An Bord Pleanála

Inspector's Addendum Report

ABP-318041-23

Development	10 Year Permission for solar farm development on 73.9 hectare site for operational period of 35 years together with all ancillary works. An NIS has been submitted with the application.
Location	Ballyteigue Little and Derrygrogan Big, Tullamore, County Offaly.
Planning Authority	Offaly Co Council.
Planning Authority Reg. Ref.	22378
Applicant(s)	Renewable Energy Systems (RES) Ltd.
Type of Application	Permission.
Planning Authority Decision	Grant
Type of Appeal	Third Party
Appellant(s)	(i) Kieran & Audrey Mann. (ii) Liam Quinn. (iii) Gerry Feery. (iv) Sharron Feery.

Observer(s)	Helena Quinn.
Date of Site Inspection	15th January 2024
Inspector	Paul Caprani

Contents

1.0 Introduction

1.1. This report is an addendum report to the Inspector's report in respect of ABP-318041 dated 19th March 2024

1.2. In accordance with the Board Direction dated 22/04/2024; The board decided to *"defer this case for consideration at a further Board meeting. The Board also decided to request that the inspector provide additional analysis for the purpose of enabling further consideration by the Board of the project in reference to appropriate assessment"*

1.3. In response to the Board's Direction above, please see additional analysis in relation to appropriate assessment below.

2.0 Appropriate Assessment

2.1. Introduction

The requirements of Article 6(3) as related to appropriate assessment of a project under part XAB, sections 177U and 177V of the Planning and Development Act 2000 (as amended) are considered fully in this section. The areas addressed in this section are as follows:

- Compliance with Article 6(3) of the EU Habitats Directive.
- The Natura Impact Statement and associated documents.
- Screening the need for appropriate assessment.
- Appropriate assessment of implications of the proposed development on the integrity each European site.

Compliance with Article 6(3) of the EU Habitats Directive

The Habitats Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) of this Directive requires that any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either

individually or in combination with other plans or projects shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. The competent authority must be satisfied that the proposal will not adversely affect the integrity of the European site before consent can be given.

The proposed development is not directly connected to or necessary to the management of any European site and therefore is subject to the provisions of Article 6(3).

2.1.1. The subject site comprises an area of c.73.9 ha comprising of approximately 18 agricultural fields (both pastural and arable) bounded by hedgerows, 6km east-north-east of Tullamore. The proposed development is located within the townlands of Ballyteigue Little and Derrygrogan Big. A small local road traverses the site.

2.1.2. The proposed development comprises of the construction of solar PV Panels mounted on metal frames together with new access tracks, control building, underground cabling, perimeter fencing and CCTV cameras. A maximum height of the panel will be 3 metres above ground level. This will include a 0.5 metre high clearance to enable maintenance access beneath the panels. Also to be included will be 21 inverter substations located along the internal access tracks. Each of these substations will require a hardstanding area of 16 metres x 16 metres. These transformers will convert the current and will uprate the voltage from low voltage to high voltage as required by the electricity grid connection.

2.1.3. The site is located within the WFD River Sub Basin – "Tullamore _030" and within the WFD Sub-catchment_SC_010. The Ballyteige Little watercourse is located off site but is connected to the site via the western boundary of Field 13. This watercourse links up with the Tullamore River c 2km to the south The Ballyteige Little watercourse has been assigned a Status of 'Poor'. The Tullamore River flows westwards towards the Town. To the east of the Town the Tullamore River has been assigned a Q Value 3 with an assigned Status also of 'Poor'. Further west beyond the town, the water quality improves with the Tullamore River being assigned a Status of 3-4, 'Moderate'.

2.1.4. <u>Surveys Undertaken</u>

2.1.5. A Fossitt habitat survey was undertaken on the 27th & 28th May and July 9th 2021. An additional survey was carried out on 25th August 2021. The site was surveyed for evidence of protected species, including those qualifying species of the 2000 designated sites within the zone of influence of the proposed development.

