounts for the next 3 hours but does not account for possible heavy localised events;
- Rainfall Radar Images: Images covering the entire country are freely available from the Met Eireann website ([www.met.ie/latest/rainfall\\_radar.asp](http://www.met.ie/latest/rainfall_radar.asp)). The images are a composite of radar data from Shannon and Dublin airports and give a picture of current rainfall extent and intensity. Images show a quantitative measure of recent rainfall. A 3 hour record is given and is updated every 15 minutes. Radar images are not predictive; and,
- Consultancy Service: Met Eireann provide a 24 hour telephone consultancy service. The forecaster will provide interpretation of weather data and give the best available forecast for the area of interest.

Using the safe threshold rainfall values will allow work to be safely controlled (from a water quality perspective) in the event of an impending high rainfall intensity event.

Works will be suspended if forecasting suggests either of the following is likely to occur:-

- >10 mm/hr (i.e. high intensity local rainfall events);
- >25 mm in a 24-hour period (heavy frontal rainfall lasting most of the day); or,
- >half monthly average rainfall in any 7 days.

Prior to works being suspended the following control measures will be completed:-

- Secure all open excavations;
- Provide temporary or emergency drainage to prevent back-up of surface runoff; and,
- Avoid working during heavy rainfall and for up to 24-hours after heavy events to ensure drainage systems are not overloaded.

#### 5.2.2.9 Timing of Site Construction Works

The construction of the site drainage system will be carried out, at the respective locations, prior to other activities being commenced. The construction of the drainage system will only be carried out during periods of, where possible, no rainfall, therefore avoiding runoff. This will avoid the risk of entrainment of suspended sediment in surface water runoff, and transport via this pathway to surface watercourses. Construction of the drainage system during this period will also ensure that attenuation features associated with the drainage system will be in place and functional for all subsequent construction works.

#### 5.2.3 Monitoring

Prior to the commencement of development, a detailed Site Drainage Plan and SWMP will be prepared to detail the siting and composition of the surface water management measures. The respective plans, which will form part of a detailed CEMP, will be prepared prior to the commencement of development.

The CEMP will also include a detailed Water Quality Monitoring Plan for the monitoring of surface waters in the vicinity of the construction site by a designated Environmental Manager. The monitoring programme will comprise field testing and laboratory analysis of a range of agreed parameters. The civil works contractor, who will be

responsible for the construction of the site drainage system, and Environmental Manager will undertake regular inspections of the drainage system to ensure that all measures are functioning effectively. The surface water sampling locations used in this EIA (i.e. SW1 – SW4) will be used during construction activities. 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.

Any excess build-up of silt levels that may decrease the effectiveness of the drainage feature, will be removed and disposed of in an appropriate manner.

### 5.3 Excavation Dewatering and Effects on Surface Water Quality

The management of excavation dewatering (pumping), particularly in relation to any accumulation of water in foundations or electricity line trenches, and subsequent treatment prior to discharge into the drainage network will be undertaken as follows:-

- Appropriate interceptor drainage, to prevent upslope surface runoff from entering excavations, will be put in place;
- The interceptor drainage will be discharged to the site constructed drainage system or onto natural vegetated surfaces and not directly to surface waters to ensure that Greenfield runoff rates are mimicked;
- If required, pumping of excavation inflows will prevent build-up of water in the excavation;
- The pumped water volumes will be discharged via volume and silt/sediment ponds and settlement lagoons adjacent to excavation areas, or via specialist treatment systems such as a Siltbuster unit;
- There will be no direct discharge to surface watercourses, and therefore no risk of hydraulic loading or contamination will occur;
- Daily monitoring of wind farm excavations by the Environmental Manager will occur during the construction phase. If high levels of seepage inflow occur, excavation work at this location will cease immediately and a geotechnical assessment undertaken; and,

A mobile 'Siltbuster' or similar equivalent specialist treatment system will be available on-site for emergencies. Siltbusters are mobile silt traps that can remove fine particles from water using a proven technology and hydraulic design in a rugged unit. The mobile units are specifically designed for use on construction-sites. They will be used as final line of defence if needed.

### 5.4 Groundwater Levels and Local Well Supplies During Excavation Works

Mitigation measures with regard effects on groundwater levels and local well supplies will not be required for the reasons explained below.

The borrow pits at the wind farm site are located in bedrock (shales/sandstones) which is generally unproductive in terms of groundwater flow. No groundwater dewatering will be required as rock excavation will progress in a horizontal manner into the side of subcrop/shallow bedrock on the hill side.

The topographical and hydrogeological setting of the borrow pit locations means no significant groundwater dewatering will be required. Moreover, direct rainfall and surface water runoff will be the main inflows that will require water volume and water quality management. For the avoidance of doubt, dewatering is generally defined as a requirement to temporarily drawdown the local groundwater table by means of over pumping (for example, as would be required for the operation of a bedrock

quarry in a valley floor). This example is very different in scale and operation from the development of a temporary shallow borrow pit such as that proposed, as follows:-

- The borrow pits are located at locally elevated areas where ground elevations are between 220m and 285m OD and the rock is shallow;
- These elevations are above the elevations of the local valleys and streams;
- The borrow pits will be between approximately 6m and 8m below ground level. In the context of the topographical/elevated/subcrop setting of the borrow pits, this depth range is relatively shallow;
- The local bedrock comprises shales/sandstones and is known to be generally unproductive. This means that groundwater flows will be relatively minor;
- The flow paths (i.e. the distance from the point of recharge to the point of discharge) in this type of geology is short, localised, and will also be relatively shallow;
- No regional groundwater flow regime (i.e. large volumes of groundwater flow) will be encountered at these elevations;
- Groundwater inflows will largely be fed by rainfall and by limited groundwater seepage from localised shallow bedrock; and
- The sloping nature of the wind farm site where the borrow pits are proposed along with the coverage of peaty topsoil means groundwater recharge will be low.

Consequently, the groundwater flow system will be small in comparison to the expected surface water flows from the ground surface. As a result, there will be a preference for surface water runoff as opposed to groundwater recharge and flow; and, accordingly, it is assessed that the management of surface water will form the largest proportion of water to be managed and treated.

In conclusion, therefore, it is assessed that the project will not impact in any way on any local groundwater wells/springs for the following reasons:-

- The site is underlain by low permeability bedrock;
- Groundwater flowpaths are therefore typically very short (30-300m);
- The majority of groundwater flows within the site emerge as springs/baseline along streams/rivers and leave the site as surface water flows and not groundwater flows; and
- The likelihood of effects on local wells (whether they are downslope or not) is very low as groundwater flowpaths between wind farm infrastructure and local wells typically do not exist due to the large setback distance (>450m).

Therefore, the risk of significant effects on local wells/water supply sources is very low.

#### 5.4.1 Mitigation by Best Practice

Environmental management guidelines from the EPA guidance document *Environmental Management in the Extractive Industry* in relation to groundwater protection will be implemented during the construction phase, particularly the best practice measures relating to oil and fuels.

#### 5.5 Release of Hydrocarbons during Construction and Storage

Mitigation measures proposed to avoid release of hydrocarbons at the site are as follows:-

- The volume of fuels or oils stored on site will be minimised. All fuel and oil will be stored in an appropriately bunded area within the temporary construction compound. Only an appropriate volume of fuel will be stored at any given time.

The bunded area will be roofed to avoid the ingress of rainfall and will be fitted with a storm drainage system and an appropriate oil interceptor;

- All bunded areas will have 110% capacity of the volume to be stored;
- On site refuelling 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 at the temporary compound and will be towed around the site by a 4x4 jeep to where plant and machinery is located. No refuelling will be permitted at works locations within the 50m hydrological buffer. The 4x4 jeep will also be fully stocked with 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 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 to avoid any accidental leakages;
- All plant and machinery used during construction will be regularly inspected for leaks and fitness for purpose;
- Spill kits will be readily available to deal with and accidental spillages; and
- All waste tar material arising from road cuttings (from trenching or other works in public roads) will be removed off-site and taken to a licensed waste facility. Due to the potential for contamination of soils and subsoils, it is not proposed to utilise this material for any reinstatement works.

#### 5.6 Groundwater and Surface Water Contamination from Wastewater Disposal

Measures to avoid contamination of ground and surface waters by wastewaters will comprise:-

- Self-contained port-a-loos (chemical toilets) with an integrated waste holding tank will be installed at the site compound, maintained by the providing contractor, and removed from site on completion of the construction works;
- Water supply for the site office and other sanitation will be brought to site and removed after use to be discharged at a suitable off-site treatment location; and,
- No water will be sourced on the site, nor will any wastewater be discharged to the site.

#### 5.7 Release of Cement-Based Products

The following mitigation measures are proposed to ensure that the release of cement-based products is avoided:-

- No batching of wet-cement products will occur on site. Ready-mixed concrete will be brought to site as required and, where possible, emplacement of pre-cast products, will take utilised;
- All watercourse crossings will utilise pre-cast products and the use of wet-cement products within the hydrological buffer will be avoided
- Where concrete is delivered on site, only the chute will be cleaned, using the smallest volume of water practicable. Chute cleaning will be undertaken at lined cement washout ponds with waters being stored in the temporary construction compound, removed off site and disposed of at an approved licensed facility. No discharge of cement contaminated waters to the construction phase drainage system or directly to any artificial drain or watercourse will be allowed;
- Weather forecasting will be used to ensure that prolonged or intense rainfall is not predicted during concrete pouring activities; and

- The concrete pour site will be kept free of standing water and plastic covers will be ready in case of sudden rainfall event.

## 5.8 Morphological Changes to Surface Water Courses & Drainage Patterns

The following mitigation measures are proposed:-

- All proposed new stream crossings will be clear span bridges (bottomless culverts) and the stream beds will remain undisturbed. No in-stream excavation works at the crossing locations are proposed and therefore there will be no impact on the stream at the proposed crossing location;
- Where internal wind farm electrical cabling or grid connection cabling will pass above or below the existing culvert and will not directly interfere with the culvert;
- At the time of construction, all guidance/best practice requirements of the Office of Public Works (OPW) or Inland Fisheries Ireland will be incorporated into the design/construction of the proposed watercourse/culvert crossings;
- As a further precaution, in-stream construction work (if/where required) will only be carried out during the period permitted by Inland Fisheries Ireland for in-stream works according to *Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters (2016)* (i.e., July 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 (any deviation from this will be done in discussion with the IFI);
- During the near stream construction works (i.e. within the 50m buffer zone), double row silt fences will be emplaced immediately down-gradient of the construction area for the duration of the construction phase;
- The 5 no. new watercourse crossings at the wind farm site will require a Section 50 license application to the OPW in accordance with the Arterial Drainage Act 1945. The river/stream crossings will be designed in accordance with OPW guidelines/requirements on applying for a Section 50 consent; and,
- No instream works are proposed at the grid connection watercourse crossings.

## 6.0 Operational Phase Measures

Following the completion of construction and the re-vegetation of disturbed ground, the generation of 'dirty' water runoff will be significantly diminished. It is important to reiterate that areas of hardstanding will be impermeable and the majority of incident rainfall will percolate naturally to ground.

Infiltration interceptor drains will be retained for the duration of the project to ensure that up-slope ('clean') runoff is directed away from site infrastructure and managed in an appropriate manner.

Swales and check dams (i.e. for the management of 'dirty' water) shall be retained for the duration of the project. The swales, having become vegetated, and check dams will act as a filtration feature for the low volume of surface water runoff arising and will be sufficient to ensure the avoidance of any deleterious matter being discharged to downstream watercourses. Accordingly, it is proposed that the silt/settlement ponds and lagoon-type sediment ponds will be decommissioned 1-year following the completion of construction. This period will ensure that the swales have become sufficiently vegetated to filter any silt/sediment which may arise.

The following measures will also be implemented.

## 6.1 Progressive Replacement of Natural Surface with Lower Permeability Surfaces

The operational phase drainage system of the project is described below:-

- Interceptor drains will be installed up-gradient of all 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 used to collect runoff from access tracks, turbine hardstanding areas and substation compound areas which may contain entrained suspended sediment, and channel it to settlement ponds for sediment settling;
- Transverse drains ('grips') will be constructed, where appropriate, in the surface layer of access tracks to divert any runoff into swales/track side drains;
- Check dams will be used along sections of access tracks drains to intercept silts at source. Check dams will be constructed from a 40mm non-friable crushed rock or similar;
- Swales and check dams 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; and,
- Settlement ponds will be designed in accordance the greenfield runoff rate requirements; and,
- Imported rock for construction purposes and road surfacing will be strong, well-graded limestone which will be resistant to erosion and have a low likelihood to generate fines in hardstand runoff.

The operation of the underground grid connection will not result in any likely hydrological or water quality effects and therefore do not require mitigation measures.

## 6.2 Hydrocarbons Spillages/Leakages

Mitigation measures relating to oils and fuels are as follows:-

- Fuels stored on site will be minimised. Any storage areas will be bunded appropriately for the fuel storage volume for the time period of the construction;
- The substation transformer and oil storage tanks will be located in a concrete bund, impervious to rainwater ingress, capable of holding 110% of the stored oil volume.
- Turbine transformers will be located within the turbines, and any leaks will be fully contained within the turbine thus eliminating any pathway for leakages to affect land and soil.
- Maintenance vehicles will be regularly inspected for leaks and fitness for purpose; and
- An emergency plan for the operational phase to deal with accidental spillages will be contained within an Operational-Phase Environmental Management Plan. Spill kits will be available to deal with accidental spillages.

## 7.0 Decommissioning Phase Measures

Prior to decommissioning works, a detailed Decommissioning Plan will be developed to detail the methods and measures to be adopted during that phase of works. The Decommissioning Plan will avail of, and implement, prevailing best practice measures including surface water protection methods.

It is likely that the methods adopted will be similar to those presented above in respect of the construction phase but of a reduced scale. Regardless of the specific practices and methods to be adopted; the overall objective will be the prevention of any silt, sediment or deleterious matter being discharged from the site such that could cause a deterioration in downstream water quality.

## **8.0 Conclusion**

This SWMP has been prepared to detail the practical implementation of surface water management infrastructure to address the requirements of measures set out in the EIA. This is a live document and will be updated by the appointed contractor prior to the commencement of development. Prior to the commencement of construction, the updated SWMP will be reviewed by the Environmental Manager (EM) and Ecological Clerk of Works (EcoW), as necessary, to confirm the appropriateness of the measures set out therein.

The SWMP incorporates the principles of SuDS; with the overall objective of ensuring that no silt, sediment or other material is discharged from the site to surrounding drainage features; to ensure that the project does not adversely affect the drainage regime within the project site and in its vicinity.

The proposed SuDS comprises drainage infrastructure to intercept and direct 'clean' incidental runoff away from works locations; and a separate surface water management train to effectively control manage and treat 'dirty' water runoff from the works areas. Given the connectivity of the project site to a designated conservation site for Freshwater Pearl Mussel, the surface water management train is supplemented by a further lagoon-type sediment ponds with a retention period of 10-days thus encouraging settlement of any silt/sediment prior to discharge.

The efficacy of the measures set out in this SWMP will be regularly monitored and will be supported by water quality monitoring as set out in the Water Quality Monitoring Plan.

