



An  
Bord  
Pleanála

## Inspector's Addendum Report ABP-306303-20

### Development

Decommissioning and removal of 25 x wind turbines and construction of 13 x turbines and all associated works, upgrade of existing 110kV grid connection & widening of junctions.

### Location

Keadew Upper, Cullinoboy & Clogher, County Donegal.

### Planning Authority

Donegal County Council

### Applicant(s)

ScottishPower Renewables Ltd.

### Type of Application

Strategic Infrastructure Development

### Board Request

Further consideration of Appropriate Assessment

### Inspector

Karla Mc Bride

**This report should be read in conjunction with the Inspectors Report ABP-306303-20 dated 13<sup>th</sup> November 2020.**

## **1.0 Introduction**

- 1.1. The Board requested an update of the Inspector's report providing for a comprehensive Appropriate Assessment.
- 1.2. The Appropriate Assessment is set out in Section 7.0 of the Inspector's report dated 13<sup>th</sup> November 2020 and section 7.3 deals with Screening for AA. Section 7.3 notes that the main issues related to ecology and the concerns raised by the Observers are summarised and addressed in section 4.0 of this report and section 6.0 contains an environmental impact assessment, and that sections 6.8 to 6.10 of the report should be read in conjunction with this assessment.
- 1.3. Section 7.3 notes that the proposed development would not be located within an area covered by any European site designations and that it is not relevant to the maintenance of any such sites. It lists 15 European sites that are located within a 15km radius of the windfarm site along with their relevant Qualifying Interests/ Special Conservation Interests, the approximate separation distances from the site and whether there is an aquatic or mobile link between the windfarm site and the European sites.
- 1.4. Section 7.3 identifies the potential effects on the European sites as:
  - Transport of pollutants in ground or surface water flowing into the European sites via on-site tributaries.
  - Ex-situ impacts on qualifying species outside the European sites but which are an integral and connected part of the population of qualifying interest species such as Otter.
  - Loss of foraging lands and interference with flight lines of bird species associated with the European sites, or mortality related to collision with turbines.

1.5. Section 7.3 notes that there is a potential aquatic connection with 4 x SACs and a potential mobile or aquatic connection with 4 x SPAs. This conclusion is based on an examination of maps and aerial imagery, the survey data provided by the applicant and the information contained in relevant NPWS documentation. Seven European sites are screened out from any further consideration because of the nature of the European site, the absence of relevant Qualifying Interests downstream of the works, and the absence of an aquatic connection between the European site and the windfarm site.

1.6. The relevant details for the 8 x remaining European sites are summarised below.

<b>SACs</b>	<b>Site code</b>	<b>Relevant QIs</b>	<b>Separation distances</b>	<b>Aquatic link</b>
<b>Lough Eske &amp; Ardnamona Wood</b>	000163	Oligotrophic waters Atlantic salmon Freshwater PM	c.3km W c.0.3 km W of road works	Yes Yes
<b>River Finn</b>	002301	Oligotrophic waters Peatland habitats Atlantic salmon Otter	c.7 km NE c.8km SE	Possible Yes
<b>Donegal Bay (Murvagh)</b>	000133	Mudflats & sandflats Dunes & slacks Harbour seal	c.10 km SW	Yes
<b>River Foyle &amp; Tributaries</b>	003032 0 (UK)	Floating river veg Atlantic salmon Otter	c.15 km E	Yes
<b>SPAs</b>	<b>Site code</b>	<b>Conservation Interests</b>	<b>Separation Distances</b>	<b>Mobile/aquatic links</b>
<b>Pettigo Plateau Nature Reserve</b>	004099	Greenland White-fronted Goose	c.4 km S	Yes
<b>Lough Derg (Donegal)</b>	004057	Lesser BB Gull Herring Gull	c.7 km SE	Yes
<b>Donegal Bay (Murvagh)</b>	004151	Great N Diver Brent goose Common scoter Sanderling Waterbirds	c.10 km SW	Yes
<b>Lough Nillan Bog</b>	004110	Merlin & Dunlin Golden plover Greenland WFG	c.14 km NW	Yes

1.7. Based on an examination of maps and aerial imagery, the survey data provided by the applicant, habitat and species information contained in relevant NPWS and Birdwatch Ireland reports, and the guidance provided by several publications including the SNH Guidance Assessing Connectivity with SPAs Version 3 (2016) document. I am satisfied that a further 3 sites can be screened out of any further assessment for the following reasons.