2.2. Natura Impact Statement

2.2.1. The applicant has submitted an NIS with the Application. The NIS set out in detail the assessment methodology and identifies the study zone based on the source – pathway -receptor model. The NIS identifies all the Natura 2000 sites within the zone of influence of development. The 7 sites identified include 6 SAC's and 1 SPA between 3.8km and 14.8km form the subject site.

2.2.2. Of the 7 sites referred to above, two of the sites were initially screened in, as both were hydrologically connected with the subject site, namely the River Barrow and River Nore SAC 12.3 km to the south of the subject site, and the Charleville Wood SAC 7.7 km to the south-west of the subject site. Further analysis however ruled out any potential impacts on the Chareville Wood site, due to inherent design measures of the project, the nature of the qualifying interests, the separation distance and the dilution, dispersion and assimilative capacity of the watercourse linking the site with the SAC in question. Potential impacts on the River Barrow and River Nore SAC, despite being a further distance was screened in, on the basis of the presence of the otter as a qualifying interest. Otters have foraging and commuting patterns that stretch beyond the confines of the SAC and may be impacted through disturbance as well as loss of habitat through the contamination of surface waters. The NIS goes on to identify some common water pollutants associated with contamination. The statement identifies the qualifying interests, conservation objectives, threats and pressures that could affect the integrity of the River Barrow and River Nore SAC. Mitigation measures are set out in section 1.91 of the NIS. These measures include pollution prevention measures, noise and vibration measures, dust mitigation measures and drainage mitigation measures. Protocols will also be put in place for the storage of fuels and chemicals waste segregation, excavation, and earthworks and monitoring arrangements. With the employment of the above measures, it concludes that no impacts on the otter or other qualifying interests associated with the SAC are identified.

2.2.3. The cumulative impact assessment assesses any potential in combination effects with both plans and projects. Reference is made to the policies contained in the various national regional and local plans including the county development plan. In terms of projects, three projects are identified all of which are solar farms located within 5 km of the subject site it is noted that these projects have also been the subject to an appropriate assessment screening where it was found that the projects would not give rise to any effect on the integrity of the River Barrow and River Nore SAC.

2.2.4. The NIS concludes "*that the proposed development will not adversely affect the integrity of any Natura 2000 designated site due to the measures incorporated during the design phase and following relevant guidance to prevent pollution during the construction and operational phases*".

2.2.5. Below is my independent assessment of the potential impacts of the proposed development of Natura 2000 Sites in the vicinity. In carrying out my independent appropriate assessment, I have considered the Solar Farm in light of the requirements of S177U of the Planning and Development Act 2000 (as amended).

2.3. **Stage 1 Screening.**

2.3.1. The development site is not located within or immediately adjacent to any Natura 2000 Site. The relevant Sites within the wider area are set out below:

2.3.2.

Site Code	**Site Name**	**Qualifying Interests**	**Distance Km**	**Direction**	**Potential Connectivity**
000582	Raheenmore Bog SAC	Active raised bogs [7110] Degraded raised bogs still capable of natural regeneration [7120] Depressions on peat substrates of the Rhynchosporion [7150]	3.8	Northeast	None

001831	Split Hills and Long Hill Esker SAC	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]	6.83	North	None
000571	Charleville Wood SAC	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] Vertigo moulinsiana (Desmoulin's Whorl Snail) [1016] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] Vertigo moulinsiana (Desmoulin's Whorl Snail) [1016]	7.7	Southwest	Weak Hydrological Connection c9.3 km from the subject site.
000572	Clara Bog SAC	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] Active raised bogs [7110]	12	Northwest	None

		Degraded raised bogs still capable of natural regeneration [7120] Depressions on peat substrates of the Rhynchosporion [7150] Bog woodland [91D0]			
002162	River Barrow and River Nore SAC	Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Reefs [1170] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410] Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260] European dry heaths [4030] Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430]	12.3	South	Based on a precautionary principle the SAC is screened in as the solar farm site is located within the foraging and commuting range of the otter, a qualifying interest associated with the SAC. The Site is located in a separate river catchment and is not hydrologically connected to the SAC.