**Annex 1 –  
Altmüller & Dettmer Research Paper**



## Foreword and acknowledgment

This pdf-file is the English version of an article which is published with three other articles dealing with species and biotope protection for the freshwater pearl mussel *Margaritifera margaritifera* in Lower Saxony, North Germany (see: [http://www.nlwkn.niedersachsen.de/master/C35794242\\_N14750639\\_L20\\_D0\\_I5231158.html](http://www.nlwkn.niedersachsen.de/master/C35794242_N14750639_L20_D0_I5231158.html)). With this pdf-file we want to give our non-German speaking colleagues an opportunity to read about the chance to do something for this endangered mussel species in Europe.

To get a good readable English text we are very glad to have our Irish friends and colleagues EVELYN MOORKENS and IAN KILLEEN on our side in our efforts to help *Margaritifera*, and we are very thankful to them for helping us in bringing our “Denglish” to a readable English version.

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## Successful species protection measures for the Freshwater Pearl Mussel (*Margaritifera margaritifera*) through the reduction of unnaturally high loading of silt and sand in running waters – Experiences within the scope of the Lutterproject -

by Reinhard Altmüller and Rainer Dettmer

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## 1 Introduction and Objectives

The conservation of freshwater pearl mussels [FPM] (*Margaritifera margaritifera*) and thick-shelled river mussels (*Unio crassus*) is a task of european importance (Habitats Directive, Water Framework Directive). This task can only be solved by cooperative efforts of all groups and institutions that are involved with running waters.

All conservation efforts in the past for these two mussel species were focused on maintaining high water quality. For the FPM it is a requirement as all known populations of FPM live only in running waters with the highest water quality. For the thick-shelled river mussel this requirement is as well documented by the fundamental investigations from HOCHWALD (1997). But the question does arise as to whether there are more important factors for the survival of the thick-shelled river mussel than water quality alone. This species was widely distributed in Lower Saxony, for example the river Weser from the city Hannoversch-Münden

(in the south of Lower Saxony) to the city of Bremen (367 km to the north) in very different ecological conditions.

For the FPM, we have been able to clearly demonstrate that in addition to the best water quality, a naturally very low level of fine sediments is characteristic to an intact, recruiting FPM environment. After leaving their host fish the young Freshwater Pearl mussels (only 0.5 mm long) live in the hollow system (=Interstitium) between gravel and stones, well protected against water current. The present day high amounts of input and load of fine materials in running waters resulting from current landuse clog up the interstitium and suffocate the typical freshwater organisms living there, including, the young FPM. Because of the failure of young mussels to survive, the FPM was threatened with extinction in the Lutter river and is threatened with extinction all over Europe in human populated regions. If the load of fine material is reduced to naturally occurring amounts, even brooks with overaged FPM populations can recover and numerous young mussels can survive and grow. This has been successfully demonstrated within the Lutterproject (ABENDROTH 1993, ALTMÜLLER & DETTMER 2000, ALTMÜLLER 2005). The Lutterproject is situated at the south edge of the Lüneburg Heath (Germany, Lower Saxony). It is a nature conservation project led by the counties of Celle and Gifhorn to restore the heather brook Lutter. The reason and main target organism is the freshwater pearl mussel. This very successful nature conservation project was made possible through the financial support of the German Federal Agency for Nature Conservation within the scope of its programme concerning riparian land (SCHERFOSE *et al.* 1996) by the Ministry for Environment of Lower Saxony and of the financial and manpower support of the counties of Celle and Gifhorn.

For successful measures to be taken to reduce unnaturally high sediment load it is necessary to know the origin of the sediment. Apart from the necessity to analyse the specific sediment origin throughout the catchment there are some general experiences and information knowledge. The experiences of unnaturally high loading in the Lutter catchment was reported by ALTMÜLLER & DETTMER (1996). The experiences of unnaturally high loading in the Lutter catchment was reported by ALTMÜLLER & DETTMER (1996). This paper showed that soil erosion and fish pond waste were important contributors to the high loading of fine sediments in running waters.

Since 1996 more knowledge and experience has been gained about the reasons for the unnaturally high load of fine material, which are described herein. All observations and measurements have been carried out to determine the reasons of the extreme sediment input to running waters and to find workable countermeasures.

## **2 Study of sediment levels entering the Lutter - an example from the Endeholz Ditch**

Within the scope of the measurement program „quantifying load of sand and mud in heather creeks“ a sediment trap was installed in the Endeholz Ditch. The Endeholz Ditch is a small tributary of the Lutter river which has a catchment size of about 2.38 km<sup>2</sup> (HEUER-JUNGEMANN i. lit). Originally it was a small creek which has been extended to form a drainage ditch. About 10 m above it's confluence with the Lutter river a wooden box was installed in the river bottom (Fig. 1).



Fig. 1: Sediment trap in the Endeholz Ditch to quantify the load of fine sediments. The wooden box (Size: 2 m long, 1 m wide, 0.5 m deep) is open on the top. The sandy material which is mostly transported by rolling over the substrate, along with organic material is deposited in and caught by the box. The sand ripples which are seen in Fig. 1 on the left are typical of an unnaturally high sandy load and are more characteristic of a beach than the bottom of a natural heather creek.

From the end of 1991 to mid 2002 the sediment trap was emptied every week by young men who were doing their civilian service<sup>1</sup> (Zivildienstleistende = ZDL) in the nature conservation specialist agency of Lower Saxony. The amount of deposited material was measured as exactly as possible (Fig. 2).



Fig. 2: Sediment trap in the Endeholz Ditch just before the confluence with the Lutter river (background) with the mound of sandy and organic material which was taken out of the trap from 1991 to 03. April 1998. The size of the mound shows the large amount of material carried by this small ditch.

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<sup>1</sup> The sample collection within the measurement program „quantifying load of sand and mud in heather creeks“ has been done by the ZDL of the nature conservation agency. The following ZDL bore the main responsibility: Carsten Brauns (1991), Gundolf Reichert (1991/92), Gerrit Grannas (1992/93), Dierk Rischbieter (1993/94), Moritz Haupt (1994/95), Niels Ubbelohde (1995/96), Tobias Polch (1996/97), Michael Koslowski (1997/98), Gunther May (1998/99), Bernhard Schwarz (1999/2000) Arnold Ziesche (2000/01) und Michael. Herbst (2001/02).

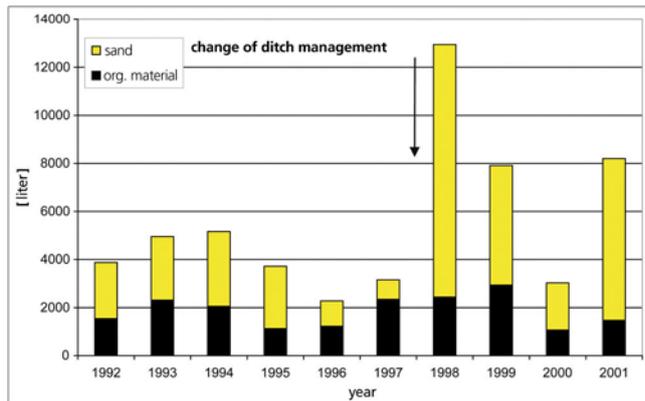


Fig 3: Annual sum of sediment load in the Endeholz Ditch. The change in the method of ditch management from hand clearance to machine clearance from the end of 1997 had a damaging effect on the ditch bottom and its banks, and the sediment load increased significantly. The amount of load after the maintenance of the ditch by machines was much higher than is shown in the figure as the sediment trap overflowed in the first weeks after that occasion.

In Fig 3 the result of weekly emptying the sediment trap is shown as annual sums. The change of load amount from about 3.2 m<sup>3</sup> in the year 1997 to about 12.9 m<sup>3</sup> in the year 1998. Up to 1997 management of the Endeholz Ditch was carried out by hand but from autumn 1997 it was done using an excavator. The effect of the excavator was to loosen the sand from the banks and bed of the ditch and to transport it downstream. The authors only heard of this change from the young men who were doing their civilian service, who suddenly every week had to remove more than one m<sup>3</sup> out of the sediment trap. The figures 4 to 6 show the effect of this change.



Fig. 4: The Endeholz Ditch in spring of 1998 after management by machines. On the right side the excavated material can be seen. The river bottom is exclusively sand. The ripples are characteristic of the moving sand.



Fig. 5: Mouth of the Endeholz Ditch to the Lutter river in April 1994. At this time very little sand was transported into the Lutter river.



Fig. 6: Mouth of the Endeholz Ditch to the Lutter river on 03.04.1998. The large mass of sand which has been transported into the Lutter river after management of the ditch by machines is clearly seen. The sand which is seen here wasn't caught in the sediment trap 10 m upstream, because the trap was full. Therefore, the amount of load shown in Figure 3 for 1998 is an underestimate.

### **3 Reduction of unnaturally high sand load through installation of sediment traps and monitoring by photo documentation**

The input of unnaturally high load of fine sediments in running waters can arise from several different sources depending on the type of land use. Therefore different measures are required to reduce the input. Erosion from farmland results in a considerable loss of valuable soil, therefore it makes sense for farmers to increase their efforts to minimize this loss. In spite of the efforts of the farmers, there will be soil conditions (for example directly after

ploughing) when heavy rainfall will bring high amounts of erosion. There needs to be methods utilised that will reliably prevent harmful input of fine sediments in all situations.

Once it was recognised that the unnaturally high sand load from drainage ditches which flow into the Lutter and its tributaries was the essential reason for the absence of FPM reproduction, sediment traps and plant beds were designed to stop the problem. Sediment traps are created by widening and deepening the drainage ditches. This causes the flow velocity in the area to be reduced so that the sand, silt and coarse organic material is deposited and can be excavated with ease. The function can be demonstrated by taking the sediment trap near the village of Bargfeld as an example. A photo series shows the origin of the sandy load and the successful disposal of these pollutants by the use of the sediment trap.

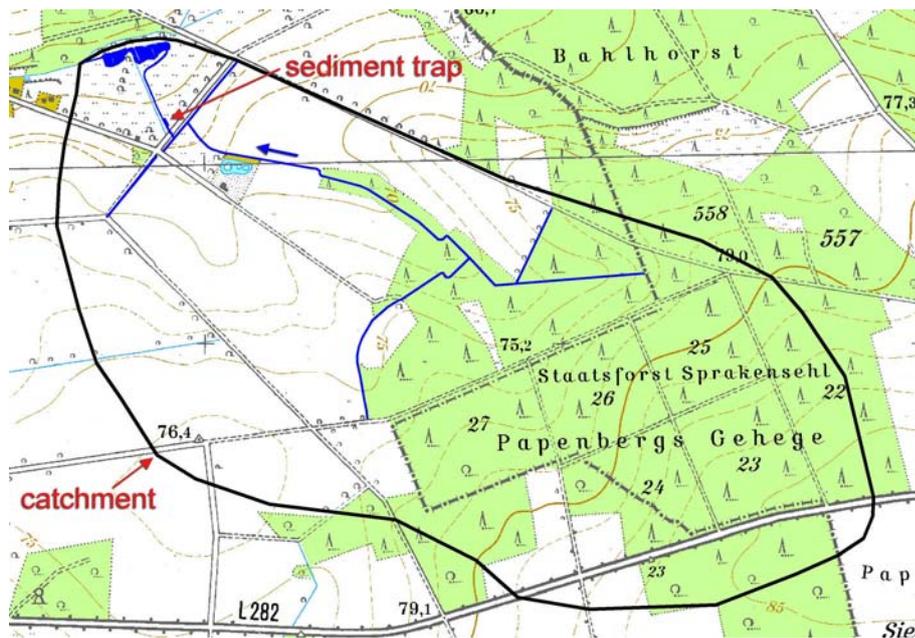


Fig.7: The sediment trap of Bargfeld (in the picture top on the left side) . The sediment trap is situated near a road and, therefore it is within easy and cost-effective reach by machines to empty it.

The sediment trap of Bargfeld (Fig. 7) (WIDRINKA in litt.) receives material from a catchment of about 2 km<sup>2</sup>, of which about 50 % is farmland. This area is almost completely drained and the drainage ditches are cleaned out by machines every year as part of the obligations of water maintenance. The sandy soils are very thin and lay on impervious glacial till. Because of this they can hold and store only small amounts of water. So the drainage ditches are constantly water-bearing only in wet years. In „normal“ years they dry out in summertime.

As with all other cases within the Lutterproject, this sediment trap is situated for ecological reasons directly downstream of the part of the drainage ditch that is under periodic maintenance. So the total sand load of the entire stretch upstream can be caught. The riverbed downstream is not under water maintenance - only the vegetation above water level is cut, in exceptional circumstances. Being permanently water-bearing, the stretch downstream of the sediment trap is free of unnatural sediment loads and can develop in a near-natural way.

For economic reasons the sediment trap is built near a road in order to reach it easily with machines for excavation. The system of water management is shown in Fig. 7 and 8. The water which comes from the farmland flows into ditches near the road, crosses the road (red arrow) and flows to the north north-west (nnw) into the little creek called “Köttelbeck” in the

region of “Langenfeld”. In this ditch a sediment trap was built near the road in the winter of 1998/99.

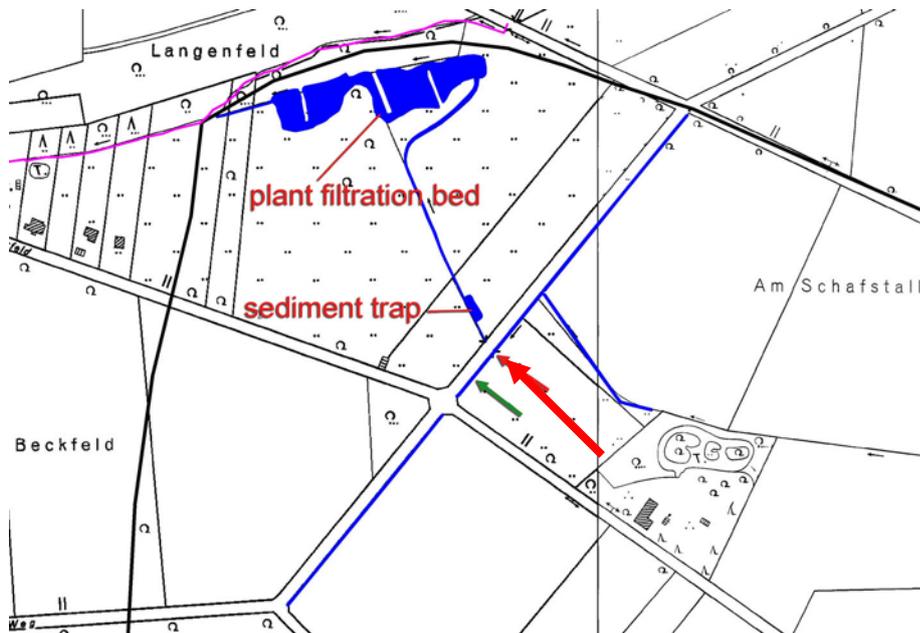


Fig. 8: The complete system, comprising the sediment trap and the plant-bed situated at the lower end of the catchment. The water from the drainage ditches first enters the the sediment trap and then flows through the plant filtration bed. This is a secondary system to absorb the fine particles, which are so small that they do not settle in the sediment trap.