1. **Donegal Bay (Murvagh) SAC:** This SAC is located c.10km to the SW of the windfarm site. The site is ultimately connected to the SAC via on site drainage ditches and watercourses that drain into the Lowerymore River which flows into the SE section of Lough Eske, that in turn discharges to Donegal Bay via the River Eske in the SW section of the lough. The Qualifying Interest habitats and species for this SAC comprise mudflats and sandflats, various dune systems and harbour seal. Having regard to the substantial separation distance between the proposed works and this SAC, the intervening presence of a large water body (Lough Eske), the degree of tidal mixing that occurs in the estuary, and the nature of the Qualifying Interests habitats and species (which are mainly terrestrial), I am satisfied that this SAC can be screened out from any further consideration as there is no potential for any adverse effects on water quality, and in turn QI habitats and species in the Bay.
2. **Donegal Bay SPA:** This SPA is also located c.10km to the SW of the windfarm site and there is potential for a possible mobile connection between this European site and the windfarm site. The Special Conservation Interest species for this SPA comprise Great Northern Diver, White-bellied brent goose, Common scoter, Sanderling, and Wetland and Waterbirds. However, it is noted by NPWS and BirdWatch Ireland that most of these species are wintering and not normally connected with upland sites.
  - **Great northern diver:** do not breed in Ireland, they mainly eat fish and can forage up to 10km offshore in search of food.
  - **White-bellied brent goose:** do not breed in Ireland, they mainly feed on eelgrass in muddy estuaries but also grasslands when supplies are low.

- **Common scooter:** recorded breeding in Ireland at Lower Lough Erne and they nest on islands, they mainly feed on benthic bivalve molluscs and are almost entirely marine during the winter.
- **Sanderling:** do not breed in Ireland, they mainly feed on small invertebrates along the tidal edge and are mostly found along sandy coastlines.
- **Wetland & waterbirds:** although the occasional presence of some species was noted during the applicant's surveys, the upland site does not contain suitable foraging, roosting or nesting habitat.

Having regard to the substantial separation distance between the proposed works and this SPA, the upland nature of the site which does not contain suitable foraging or nesting habitats, and the characteristics of the Special Conservation Interest species (which are coastal), I am satisfied that this SPA can be screened out from any further consideration as there is no potential for any adverse effects on bird species. Furthermore, having regard to the conclusions reach in relation to the Donegal Bay (Murvagh) SAC above, I am also satisfied that there is no potential for any adverse effects on water quality, and in turn food resources (including prey species) for SCI species within the Bay.

3. **Lough Nillan Bog SPA:** This SPA is located c.14km to the NW of the windfarm site. The Special Conservation Interest species comprise Merlin, Dunlin, Golden plover, and Greenland white-fronted goose, and the upland windfarm site provides suitable foraging habitat. The occasional presence of some of these species on the site during the applicant's surveys suggests that there is potential for a possible mobile connection between this SPA and the windfarm site. However, it is noted that this European site is located significantly outside of the core foraging range of these bird species as indicated in the SNH Guidance Assessing Connectivity with SPAs Version 3 (2016) document. Although some species were recorded on the site during the surveys, I am satisfied that it is unlikely that they originated in the Lough Nillan SPA, and that there is no potential for any adverse effects.

- 1.8. Section 7.3 concludes that the 5 relevant European sites that remain after the AA Screening exercise are:

SACs	SPAs
Lough Eske & Ardnamona Wood SAC	Pettigo Plateau Nature Reserve SPA
River Foyle & Tributaries SAC	Lough Derg SPA
River Finn SAC	

### AA Screening Conclusion

In conclusion, having regard to the nature and scale of the proposed development, to the separation of the windfarm site from the European sites, to the nature of the qualifying/conservation interests and conservation objectives of the European sites and to the available information as presented in the EIAR regarding ground and surface water pathways and mobile connections between the windfarm site and the European sites, and other information available, it is my opinion that the proposed development has the potential to affect 5 of the European sites having regard to the conservation objectives of the relevant sites, and that progression to a Stage 2 Appropriate Assessment is required.

### 1.9. Conclusion

I am satisfied that the further consideration of the Appropriate Assessment contained in Section 7.0 would not give rise to any changes to the conclusions reached by the Inspector in respect of the report dated 13<sup>th</sup> November 2020.

## 2.0 Recommendation

Having regard to the foregoing, I am satisfied that there is adequate information before the Board to enable it to continue with its deliberations in relation to the proposed windfarm development.

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Karla Mc Bride

Senior Planning Inspector

18<sup>th</sup> December 2020