		Petrifying springs with tufa formation (Cratoneurion) [7220] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] Vertigo moulinsiana (Desmoulin's Whorl Snail) [1016] Margaritifera margaritifera (Freshwater Pearl Mussel) [1029] Austropotamobius pallipes (White-clawed Crayfish) [1092] Petromyzon marinus (Sea Lamprey) [1095] Lampetra planeri (Brook Lamprey) [1096] Lampetra fluviatilis (River Lamprey) [1099] Alosa fallax fallax (Twaite Shad) [1103] Salmo salar (Salmon) [1106] Lutra lutra (Otter) [1355] Trichomanes speciosum			

		(Killarney Fern) [1421] Margaritifera durrovensis (Nore Pearl Mussel) [1990]			
004044	Lough Ennell SPA	Pochard (Aythya ferina) [A059] Tufted Duck (Aythya fuligula) [A061] Coot (Fulica atra) [A125] Wetland and Waterbirds [A999]	14.8	North	None

2.3.3. It note that there is no ecological justification for the inclusion of all sites in such a wide geographical area, having particular regard to the nature of the proposed development, the intervening land uses, the fact that many of the sites are located in different catchment areas and therefore will not be negatively affected by any potential contamination of surface waters or groundwater or in siltation arising from construction or ground clearance works. On this basis I have assessed the information in the NIS and I note that 5 of the sites in question are located in a different water catchment and sub catchment areas and therefore are not hydrologically connected with the subject site. Therefore no aquatic species or water dependant qualifying interests which form qualifying interest of the 5 Natura 2000 sites where there is no hydrological connection, could be potentially impacted by the proposal. Furthermore, I note that there are no other qualifying interests in the form of habitats associated with these Natura 2000 Sites that could otherwise be potentially affected by the proposal. These sites which can be screened out for the purposes of a stage 2 appropriate assessment are on the basis of the separation distances involved and that there are no hydrological connections are:

- Raheenmore Bog SAC [000582]
- Split Hills and Long Hill Esker SAC [001831]

- Clara Bog SAC [000572]
- Lough Ennell SAC [7230]
- Lough Ennell SPA [004044]

2.3.4. I have therefore only included those sites with any possible ecological connection or pathway in this screening determination.

There are 2 European Sites that could be potentially impacted upon. These sites and the Qualifying interests associated with these site are set out in the Table below:

Site Code	Site Name	Distance	Potential Connectivity	Screen In/Out
000571 SAC	Charleville Wood Qualifying Interests Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] Vertigo moulinsiana (Desmoulin's Whorl Snail) [1016]	7.7km - WSW	This woodland is located to the west of Tullamore Town and is located within the same sub-catchment as the subject site. A number of streams in the vicinity of the site flow south towards the Tullamore River which in turn flows west to the immediate north of the woodlands. On the basis of the precautionary principle there may be a indirect hydrological between the subject site and the SAC, and this needs to be explored further in order to determine whether or not this site should be taken to a stage 2 appropriate assessment.	Out (see below)
002162	River Barrow and River Nore SAC Qualifying Interests Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Reefs [1170] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows	12.3 km - South	There is no hydrological connection, SAC is located in a different WFD catchment and sub catchment. However one of the QI associated with this SAC is the Otter. This species commutes along river channels and forages significantly beyond the boundary of the SAC and the range and extent of commuting can be up to 40km. For this reason and based on the precautionary principle, this SAC is screened in for further assessment.	In

	(Glauco-Puccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410] Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260] European dry heaths [4030] Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430] Petrifying springs with tufa formation (Cratoneurion) [7220] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] Vertigo moulinsiana (Desmoulin's Whorl Snail) [1016] Margaritifera margaritifera (Freshwater Pearl Mussel) [1029] Austropotamobius pallipes (White-			

	clawed Crayfish) [1092] Petromyzon marinus (Sea Lamprey) [1095] Lampetra planeri (Brook Lamprey) [1096] Lampetra fluviatilis (River Lamprey) [1099] Alosa fallax fallax (Twaite Shad) [1103] Salmo salar (Salmon) [1106] Lutra lutra (Otter) [1355] Trichomanes speciosum (Killarney Fern) [1421] Margaritifera durrovensis (Nore Pearl Mussel) [1990]			