Fig. 9: View in flow direction of the „Sediment trap Bargfeld“ in summer of 1999 about one year after completion and after the first time of excavation. In front of the left side the mouth of the drainage ditch can be seen. At the far end on the left of the sediment trap the drainage ditch continues its flow through dense vegetation.

In winter 2004/2005 the function of this sediment trap was documented photographically. It should be pointed out that there is a time difference between “cause of the unnaturally high load” (this means: ditch management) and “occurrence of the sand downstream” (this means: in the sediment trap).

The following photo series clearly show the effect of ditch management by machines, the successive transport of sand and the function of the sediment trap.

#### Photo series 1 (Fig. 10a-d)

The position of the photographer is about at the top of the red arrow in Fig. 8. For an illustration of the situation in autumn, a picture was taken in autumn of 2005. (Fig. 10a).



Fig. 10: Drainage ditch running parallel to the farm road. For position of the photographer see Fig. 8, top of the red arrow, view direction: sw.

Fig. 10a: Situation before the annual ditch maintenance (12.11.2005).

Fig. 10b: directly after maintenance by machines (21.11.2004).

Fig 10c: More than one month after maintenance at 30.12.2004 . Additional sand is transported in this stretch.

Fig. 10d: At 16. 03. 2005, most of the sand which was loosened during clearance is washed away. It remains a stony and gravelly river bed as is typical for natural creeks in this region.

**Photo series 2, Fig. 11a – 11 d:** Position of the photographer the same as in fig. 9, south of the sediment trap. View direction: north in flow direction of the drainage ditch.



Fig. 11: Sediment trap "Bargfeld".

Fig. 11a: the sediment trap on 30.12.2004. No sand has reached the sediment trap, more than five weeks after the ditch clearance and only 30 m downstream of position fig. 9 and 10. Only after two months (fig.: 11b, 22.01.2005), the amount of transported sand becomes more visible and then more evident two weeks later (fig. 11c, 06.02.2005). One month later (fig. 11d, at 16.03.2005) the sand transportation in the drainage ditch has been completed and the sand has reached the sediment trap. The plant has done its job. The sediment trap is approximately one third full, equivalent to about 50 m<sup>3</sup>. At this time the drainage ditch is already washed free of sandy material (see fig. 10d). Without the sediment trap the mass of sand would have been transported downstream to the Lutter River where it would have infiltrated and overlaid the naturally stony and gravelly river bed similar to the situation visible in fig. 10b and 10c. Also, without the sediment trap there would be no evidence of the quantity of sand that was mobilised by only one episode of ditch management by machine.

Both photo series demonstrate and explain one origin of unnaturally high sand load in a small drainage ditch in a low gradient area. It is a stark demonstration of the ecological problem present for the FPM. They also show that the chances to minimize this source of threat for the biocoenosis of running waters is relatively easy when located at the right place. Additionally they show that one needs a sediment trap to demonstrate the huge amounts of sand which can be contributed to a natural creek by one small drainage ditch. At the same point on the drainage ditch the situation can look stable for a long time (Fig. 10b and 10c). However, the sand passes over this area and, therefore one is unable to formulate an impression of the quantity of the sand that has passed through.

The sediment trap Bargfeld is an example of how unnatural sand input is prevented from entering natural running waters within the Lutterproject. Installation of sediment traps in each of the numerous drainage ditches within the catchment of the Lutter River was reliant on the fact that the areas were purchased by the project management. Then a procedure was developed to get permission to install the sediment traps. The realization of all the necessary projects took a very long time - from 1989 up to the present (2006). Therefore the input of sand could only be reduced in successive stages. The effect to the biocoenoses of all these measures therefore could only arise after the gradual improvement of the ecological conditions.

#### 4 Accelerated reduction of fine sediment load by the use of a mill pond as a sediment trap

The reduction of fine sediment load in the lower reaches of the Lutter River got an important boost through purchasing the rights to an old Mill in the village of Eldingen by the Lutterproject management. The remaining semi natural stretches of the river Lutter lie downstream of this mill. In the summer of 1989 the owner of the mill was informed about the problems the pearl mussels had with mobilized sediments coming from the mill pond. After this he kindly agreed not to drain off the mill pond. Previously, the mill weir had been raised during flood events to preserve the buildings. The effect or success of not raising the weir is shown in figure 12. After purchasing the watermill in 1992, the water level of the mill pond has been permanently lowered as far as it was possible, so that the water could pass the mill even in flood without damaging the buildings (See 12b). Since then the mill pond has never been emptied and it acts as a very large sediment trap. The accumulated sand and mud has been taken out by the use of a suction dredge. To date, about 6,800 m<sup>3</sup> of sand and mud have been pumped out (personal communication: government of the county of Celle and engineering office HEIDT & PETERS, Celle).

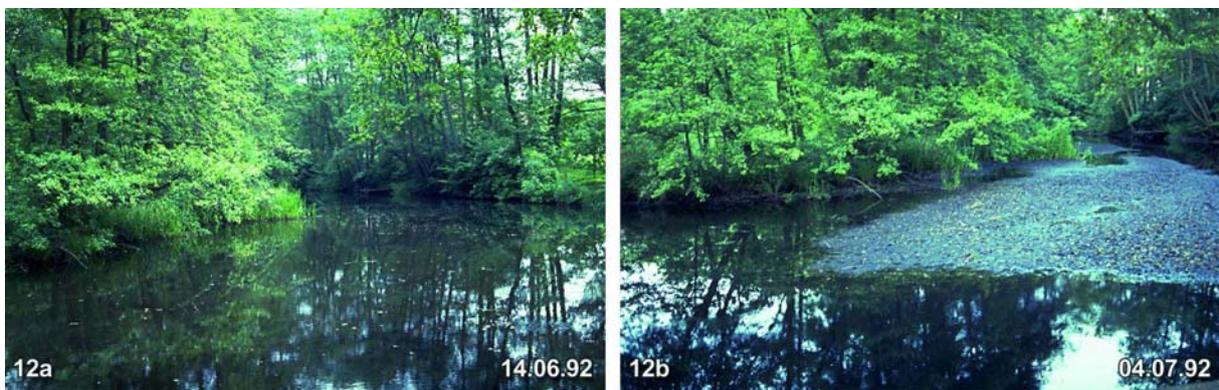


Fig. 12: Back water of the mill of Eldingen just before (left) and just after (right) the notary certification of the contract of sale. Prior to 1992, large quantities of sediments had already accumulated in the backwater of the mill (right picture).

As these pumped out masses of sediments are not washed downstream, they have not covered the natural river bottom and killed the typical biocoenosis. On the contrary, the sand masses which covered the stony and gravelly river bottom up to this time were successively washed away so that gravel and stones appeared again at the surface. Fig. 13 shows how much the quantity of sediment drift has been reduced by this action. In the year 1968 under leadership of BISCHOFF a small bypass was built in a narrow curve of the Lutter about seven kilometres downstream of the mill of Eldingen. About 5 - 10 % of the Lutter water runs through this bypass. In January of 1991 a sediment trap like the one shown in fig. 1 was built in this bypass. This sediment trap has been emptied weekly since then. Fig. 13 shows the annual sum of the sediment drift from 1991 to 2006. The sum of rainfall has been measured in the private „weather station“ of the first author, which is located about 5 km from the sediment trap. The high rainfall in winter 1993/94 gave rise to a corresponding high flow in

the Lutter, and produced very high sediment drift. In 1994 up to 19 m<sup>3</sup> sand was removed from the sediment trap. This equates to about 190 - 380 m<sup>3</sup> sand transport in the Lutter. As with the trap in the Endeholz ditch, this sediment trap also overflows in the weeks with the highest sand transport. As the fine sand fraction doesn't deposit, the real amount of transported material is even higher than has been measured.

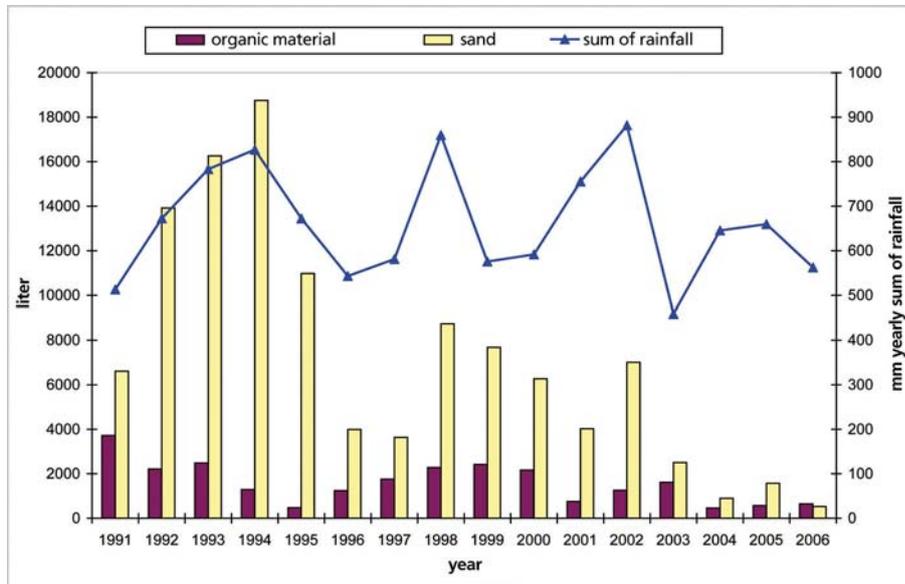


Fig. 13: Trend of sediment transportation in the Lutter. The amount has been measured in a sediment trap as shown in fig. 1. The success of the sediment trap "mill pond" and of the sediment traps in the drainage ditches is clearly seen.

Initially the upper reaches of the c. seven kilometre long stretch downstream of the mill were washed free from overlaying sand. The stony and gravelly substrate emerged again and could be colonized by the typical Flora and Fauna. The typical inhabitants of a natural brook reacted immediately to this naturally recovered structure of the river bottom. An example of this phenomenon was the new high reproduction of minnows (*Phoxinus phoxinus*).

## 5 Successes for the biocoenosis of the brook

### 5.1 Example minnows (*Phoxinus phoxinus*)

Minnows are typical and numerous inhabitants of waters with stony gravelly bottom and / or shores. In the lower reaches of the river Lutter downstream of the mill of Eldingen they had only seldom been caught by annual electro fishing, which had been carried out since 1985. This changed after the transport of fine sediments was stopped in summer 1992. The winter flood in 1993/94 then washed out the sand, which had previously covered the stony gravelly river bottom (ALTMÜLLER & DETTMER 1996). The minnows reacted immediately to this and reproduced very successfully. Given their former rareness the sudden appearance of breeding minnows was very surprising. It was also confirmation that the large amounts of sand were the greatest remaining problem for the river ecosystem.

Minnows spawn in gravel material and prefer a grain size of 2 cm in diameter (BLESS 1992), and they spawn in sections with high current. While spawning the Minnow -♀ inject their eggs between the gravel (Fig. 14). The eggs cling on to the gravel because of their adhesive surface. Here they are protected against voracious individuals of the same species and are supplied by a circulation of oxygen rich water. After about a one week's embryonic development the hatched out fish larvae migrate as deep as possible into the substrate, most likely to escape the suction from the turbulent water above them. They are supported by a yolk sac and are not able to swim (benthic phase). They hide in narrow niches between stones where the current is at its lowest (Fig. 15). Here they are most protected. However,

these are also the parts of the river bed that are first clogged if sediments are brought into the river - which is fatal for the inhabitants. After development within the substrate the minnow larvae migrate upwards through the interstitium into the open water (pelagic phase, free swimming larvae).

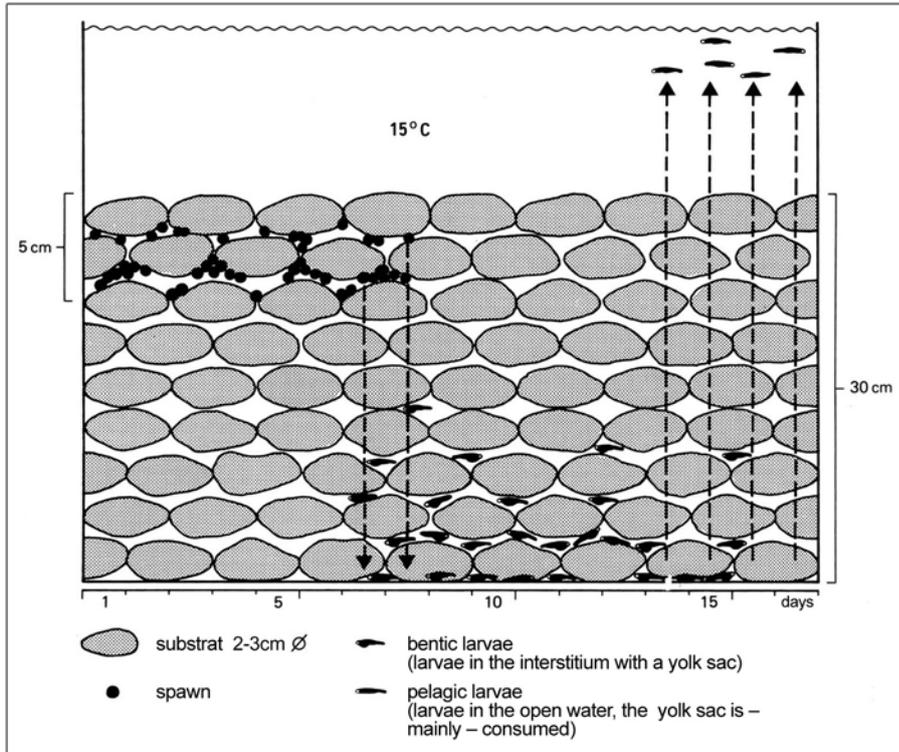


Fig. 14: Time table (Tage = days) of the space used by juvenile stages of minnows at 15 °C water temperature (after experiments in an aquarium). The aquarium is filled with a 30 cm thick gravel layer in a size which minnow-♀ prefer. For explanation see text (Figure adapted slightly from BLESS 1992).

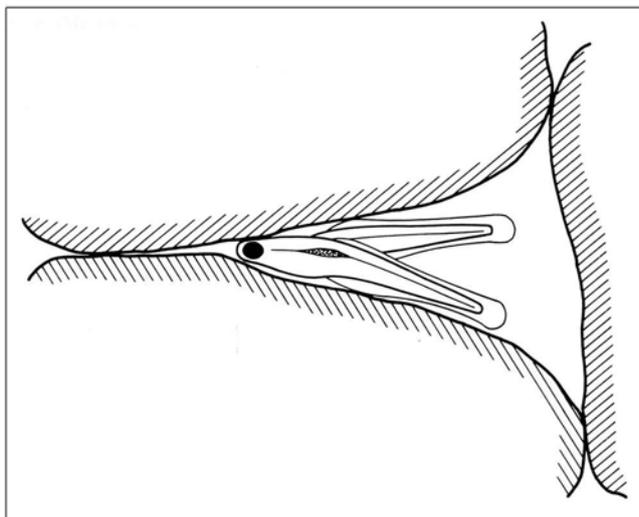


Fig. 15: Minnow larvae hide into narrow niches made by the gravel, probably to protect themselves against upward suction by the current. Here (as deep as possible in the bottom in the narrow niches formed by the gravel) the suction power is lowest and so is the danger of washout (after BLESS 1992).

