



Energy, Environment & Safety

February 8th, 2013

Sonja Smith
Administration Officer
Office of Climate, Licensing & Resource Use
EPA
PO Box 3000
Johnstown Castle Estate
Co Wexford



Our Ref: **L1_EPA_20130206**
Re: **IPPC Reg. No: P0914-01 Westland Horticulture**
Section 83(1)(b) Request for Environmental Impact Statement

Dear Mr. McEntagart,

Further to the Agency's request to Westland Horticulture to submit an Environmental Impact Statement (Letter Ref. No. P0914-01 of 18 January 2013) and our subsequent telephone conversation, I can confirm that we wish to request an extension of the 3 month time frame specified in that letter for submission of the EIS.

An Environmental Impact Assessment (EIA) on harvesting and associated activities at company's operations at Lower Coole, Mayne, Ballinealoe and Clonsura, Co. Westmeath is required to be undertaken.

Both sites have not yet been extensively surveyed from an environmental perspective and arising from your request, we are undertaking an internal scoping of the key environmental attributes which will require detailed assessment as part of the EIA process.

Broadly speaking, although all EIA topics will be addressed, the focus of our site work and detailed impact assessment will be on the hydrology and ecology (including avian ecology) aspects of the sites. Fieldwork on both these topics has a seasonal component, and survey work will be required to cover broadly defined summer and winter periods.

At this point, the summer survey period, from an ecological perspective, will run through to the end of August.



FBD House, Fels Point, Tralee, Co. Kerry
p: 066 7128321 f: 066 7180061 e: info@oes.ie w: www.oes.ie

Similarly, the continuation of hydrology field work throughout the summer increases the knowledge base on water levels.

Accordingly, in order to compile the relevant baseline ecological information survey work will not be finalized before August, with reporting and impact assessment taking place during September.

Allowing time for this work to be undertaken, we envisage completion of the EIS during late September/October with submission shortly thereafter.

Accordingly, we request an extension of the order of nine months to allow the undertaking of required field surveys and assessments, and compilation, review and issue of the EIS thereafter. The completion of summer surveys during August is in line with relevant guidance for ecological assessments, and would be reasonably expected for these types of project. The guidelines include those issued by the Agency on EIA together with ecology specific guidance from *The Heritage Council (Habitat Survey Guidelines: A Standard Methodology for Habitat Survey and Mapping in Ireland)*, *NRA (Ecological Surveying Techniques and Guidelines for Ecological Impact Assessment)* and *Institute of Ecology and Environmental Management (IEEM) (Guidelines for Ecological Impact Assessment)*.

Any variation or abbreviation of survey periods which may arise during consultation or through scoping will be discussed and agreed with the Agency in advance.

Taking account of the timescales envisaged for completion of the field work and EIS, we request a Scoping Meeting with the Agency in order that the content and detail of our assessments may be finalized. IN addition, we would seek input from the Agency on a proposed list of statutory and non statutory Consultees.

We will contact you over the coming days to arrange suitable date and time for a scoping meeting.

Yours Sincerely,



Peadar O'Loughlin
Managing Director

CC **John McEntagart**,
OCLR, EPA – RI, Richview, Clonskeagh D 14
Mark Hamill
Westland Horticulture, Granville Ind. Est., Dungannon, Co. Tyrone