The following graphs (Fig. 16a-e) show the minnow population in the lower reaches of the river Lutter downstream the mill of Eldingen. In the graphs the number of minnows per 100

metres is shown within each of the randomly selected fishing sectors. The sectors which have not been fished are marked. It can be clearly seen that the minnows - starting in the upper reaches - successively colonized (or re colonized) the river Lutter. Minnows are now (in 2006) again the typical and most numerous inhabitants of the river, and always accompany the author during the snorkelling surveys to investigate the pearl mussel population.

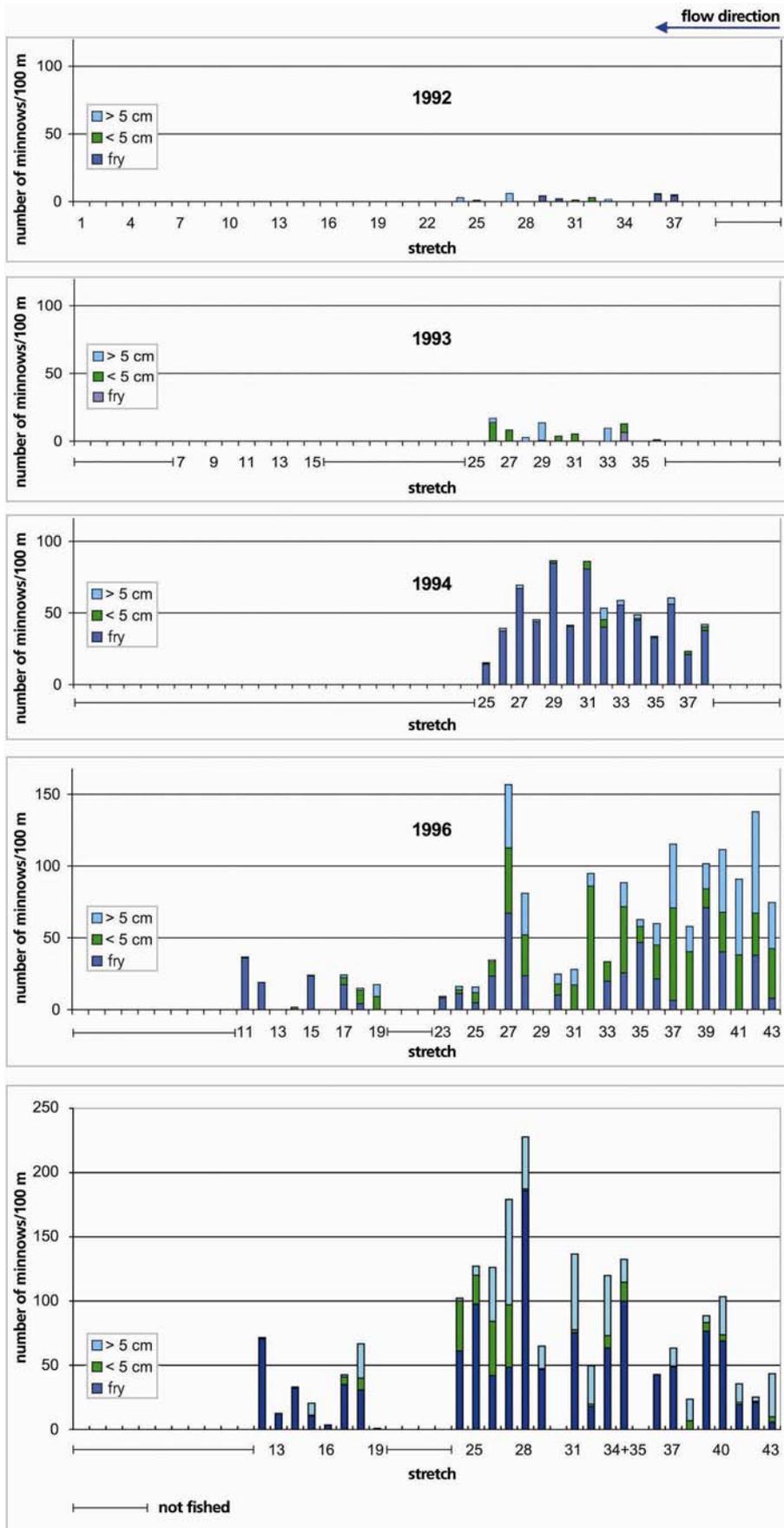


Fig. 16a-e: Development of the minnow population in the natural lower reaches of the river Lutter in the years 1992 - 1998. Sectors which were not investigated by electro fishing are shown by a line. Abschnitt = stretch; nicht befischte = not fished.

## 5.2 Example of the Freshwater Pearl Mussel

As the rate of growth of the FPM is very slow and the young mussels spend at least the first 5 years of their life hidden in the river bed substrate, the success of the measures for the species and biotope protection for the FPM (the target species), could only be shown after several years.

In the river Lutter the young FPM need to reach the age of about seven years before they are big enough to emerge from the gravel into the flowing water to get more water through their gills for better oxygen and food supply. It is only then that they can be seen by the investigator without destroying their habitat by dredging.



Fig. 17: River bottom of the Lutter with an adult FPM and three young mussels which are not easily seen between the gravel.

The first shells of young mussels were found in 1997, and the mussel population has been investigated by snorkelling annually since 2000.

The results of these investigations are shown in figure 18. In 2006 more than 83 % of the total of about 7,400 FPM in the river Lutter are younger than 20 years. This success is in great contrast to the fact that all other european freshwater pearl mussel populations in human settled regions are without successful reproduction and therefore they are threatened with extinction (GEIST 2005).

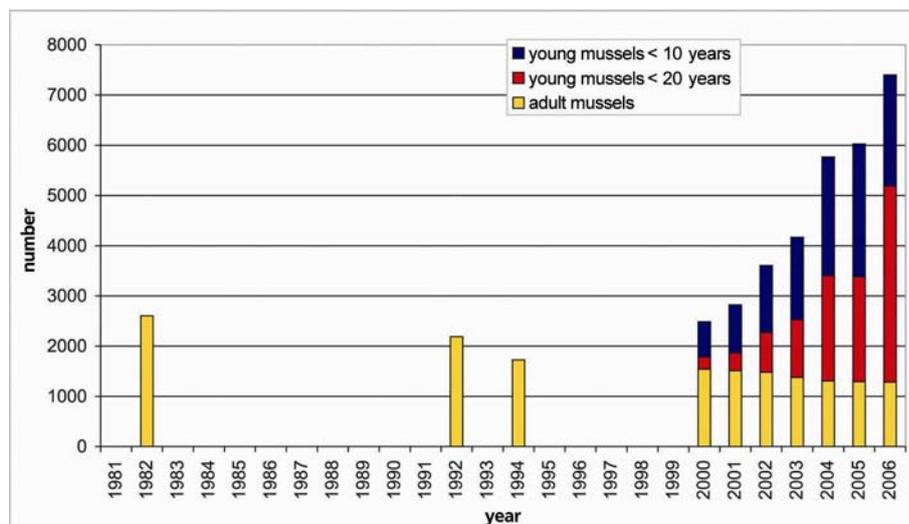


Fig. 18: Population development of the Freshwater Pearlmussels in the river Lutter. This positive trend is due to the reduction of the anthropogenic sand load since the upstream mill pond has not been drained off and therefore the sediments are no longer washed out of the mill pond.

The long term survival of the FPM population in the river Lutter was given additional hope with the verification of the presence of young brown trout (*Salmo trutta f. fario*) in 2005 and 2006, which were naturally infected with FPM glochidia. (Fig. 19). Since the year 2003 no brown trout have been artificially infected with larva (glochidia) of the FPM in the natural lower reaches of the river Lutter. Furthermore, given that the oldest of the young FPM came to mature age and in view of such a large number of young mussels, natural infection of brown trout should be possible. However, to be certain of this, the artificial infection of brown trout with FPM glochidia must be stopped. The young infected brown trout which were found in 2005 and 2006 live in reaches of the river Lutter where only a few old FPM can be found. These few individuals produce too few glochidia to successfully infect brown trout. The high number of glochidia necessary for an intensive infection can only come from the high number of young mussels which are maturing at present.

The age composition of the infected brown trout is very interesting. Most of the infected fish examined in May of 2006 were born the previous year. They had been infected at an age of only a few months old. During the periods of artificial infection, fish this young were not utilised as they are very sensitive and easily damaged.



Fig. 19: Young brown trout of 2005 with nearly ripe young freshwater pearl mussels in the gills (light points) (result of electro fishing for monitoring - 07.05.2006). The glochidia are derived from young mussels which have matured after successful species and biotope protection measures. They will build up the F2 generation, but any success cannot be proven for another 5 – 7 years.

## 6 Conclusion and outlook on the future

Unnaturally high sediment load, produced by human land use and other activities, considerably affects running waters and their biocoenosis. Most of the running waters of the northern german lowland are in this damaged condition.

Taking the example of the river Lutter and its ecologically very demanding resident population of freshwater pearl mussel, it has been shown that there are indeed opportunities for restoration and, within this, chances of survival even for very demanding species which once were typical and abundant. This is dependent upon water quality not being reduced by waste water or unnaturally high input of nutrients, that there is still the original or a near-natural river bottom, and no unnatural sediment input.

The nature conservation measures for the freshwater pearl mussel in the catchment of the river Lutter were only made possible by the considerable funds made available for the Lutter Project, and by the goodwill, trust and cooperation of everyone involved in the project (ALTMÜLLER 2005).

The experiences and knowledge from the Lutter Project should be used not only for freshwater pearl mussel conservation measures in other catchments, they should be used in general for river conservation, development and restoration measures.

Anthropogenically derived high sediment load clogs the lattice system (Interstitium) between sand, gravel and stones so that the typical animals living there die. Furthermore, sediment covers continuously, in a rolling movement – like shifting sand dunes – even in a river bottom that was originally stable.

Each river bottom that is mainly stable is colonized by organisms almost on the surface. Where there is light and nutrient, algae may grow, but even small animals colonise a stable bottom in huge numbers or they live burrowed by themselves in the upper film. Even these less demanding surface organisms are suffocated by shifting sediment dunes, as well as those that live in the deeper interstitium.

As with the reduction of nutrient load, the reduction of fine sediment load must become a general requirement within running water restoration and protection work and a common goal of water and nature conservation.

In every case the place for reducing the unnaturally high load should be located as close as possible to the source of the problem. Erosion is harmful to a farmer's business and, therefore, it is in every farmer's interest to take all known and possible steps to reduce erosion and preserve economic viability. The most important measure is to have as complete a soil cover as possible. However in the course of a year there may be a phase without soil cover for arable farmland. For this period of time it is necessary to take precautionary measures on all sites which are at risk from erosion. For some farmers this precaution may seem to be excessive, because incidents of erosion are relatively few in number and with long periods between, and may even discourage some farmers from taking precautionary measures because of economic impact. However, even a single high erosion incident can bring major sediment input which can severely damage running waters and their very long lived biocoenosis.

Within the sphere of the Lutter project with maintenance of waters, especially management of drainage ditches, and the resultant sediment load, from an economic point of view it is indispensable to install sediment catchers in all drain ditches. In time it is possible to take out of the waters both the sediments which are mobilized by ditch management and those which are coming from erosion and/or other origins.

The excavation of the sediment traps can be done within the yearly maintenance of waters without any significant increase in cost, provided that the sediment trap is located where it will have maximum effect and its dimensions are big enough. However, the emptying of the sediment traps has to be done with care or else they will refill very quickly and then overflow. Special responsibility for the correct management of the sediment traps has to be taken by the association that also maintains the waters and manages the ditches.

The measures of nature and water protection that are described in this article especially apply to the preservation and recovery of the freshwater pearl mussel. But all measures together already contribute towards fulfilling targets set within several Directives of the European Parliament. So the restoration work on the lower reaches of the river Lutter are very successful species and habitat conservation projects within the European Habitats Directive but also within the European Water Framework Directive to achieve good ecological conditions:

- Within the European Habitats Directive the habitat 3260 „Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation “ have been brought into favourable conservation status (Annex I, Directive 92/43/EWG)
- the populations of the freshwater pearl mussel, the Green Club-tailed Dragonfly (*Ophiogomphus cecilia*) and the Bullhead (*Cottus gobio*) has been brought into favourable conservation status (Annex II, Directive 92/43/EWG).

Within the European Water Framework Directive (Directive 2000/60/EC) the recovered stretch of the river Lutter, or rather the condition of it, was brought into a good status, i.e. the hydromorphological characteristics and the physico-chemical quality elements.

In addition to the above, the special feature of this water protection, water conservation and nature conservation project is that there are only small follow-up costs and also no costs to manage a specific state of cultural landscape.

## **7 Table of the colleagues involved in the species protection measures for the freshwater pearl mussel**

The results of electrofishing and the success of the species protection measures that are described here has been achieved by enthusiastic friends of nature, generally in their free time. The spawning time of the FWP-♀ is not predictable. Therefore in summer from mid-July all private appointments had to be subordinate to the life history of the mussels. In the following all attendees of the species protection measures for the freshwater pearl mussel in Lower Saxony (also in the rivers Lachte and Bornbach) are listed in alphabetic order.

Reinhard Altmüller, Wolf-Dietrich Bischoff, Dietrich Blanke, Ulli Brandt, Rainer Dettmer, Frauke und Heiner Drögemüller, Christian Gietz, Otto Golze, Günter Grein, Roger Günzel, Stefan Heitz, Iris Herrmann, Thomas Herrmann, Matthias Holsten, Renate und Stefan Hölter, Lennart, Manuel und Norbert Horny, Gerd Hübner, Thomas Kaiser, Heinrich Klaholt, Andreas Knoop, Ernst und Ole Kohls, Henning Köneke, Gabi Kremming, Jens Kubitzki, Peter Lorz, Hans-Jürgen Löther, Sonja Lüßmann, Christian Makala, Anna, Hans und Moritz Menneking, Lars und Wolfgang Mosel, Annette Most, Dirk Mundt, Matthias Olthoff, Sören Ostermann, Ulrich Pittius, Gabriele Potabgy, Anke Preiß, Manfred Rasper, Günter, Ronja und Vigdis Ratzbor, Dierk Rischbieter, Thomas Schick, Gudrun Schmal, Daniel Schneider, Burkhard und Ulrich Schnepfer, Peter Sellheim, Brigitte Steinhardt, Egon Steinkraus, Agnes Steinmann, Andreas Thiess, Frank, Hans-Hermann und Holger Trumann, Wieland Utermark, Günther Wilkens.

In addition to the young men listed on page 3 who made their civilian service (ZDL) were the following ZDL involved in the species protection measures and the surveys:

Thomas Clavier, Carsten Dettmann, Michael Friese, Thorben Fründt, Michael Geilke, Manfred Grenz, Günther Hansen, Horst Hildebrandt, Markus Kietz, Thomas Klug, Andreas Nitschke, Ulrich Söffker und Alexander Wiebe.

## 8 Summary

The freshwater pearl mussel was formerly abundant in running waters of the „Lüneburg Heath“, a north eastern landscape in Lower Saxony in the North of Germany. Using the example of the remaining freshwater pearl mussel population in the river Lutter it has been shown that good water quality alone is not enough for its survival. The unnaturally high amounts of load (sand and silt) are harmful substances for the river biocoenosis. Only after the reduction of these high amounts of load could typical fish such as minnows (*Phoxinus phoxinus*) naturally reproduce. Also, it is only after the reduction of the huge load that the relief measures which focused on artificially infecting wild living brown trout (*Salmo trutta f. fario*) with glochidia became successful with young mussels surviving and growing. Currently the next mussel generation has started to grow up without any artificial help.

With the installation of sediment traps in all drainage ditches a method has been developed and used, which can help to reduce the problems with unnaturally high load of fine sediment and which may be applied across Europe.

Some targets of the European Habitats Directive and of the European Water Framework Directive are shown to be achievable.

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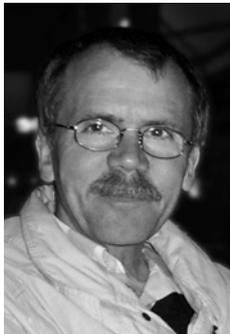
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### The authors



Dr. Reinhard Altmüller, born 1948, studied biology and read for his doctorate at the Georg-August-Universität at Göttingen. Since 1976 he has been responsible for Invertebrates at the Lower Saxony Specialist Agency for Nature Conservancy. One focus of his job has been to investigate the organisms of running waters, especially the freshwater pearl mussel, and the development of ways to improve their habitats.



Rainer Dettmer, born 1955, studied biology at Hanover. In his dissertation he investigated the biology of the freshwater pearl mussel (1982). Since then he has worked on the biology and conservation of naiads and other limnological questions, especially electro fishing, funded by different institutions (TiHo Hannover, Lower Saxony State Agency for Ecology, NLWKN, Nature Conservation Organisations, Nature Conservation Council).

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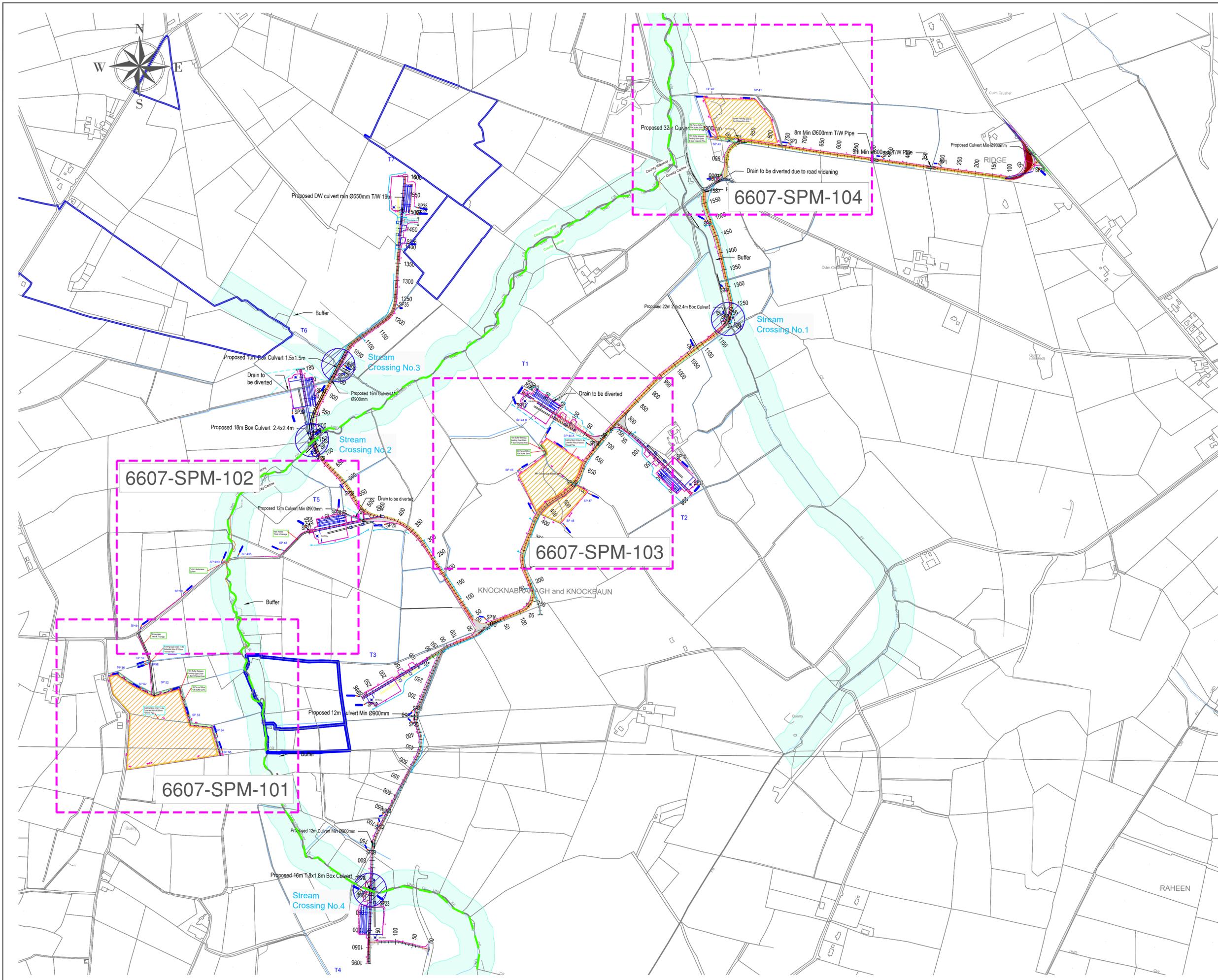
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**Annex 2 –  
Planning-stage Drainage/Surface Water Management System**





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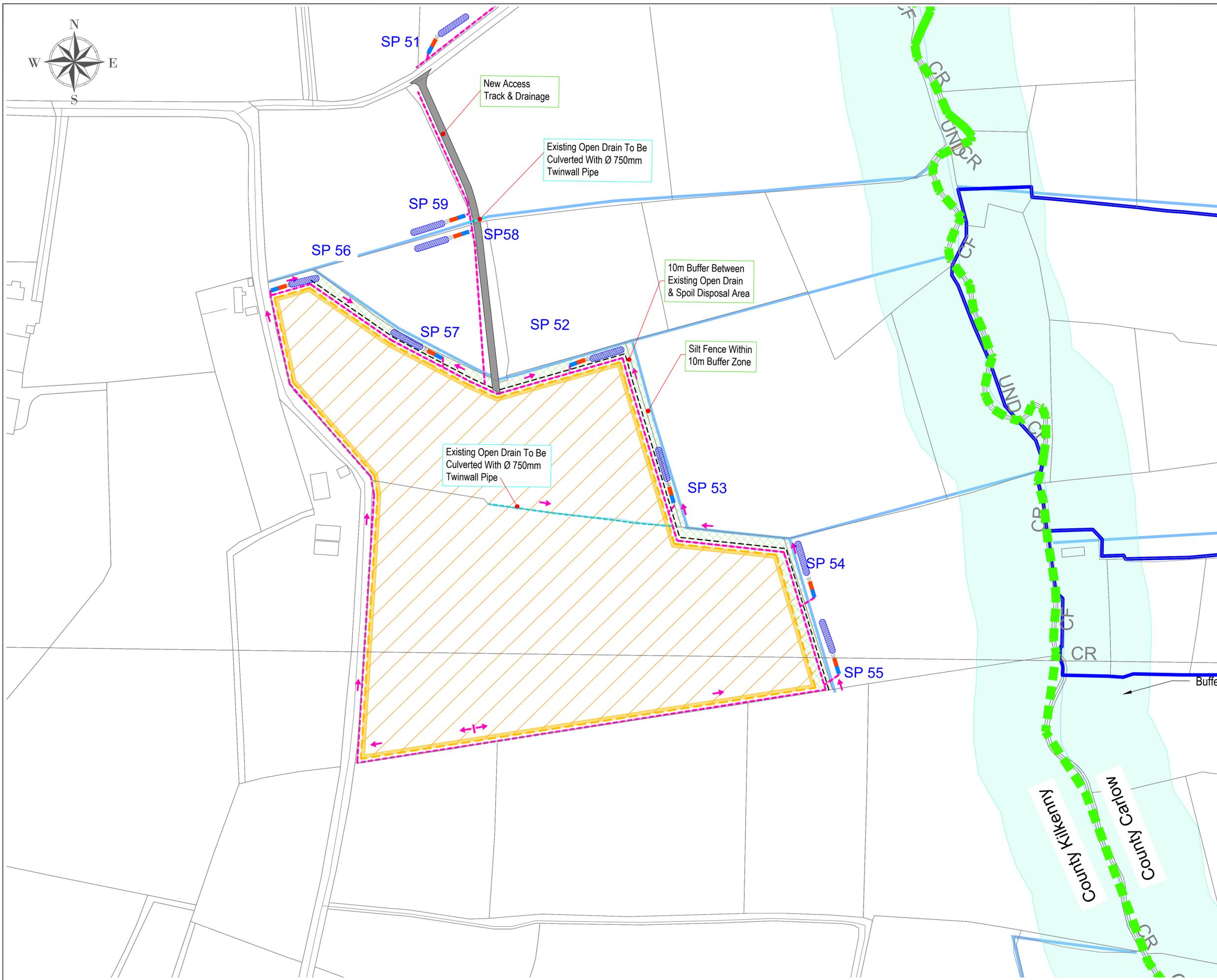
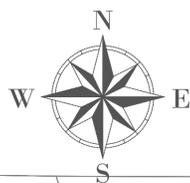
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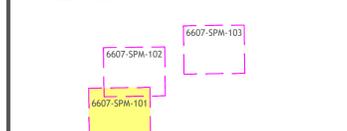


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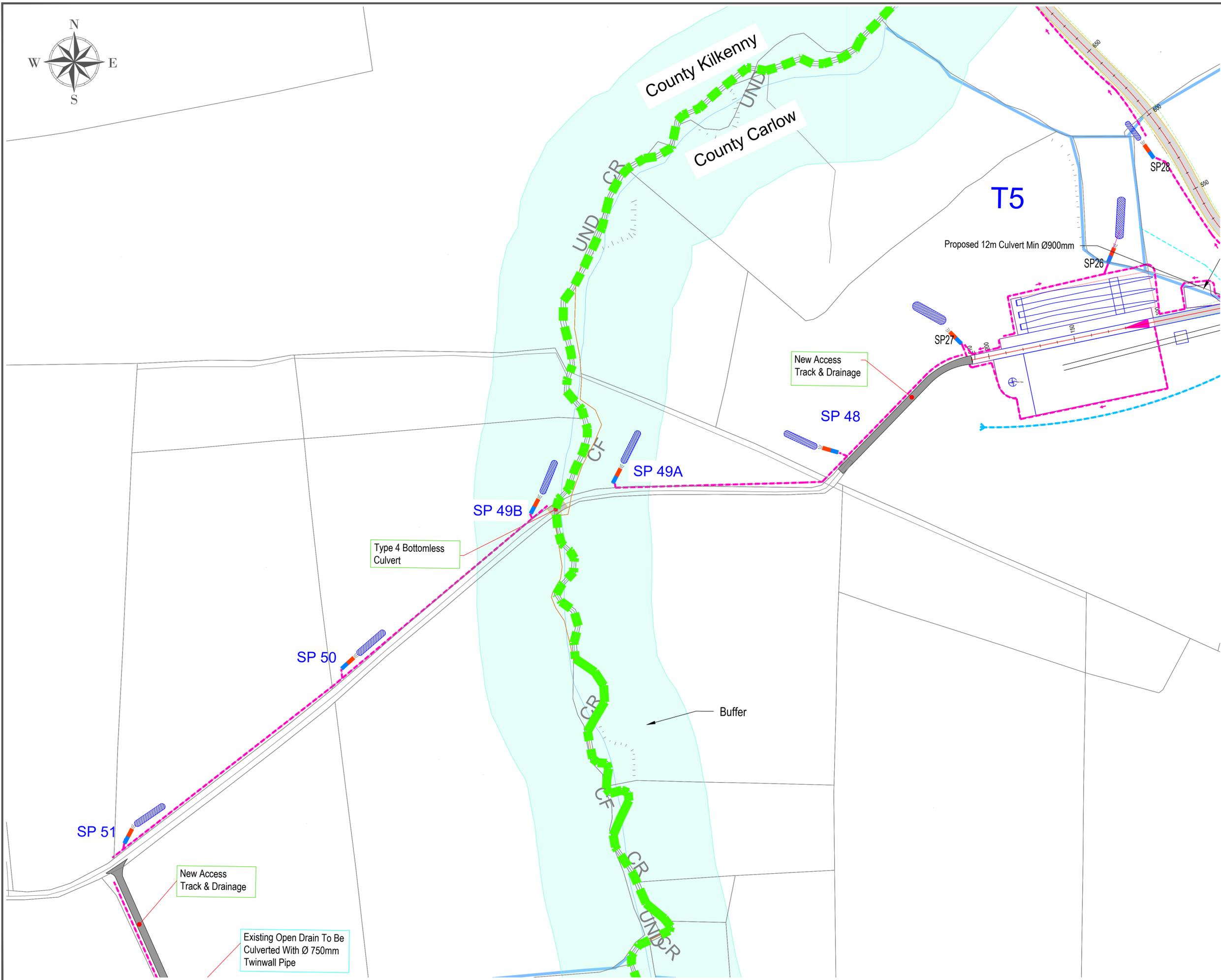
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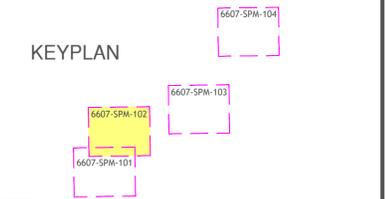
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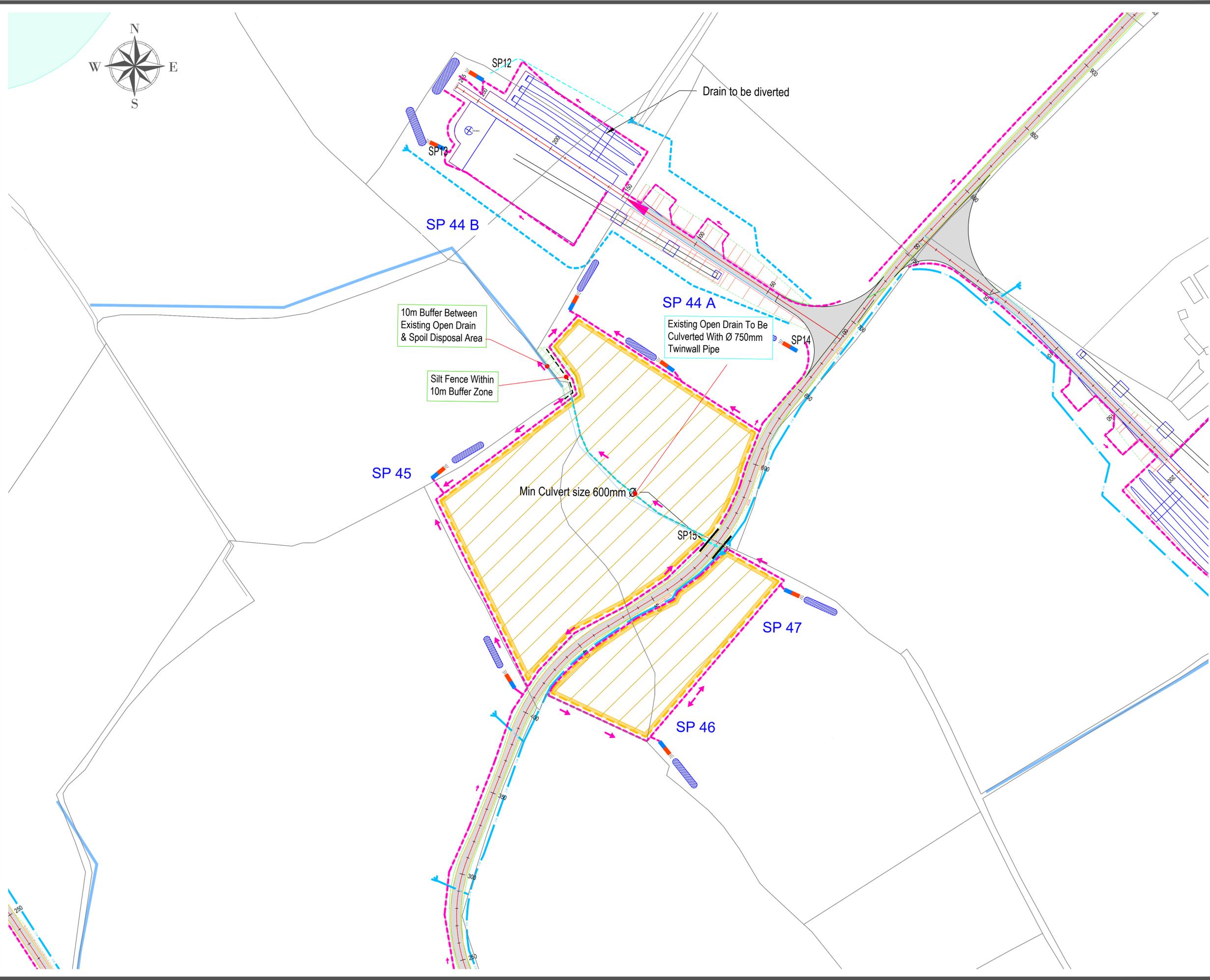
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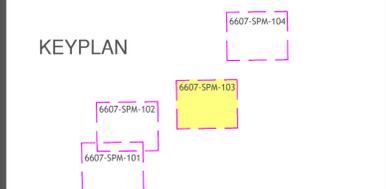
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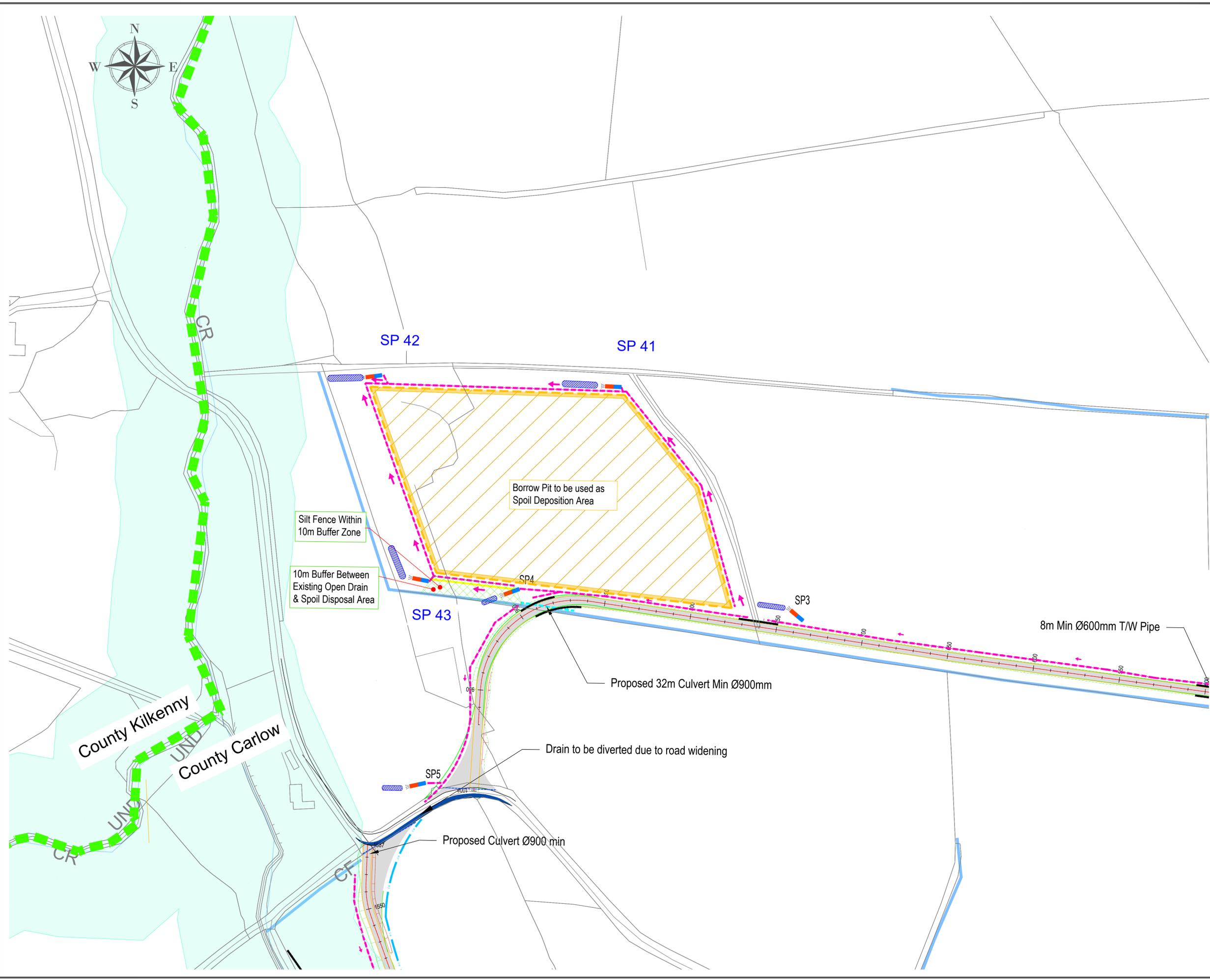
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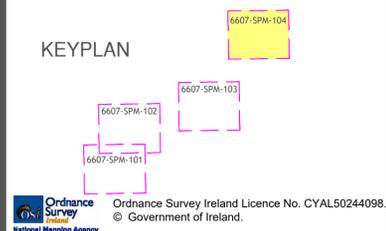
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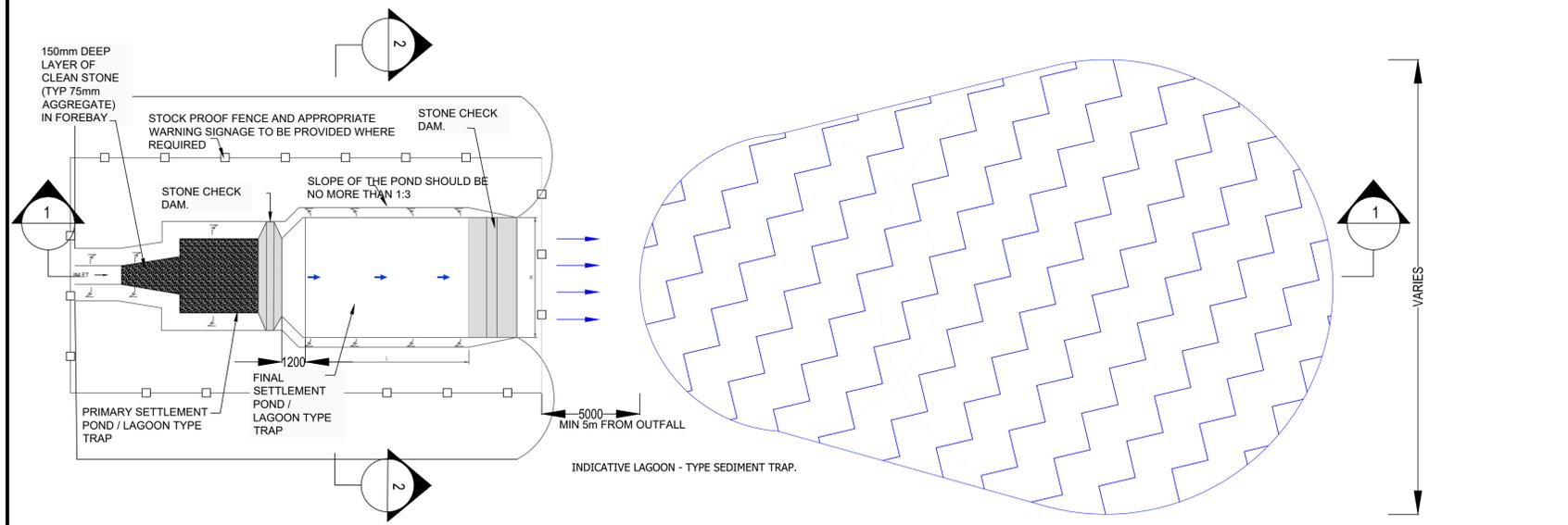
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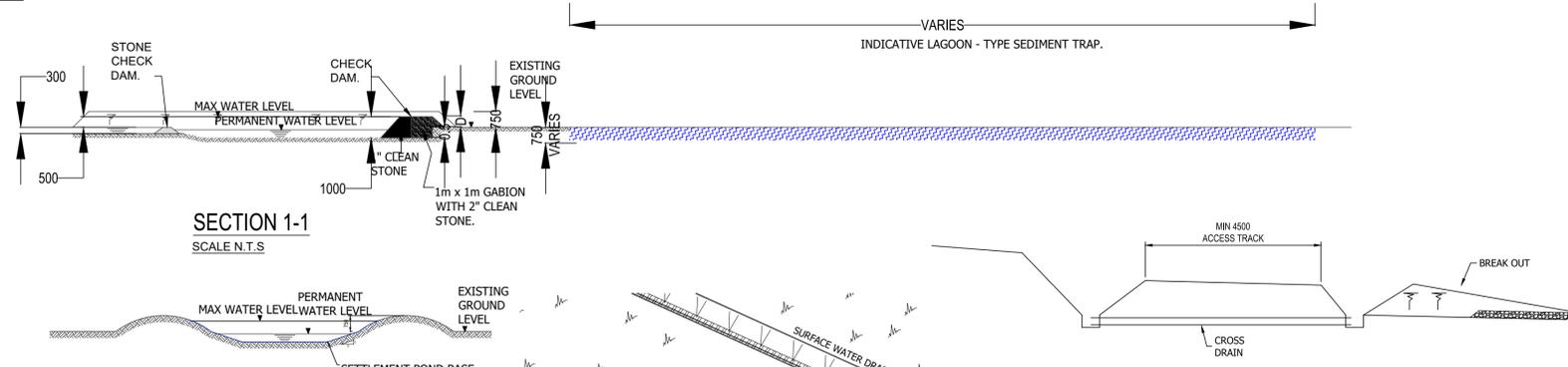
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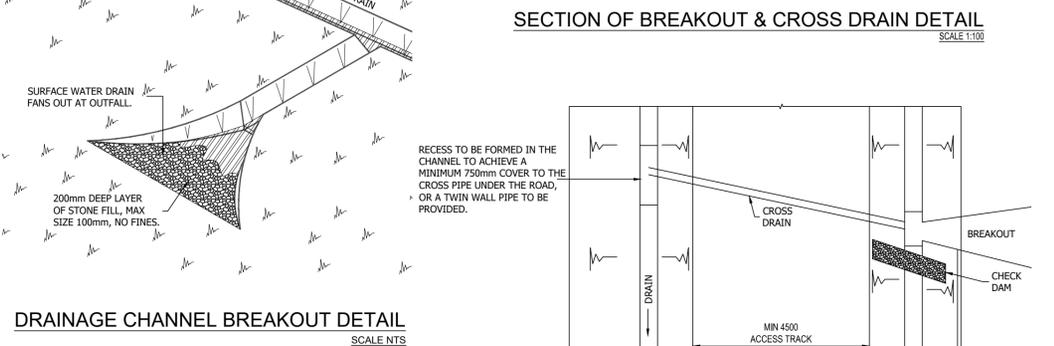


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SCALE N.T.S.

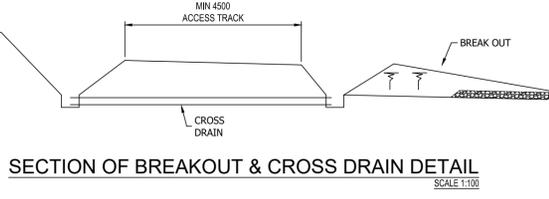


SECTION 1-1  
SCALE N.T.S.

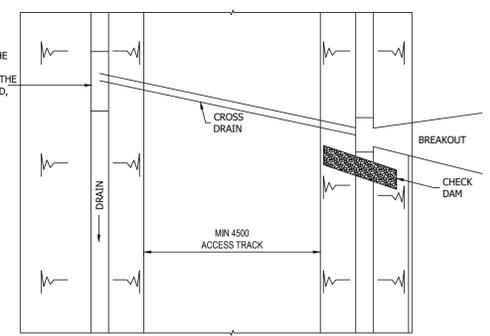
SECTION 2-2  
SCALE N.T.S.



DRAINAGE CHANNEL BREAKOUT DETAIL  
SCALE N.T.S.

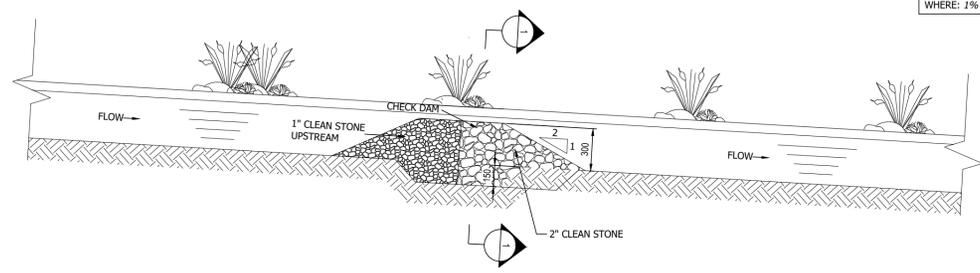


SECTION OF BREAKOUT & CROSS DRAIN  
SCALE 1:100

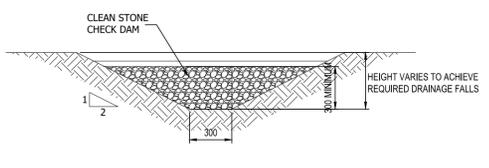


PLAN OF BREAKOUT & CROSS DRAIN DETAIL  
SCALE 1:100

NOTE:  
AS A RULE OF THUMB FOR CHECK DAM SPACING, THE MAXIMUM SPACING BETWEEN CHECK DAMS SHOULD BE SUCH THAT THE TOE OF THE DOWNSTREAM DAM IS AT THE SAME ELEVATION AS THE TOP OF THE CHECK DAM HEIGHT. SPACING IS CALCULATED FROM THE GRADIENT AND CHECK DAM HEIGHT.  
SEE WORKED EXAMPLES:  
=> 0.3M HEIGHT X (1 IN 100) = 30M SPACING;  
=> 0.3M HEIGHT X (1 IN 50) = 15M SPACING;  
=> 0.3M HEIGHT X (1 IN 50) = 25M SPACING.  
WHERE: 1% GRADIENT = (1 IN 100) AND 2% GRADIENT = (1 IN 50) ETC...

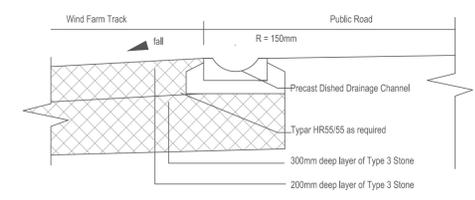


TYPICAL LONGITUDINAL SECTION THROUGH ROADSIDE SWALE WITH CHECK DAMS  
SCALE 1:25



SECTION 1-1  
SCALE 1:25

Pond Ref. SP	Development Area (m <sup>2</sup> )	Dim. length (m)	Dim. Width (m)	Dim. Depth (m)	Overall Volume of Attenuation Pond (m <sup>3</sup> )	Settling Velocity m/s < 0.0016	Settling Duration Hours > 4hrs
1	736	8.1	2.8	0.75	17.0	0.0003	7.09
2	791	9	2.8	0.75	18.9	0.0003	7.33
3	1314	14.5	2.8	0.75	30.5	0.0006	7.11
4	688	7.6	2.8	0.75	16.0	0.0003	7.12
5	949	10.5	2.8	0.75	22.1	0.0004	7.13
6	1846	15.8	3.6	0.75	42.7	0.0006	7.09
7	579	6.5	2.8	0.75	13.7	0.0002	7.24
8	628	7	2.8	0.75	14.7	0.0003	7.18
9	2060	17.7	3.6	0.75	47.8	0.0007	7.12
10	3024	20.7	4.5	0.75	69.9	0.0008	7.09
11	4507	20	5.2	1	104.0	0.0008	7.08
12	4526	20.1	5.2	1	104.5	0.0008	7.09
13	3024	20.7	4.5	0.75	69.9	0.0008	7.09
14	760	8.5	2.8	0.75	17.9	0.0003	7.21
15	2108	18	3.6	0.75	48.6	0.0007	7.08
16	1005	11.1	2.8	0.75	23.3	0.0004	7.12
17	3321	22.7	4.5	0.75	76.6	0.0009	7.08
18	2868	19.7	4.5	0.75	66.5	0.0008	7.12
19	1095	12.1	2.8	0.75	25.4	0.0005	7.12
20	700	7.8	2.8	0.75	16.4	0.0003	7.18
21	986	8.6	2.8	0.75	18.1	0.0004	5.62
22	484	8	2.8	0.5	11.2	0.0003	7.10
23	4042	18	5.2	1	93.6	0.0007	7.11
24	3665	16.3	5.2	1	84.8	0.0006	7.10
25	3139	21.5	4.5	0.75	72.6	0.0008	7.10
26	3082	21.5	4.5	0.75	72.6	0.0008	7.23
27	3780	16.8	5.2	1	87.4	0.0007	7.09
28	968	11	2.8	0.75	23.1	0.0004	7.32
29	1087	12.1	2.8	0.75	25.4	0.0005	7.18
30	1947	16.6	3.6	0.75	44.8	0.0007	7.07
31	2434	16.6	4.5	0.75	56.0	0.0007	7.06
32	3576	16	5.2	1	83.2	0.0006	7.14
33	180	3	2.8	0.5	4.2	0.0001	7.16
34	1475	12.8	3.6	0.75	34.6	0.0005	7.19
35	608	7	2.8	0.75	14.7	0.0003	7.42
36	1579	13.5	3.6	0.75	36.5	0.0005	7.09
37	3083	21.5	4.5	0.75	72.6	0.0008	7.22
38	2260	19.5	3.6	0.75	52.7	0.0008	7.15
39	862	9.5	2.8	0.75	20.0	0.0004	7.10
40	2535	17.4	4.5	0.75	58.7	0.0007	7.11
41	6650	22	6	1.2	158.4	0.0008	7.31
42	8300	23	6	1.4	193.2	0.0009	7.14
43	3150	16.5	4.5	1	74.3	0.0006	7.23
44A	7260	22	6	1.4	184.8	0.0008	7.81
44B	4840	22	5.2	1	114.4	0.0008	7.25
45	7300	24	6	1.2	172.8	0.0009	7.27
46	1800	16	3.6	0.75	43.2	0.0006	7.37
47	2950	20	4.5	0.75	67.5	0.0008	7.02
48	650	12	3.6	0.75	32.4	0.0002	15.30
49A	400	5	2.8	0.75	10.5	0.0002	8.06
49B	350	5	2.8	0.75	10.5	0.0002	9.21
50	700	8	2.8	0.75	16.8	0.0003	7.37
51	450	5	2.8	0.75	10.5	0.0002	7.16
52	4200	19	5.2	1	98.8	0.0007	7.22
53	10200	20	8	1.5	240.0	0.0008	7.22
54	3800	17	5.2	1	88.4	0.0007	7.14
55	8600	22.5	6	1.5	202.5	0.0009	7.23
56	14300	25	9	1.5	337.5	0.0010	7.24
57	4000	18	5.2	1	93.6	0.0007	7.18
58	450	5	2.8	0.75	10.5	0.0002	7.16
59	300	5	2.8	0.75	10.5	0.0001	10.74



DISHED DRAINAGE CHANNEL DETAIL  
SCALE 1:10

THIS DRAWING IS FOR PLANNING PURPOSES ONLY.  
IT IS NOT TO BE USED AS A CONSTRUCTION DRAWING.

NOTES:  
1 FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING.  
2 ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE.  
3 ENGINEER TO BE INFORMED OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES.  
4 THIS DRAWING TO BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT DRAWINGS AND SPECIFICATIONS.

02	Table extended to include Spoil Deposition	A.M.	J.M.F.E.	24.8.22
01.	Draft	C.Q.		
rev.	modifications	by	chkd	date

Client  
**WHITE HILL WIND LIMITED**

Project  
**WHITE HILL WIND FARM**

Stage  
**PLANNING - COMPLIANCE**

Title  
**TYPICAL DRAINAGE DETAILS**

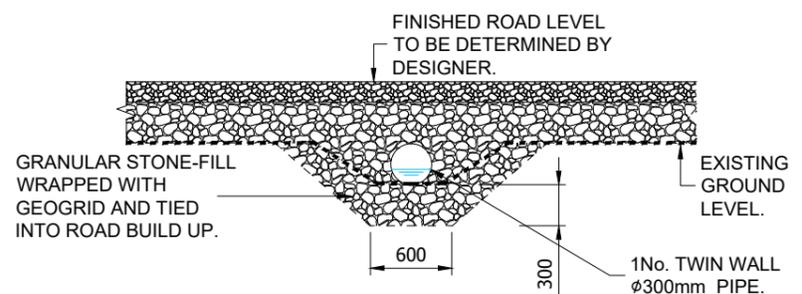
Scales  
AS SHOWN @ A1

Surveyed	Prepared By	Checked	Date
	C.Q.		FEB 2022

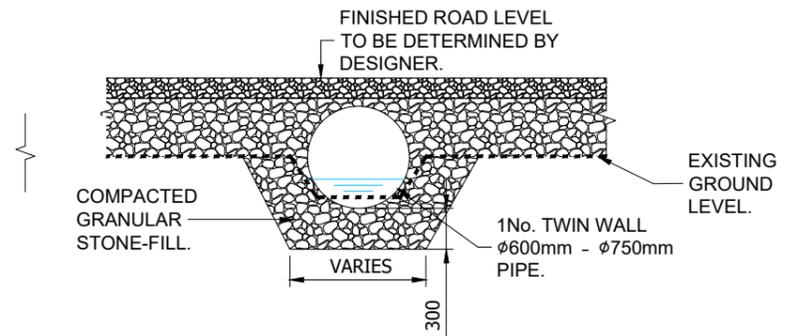
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Web. www.jodireland.com



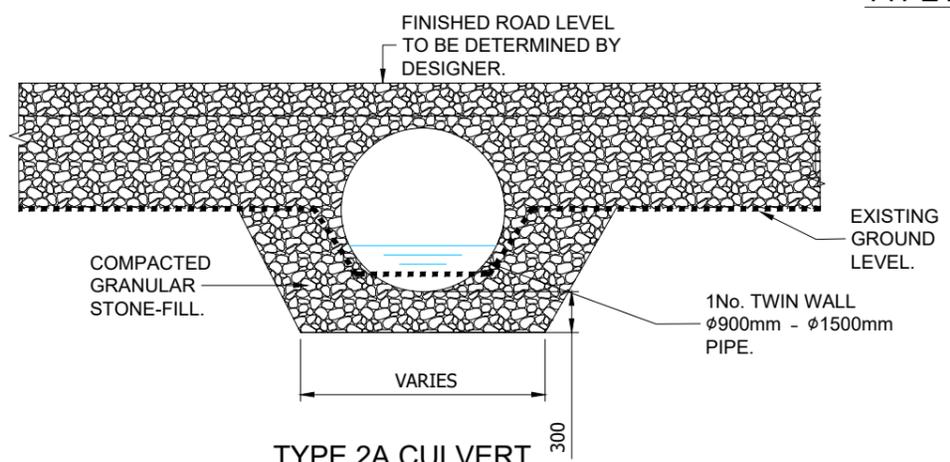
Job No.	Drawing no.	Revision
<b>6607</b>	<b>FIGURE 4.1</b>	<b>2</b>



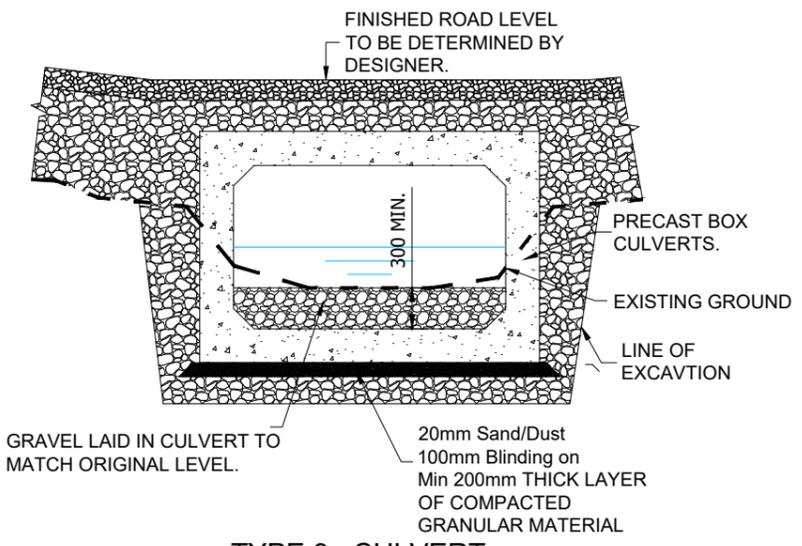
**TYPE 1 CULVERT**  
SCALE 1:50



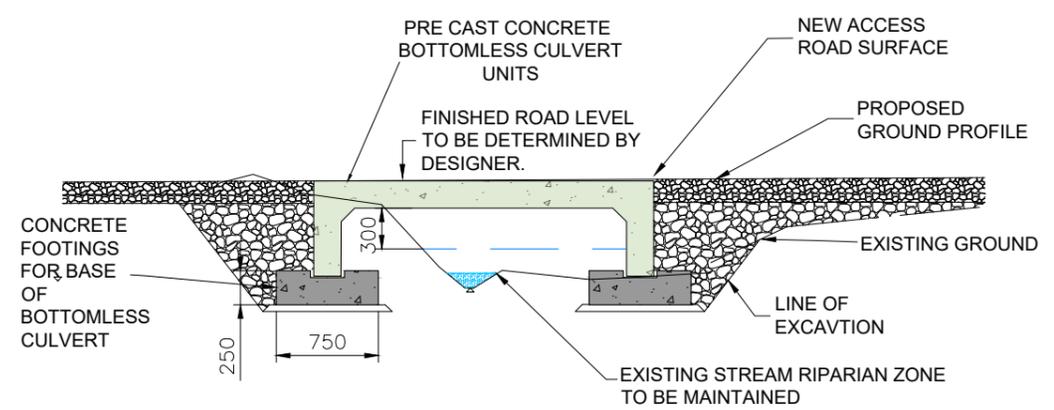
**TYPE 2 CULVERT**  
SCALE 1:50



**TYPE 2A CULVERT**  
SCALE 1:50



**TYPE 3 CULVERT**  
SCALE 1:50



**TYPE 4 BOTTEMLESS CULVERT**  
SCALE 1:25

**NOTE:**

CULVERTS ARE TO BE OF ADEQUATE SIZE TO CARRY PEAK FLOWS CORRESPONDING TO A 1 IN 100 YEAR STORM EVENT, WITH A MINIMUM DIAMETER OF 900mm. THEY SHOULD BE INSTALLED TO CONFORM WHEREVER POSSIBLE TO THE NATURAL SLOPE AND ALIGNMENT OF THE STREAM OR DRAINAGE LINE. CULVERTS GREATER THAN 1m DIAMETER SHOULD BE BURIED TO A MINIMUM DEPTH OF 300mm BELOW THE STREAMBED AND THE ORIGINAL BED MATERIAL PLACED IN THE BOTTOM OF THE CULVERT.

- FORMATION LEVEL TO BE DETERMINED BY THE CIVIL WORKS DESIGNER. REFER TO SITE INVESTIGATIONS REPORT.
- SUB BASE MATERIAL TO CONFORM TO THE FOLLOWING:
  - IMPORTED MATERIAL TO CONFORM TO TYPE 6F1 IN ACCORDANCE WITH TABLE 6/2 OF THE NRA SPECIFICATION FOR ROAD WORKS.
  - SITE WON MATERIAL ROCK WON IN EXCAVATION OF TURBINES MUST BE CRUSHED AND GRADED ON SITE. THE MAXIMUM SIZE OF AGGREGATE TO BE 125mm. THE AGGREGATE GRADING TO BE AGREED WITH THE ENGINEER.
- SURFACE LAYER TO BE CLAUSE 804. THIS LAYER MAY BE APPLIED IMMEDIATELY BEFORE TURBINE DELIVERY.

**NOTES:**

- FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING.
- ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE.
- ENGINEER TO BE INFORMED OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES.
- THIS DRAWING TO BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT DRAWINGS AND SPECIFICATIONS.
- ALL LEVELS REFER TO ORDNANCE DATUM (MALIN HEAD)

rev.	modifications	by	chkd	date

Client	White Hill Wind Limited		
Project	White Hill Wind Farm		
Stage	PLANNING		
Title	CULVERT DETAILS		
Scales	As Noted @ A3		
Surveyed	Prepared By	Checked	Date
	C.Q.	J.M.C.E.	FEB 2022

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Job No.	Drawing no.	Revision
6607	S300-SUDS-105	

**Annex 3 –  
Rainfall Data**



Met Eireann  
Return Period Rainfall Depths for sliding Durations  
Irish Grid: Easting: 261212, Northing: 166114,

DURATION	Interval		Years													
	6months,	1year,	2,	3,	4,	5,	10,	20,	30,	50,	75,	100,	150,	200,	250,	500,
5 mins	2.6,	3.7,	4.3,	5.2,	5.8,	6.3,	8.0,	9.8,	11.1,	12.8,	14.4,	15.6,	17.5,	19.0,	20.2,	N/A ,
10 mins	3.6,	5.1,	6.0,	7.3,	8.1,	8.8,	11.1,	13.7,	15.4,	17.8,	20.0,	21.7,	24.4,	26.4,	28.2,	N/A ,
15 mins	4.2,	6.0,	7.0,	8.6,	9.6,	10.4,	13.0,	16.1,	18.1,	21.0,	23.6,	25.6,	28.7,	31.1,	33.1,	N/A ,
30 mins	5.6,	7.9,	9.1,	11.0,	12.3,	13.3,	16.5,	20.2,	22.7,	26.1,	29.2,	31.6,	35.3,	38.2,	40.6,	N/A ,
1 hours	7.4,	10.3,	11.8,	14.2,	15.8,	17.0,	21.0,	25.5,	28.4,	32.6,	36.2,	39.1,	43.5,	46.9,	49.7,	N/A ,
2 hours	9.7,	13.4,	15.4,	18.3,	20.2,	21.7,	26.6,	32.0,	35.6,	40.5,	44.9,	48.3,	53.5,	57.5,	60.8,	N/A ,
3 hours	11.4,	15.7,	17.9,	21.2,	23.4,	25.1,	30.5,	36.6,	40.6,	46.1,	51.0,	54.7,	60.4,	64.8,	68.5,	N/A ,
4 hours	12.9,	17.5,	19.9,	23.5,	25.9,	27.7,	33.7,	40.3,	44.5,	50.5,	55.7,	59.7,	65.9,	70.6,	74.5,	N/A ,
6 hours	15.1,	20.4,	23.2,	27.3,	30.0,	32.0,	38.7,	46.0,	50.8,	57.4,	63.2,	67.6,	74.4,	79.6,	83.9,	N/A ,
9 hours	17.8,	23.9,	27.0,	31.6,	34.6,	37.0,	44.4,	52.7,	58.0,	65.3,	71.7,	76.6,	84.0,	89.7,	94.4,	N/A ,
12 hours	20.0,	26.6,	30.1,	35.1,	38.4,	40.9,	49.0,	57.9,	63.6,	71.5,	78.4,	83.6,	91.6,	97.7,	102.7,	N/A ,
18 hours	23.5,	31.1,	35.0,	40.7,	44.4,	47.3,	56.3,	66.2,	72.6,	81.3,	88.9,	94.7,	103.4,	110.1,	115.6,	N/A ,
24 hours	26.4,	34.7,	39.0,	45.2,	49.2,	52.3,	62.2,	72.8,	79.7,	89.1,	97.2,	103.4,	112.8,	119.9,	125.7,	145.7,
2 days	32.9,	42.3,	47.1,	53.9,	58.3,	61.7,	72.3,	83.6,	90.8,	100.6,	109.0,	115.4,	124.9,	132.2,	138.1,	158.1,
3 days	38.5,	48.9,	54.0,	61.4,	66.2,	69.8,	81.1,	93.1,	100.7,	111.0,	119.8,	126.4,	136.3,	143.8,	149.9,	170.4,
4 days	43.5,	54.7,	60.3,	68.2,	73.3,	77.2,	89.1,	101.8,	109.7,	120.5,	129.6,	136.5,	146.8,	154.6,	160.8,	182.0,
6 days	52.7,	65.4,	71.6,	80.5,	86.1,	90.4,	103.6,	117.4,	126.0,	137.6,	147.4,	154.8,	165.8,	174.0,	180.7,	203.1,
8 days	61.0,	75.1,	81.9,	91.6,	97.7,	102.4,	116.6,	131.5,	140.7,	153.1,	163.5,	171.3,	183.0,	191.7,	198.7,	222.2,
10 days	68.9,	84.1,	91.6,	102.0,	108.6,	113.5,	128.7,	144.5,	154.3,	167.4,	178.4,	186.7,	198.9,	208.0,	215.4,	239.9,
12 days	76.4,	92.8,	100.7,	111.8,	118.8,	124.1,	140.2,	156.9,	167.2,	180.9,	192.5,	201.1,	213.9,	223.4,	231.1,	256.6,
16 days	90.8,	109.2,	118.1,	130.4,	138.2,	144.0,	161.8,	180.1,	191.3,	206.2,	218.8,	228.1,	241.9,	252.1,	260.4,	287.7,
20 days	104.4,	124.7,	134.5,	147.9,	156.4,	162.8,	182.0,	201.8,	213.9,	229.9,	243.3,	253.3,	268.0,	278.9,	287.6,	316.6,
25 days	120.9,	143.4,	154.1,	168.9,	178.2,	185.1,	206.1,	227.5,	240.5,	257.8,	272.3,	283.0,	298.7,	310.4,	319.7,	350.5,

NOTES:

N/A Data not available

These values are derived from a Depth Duration Frequency (DDF) Model

For details refer to:

'Fitzgerald D. L. (2007), Estimates of Point Rainfall Frequencies, Technical Note No. 61, Met Eireann, Dublin',

Available for download at [www.met.ie/climate/dataproducts/Estimation-of-Point-Rainfall-Frequencies\\_TN61.pdf](http://www.met.ie/climate/dataproducts/Estimation-of-Point-Rainfall-Frequencies_TN61.pdf)

**Annex 5 –  
Water Quality Monitoring Plan**





White Hill Wind Farm

# Planning-Stage Construction & Environmental Management Plan

## Water Quality Monitoring Plan

White Hill Wind Limited

Galetech Energy Services

Clondargan, Stradone, Co. Cavan Ireland

Telephone +353 49 555 5050

[www.galetechenergy.com](http://www.galetechenergy.com)



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## 1.0 Introduction

Galetech Energy Services (GES), on behalf of White Hill Wind Limited, has prepared this Water Quality Monitoring Plan (WQMP) to outline the procedures to be followed during the monitoring of surface waters prior to, during and post-construction of the White Hill Wind Farm.

### 1.1 Purpose of this Report

Many construction and industrial sites have the potential to cause a deterioration in downstream water quality through pollution events from hydrocarbons and siltation/sedimentation. The purpose of this report is to verify the efficacy of pollution prevention and mitigation measures implemented at the White Hill Wind Farm during construction.

This is a live document and will be updated by the appointed contractor prior to the commencement of development. Prior to the commencement of construction, the updated WQMP will be reviewed by the Environmental Manager (EM) and Ecological Clerk of Works (EcoW), as necessary, to confirm the appropriateness of the measures set out therein.

### 1.2 Requirement for Water Quality Monitoring

As described above, construction activities associated with the development of a wind farm can give rise to a risk of pollution. A deterioration in downstream water quality could arise from:-

- Land Slide;
- Fire;
- Leaking plant or equipment;
- Containment Failure;
- Overfilling of containment vessels;
- Wind-blown waste, litter or dust;
- Flooding on site;
- Leaking Portaloo;
- Fuel drips or spills during re-fuelling;
- Leak from fuel or chemical containers; and
- Failure of pumps and pipelines.

Any of these incidents could affect downstream surface waters which, in turn, could result in adverse effects on aquatic species and habitats.

### 1.3 Reference Documents

The production of this WQMP has been supported by best practice manuals and will be accounted for in the further development of the appointed contractor's detailed CEMP.

Other guidance documents have been used to develop this WQMP; including a Planning-Stage Construction & Environmental Management Plan, Spoil Management Plan, Surface Water Management Plan, and Environmental & Emergency Response Plan.

## 2.0 Description of the Project

White Hill Wind Limited intend to construct the White Hill Wind Farm which will consist of:-

- 7 no. wind turbines with an overall tip height of 185m, and all associated ancillary infrastructure;
- Upgrades to the turbine component haul route; and
- Construction of an electricity substation and installation of c. 15km of underground grid connection cable between the White Hill Wind Farm and the existing Kilkenny 110kV electricity substation; and
- All associated and ancillary site development, excavation, construction, landscaping and reinstatement works, including provision of site drainage infrastructure.

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. Forestry replant lands are located within County Monaghan; while candidate quarries which may supply construction materials are also located within counties Carlow and Kilkenny.

As well as the reference documents listed in **Section 1.3**, various environmental reports have been prepared for the development including:-

- Environmental Impact Assessment Report (Galetech Energy Services);
- Biodiversity Chapter (Ecology Ireland);
- Land & Soil Chapter (Hydro Environmental Services);
- Water Chapter (Hydro Environmental Services); and
- Natura Impact Statement (Ecology Ireland).

### 3.0 Responsibilities

#### 3.1 Contractor

The appointed Contractor will be responsible for employing an independent Environmental Manager (EM) to undertake all water quality monitoring and sampling prior to, during, and post-construction.

#### 3.2 Environmental Manager

The independent EM, appointed prior to construction, will be responsible for the implementation and coordination of the methods set out in this WQMP. Prior to construction, the Contractor will be instructed to provide a 'schedule of work' to the EM at the beginning of each week to determine the intensity of monitoring required.

The EM will prepare and deliver site induction and training to all construction personnel, in liaison with the Project Manager and Contractor.

The EM will:-

- Undertake specific monitoring activities and reporting in accordance with best practice;
- Undertake weekly visual inspections for signs of ground damage or solids escaping to nearby drainage features watercourses in vicinity of construction works;
- Undertake weekly visual inspections of the installed surface water management system (e.g. silt traps, silt ponds, settlement lagoons, check dams, and buffered outfalls) and other drainage features for evidence of contaminated run-off or drainage system failure;
- Collection and analysis of water samples at monitoring locations (upstream & downstream of the project site). The selection of water monitoring locations will

be agreed with the local authority (authorities) prior to the commencement of construction;

- Attend critical work phases including installation/construction of watercourse crossings, turbine foundation concrete pours, and grid connection Horizontal Direction Drilling (HDD) works.

#### 4.0 Water Sampling Methodology

The collection and analysis of water samples at the monitoring locations (i.e. upstream & downstream of project site) will be completed prior to, during and post-construction. The precise scope of monitoring will be agreed with the local authority (authorities) prior to commencement of construction works.

With respect to the proposed felling works, it is proposed that 1 no. round of sampling will be undertaken within 4-weeks of the commencement of felling which will provide a set of baseline results against which all subsequent samples can be assessed. Weekly-sampling will then be completed for the duration of the felling activities; while a minimum of 1 no. round of sampling will be completed following the felling operations. Sampling locations SW1 and SW2, as outlined in **Chapter 7** of the EIAR, will be selected as sampling locations for felling operations.

Additionally, daily surface water monitoring forms (for visual inspections and field chemistry measurements) will also be utilised at every works site near any watercourse. These will be taken daily and kept on site for record and inspection

With regards general construction activity, it is proposed that 1 no. round of sampling will be undertaken prior to the commencement of development which will provide a set of baseline results against which all subsequent samples can be assessed. Monthly-sampling will then be completed for the duration of the construction phase; while a further 1 no. round of sampling will be completed following the completion of construction and reinstatement activities. Sampling locations SW1-SW4, as outlined in **Chapter 7** of the EIAR, will be selected as sampling locations for the duration of the construction phase.

As a minimum, the general monitoring programme will include:-

- 1 no. baseline sample (by the EM);
- Daily visual observation in areas of high construction activity (by a suitably trained staff-member) or during high rainfall periods to identify any evidence of siltation, oil or silt. Visual inspections will include details of the colour of the water at the time of inspection;
- Weekly visual inspections and monthly field hydrochemistry (by the EM); and
- One round of post construction monitoring (by the EM).

Monitoring locations will be identified through grid reference, photographic record and indicated on a drawing. Each location will be marked on the ground (stake/post) to ensure that the correct location is sampled each time during repeat sampling locations.

For the duration of the monitoring period, sample locations shall be consistently identified and any additional locations will be recorded and a photograph taken at the time of sampling.

'Control' sample locations may also be included in the scope of any monitoring.

## 4.1 Hydrochemistry

In addition to the visual inspections described above, all water samples will be subject to hydrochemistry analysis. The parameters to be analysed will be agreed with the local authority (authorities) prior to the commencement of construction, and may include:-

- pH;
- Temperature;
- Total Suspended Solids (TSS);
- Dissolved Organic Carbon (DOC);
- Conductivity;
- Dissolved Oxygen (DO);
- Total Oxidized Nitrogen (TON);
- Ammoniacal Nitrogen;
- Ammonia;
- Potassium;
- Phosphate;
- Biological Oxygen Demand (BOD);
- Chemical Oxygen Demand (COD); and
- Total Petroleum Hydrocarbons (TPH) (Construction Phase only).

## 5.0 Reporting

Each month, the EM will prepare a report on the results of the water quality monitoring. The results will assist in determining the requirements for improvements in drainage, surface water management, and pollution prevention measures.

The EM will also present the results to staff and construction personnel to ensure full awareness of any necessary improvements. This shall be done at monthly-meetings and reported within the overall Monthly Environmental Report to be prepared by the EM. The monthly reports on water quality will be provided to White Hill Wind Limited and will be made available to the local authority (authorities), as may be necessary.

The monthly reports on water quality will consider all visual, field monitoring and results of laboratory analysis undertaken that month. Reports will describe how the results compare with baseline data as well as previous monthly reports on water quality. The reports will describe whether any deterioration or improvement in water quality has been observed and whether any effects are attributable to construction activities and what remedial measures or corrective actions have been, or are required to be, implemented.

Upon completion of all post-construction monitoring, the EM will prepare a final report on water quality. This will detail the overall performance against baseline data, details on any impacts attributed to construction works and recommendations for remedial works if required. The final report will be provided to the local authority (authorities).

## 6.0 Emergency Response

In the event that a pollution incident arises from construction works; such as that resulting from a spill or accidental release of chemicals, oils and fuels or concrete effluent; which threatens to enter, or has entered, a watercourse, additional sampling and analysis of surface water samples will be undertaken to determine the level of impact and whether remedial measures are required.

Where a pollution incident has occurred as a result of construction works, the EM will consult with the local authority (authorities) to determine sampling requirements and any additional survey requirements. Where it is demonstrated that the pollution occurred as a result of non-compliance with measures set out in project documentation (including the Environmental Impact Assessment Report, Natura Impact Statement, Construction Environmental Management Plan, and Surface Water Management Plan), the costs of any additional sampling or remedial measures shall be borne, in full, by the Contractor.