Charleville Wood SAC

Conservation Objectives for the Charleville Wood SAC

Alluvial Woodland

(a) "To restore the favourable conservation condition of Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) in Charleville Wood SAC, which is defined by the following list of attributes and targets":*

- *The area is stable or increasing subject to natural processes.*
- *The is no decline in the habitat distribution subject to natural processes.*
- *The Woodland size is stable or increasing where topographically possible*
- *In terms of woodland structure and height the Total canopy cover at least 30%; median canopy height at least 7m; native shrub layer cover 10-75%;*

native herb/dwarf shrub layer cover at least 20% and height at least 20cm; bryophyte cover at least 4%.

- *Various other indicators in relation to protection of the woodland*

The development is located c9.3 km away for the woodland in question and, due to this separation distance, the proposal will in no way impact on the conservation objectives associated with the Alluvial forests in the riparian area associated with the Tullamore River. This habitat is quite resilient to any potential changes in water quality, certainly any changes in water quality downstream that might, under a worst case scenario, result from the construction phase of the proposed development. There will be negligible changes in water quality discharge during the operational phase of the project, and for this reason and having regard to the separation distances involved, there will be no impact on the alluvial woodland during the operational phase of the development.

Desmoulins Whorl Snail

To maintain the favourable conservation condition of Desmoulin's Whorl Snail (Vertigo moulinsiana) in Charleville Wood SAC, which is defined by the following list of attributes and targets:

The favourable conservation condition of the Desmuolins Whorl Snailis Achieved when:

- *No decline in distribution , subject to natural processes. There is one known site for this species in the SAC No decline, subject to natural processes. There is one known site for this species in the SAC.*
- *There is no decline in occurrence, subject to natural processes. A baseline figure of 50% positive samples is set.*
- *In terms of density within the habitat - no decline, subject to natural processes; at least 67% of samples should have more than 20 individuals.*
- *Area of suitable habitat stable or increasing, subject to natural processes; no less than 5ha of at least sub-optimal habitat*
- *Maintain tree canopy at current levels*
- *Maintain hydrological regime at current levels.*

A somewhat circuitous hydrological route links the subject site with the SAC in question. The Ballyteige Little water course which runs along the western boundary of the site flows into the Tullamore River to the south which in turn flows westwards and along the northern boundary of the SAC.

The Desmoulin whorl snail is a terrestrial species lives on the fringe of rivers lakes and wetlands and would be considerably more sensitive to potential changes in water quality than the alluvial woodland. However I would agree with the statement in the NIS that the inherent design approach in the layout of the solar farm, which includes adequate separation distance from water courses together with the dilution, dispersion and assimilative capacity of the water courses that link the site and the SAC would be such, that were a pollution episode to occur on site in the absence of any mitigation, the impacts downstream at the SAC would not result in any adverse effect on the Desmoulin whorl snail. The level of dilution, dispersion and assimilation available in the receiving waters would be such that the hydrological regime associated with the receiving waters as specified in the above conservation objective would not be affected in any way by the proposal.

On this basis, and notwithstanding the fact that there is a hydrological connection between the subject site and the Charleville Wood SAC, I would agree with the conclusion in the NIS that the Charleville Wood SAC can be screened out for the purposes of a stage two appropriate assessment as the proposed development, even in the absence of mitigation measures would not give rise give to significant effects on the qualifying interests of the Charleville Wood SAC, in light of the conservation interests associated with the SAC.

On the basis of the above, the only Natura 2000 Site that should be brought forward for a Stage Two appropriate assessment is the River Barrow and River Nore SAC (Site Code 002162)

2.4. Appropriate Assessment of the Implications of the Proposed Development

A single European Site has identified as being located within a potential zone of influence the River Barrow and River Nore SAC [Site Code 002162]. And this site has been brought forward to a Stage 2 appropriate assessment, solely on the basis that that the otter, a qualifying interest of the SAC could use lands in the vicinity of

the site for foraging and commuting purposes and the impact of the development on this species is subject to further assessment below.

The SAC in question is not located within the same river basin catchment area as the subject site. As such there is no hydrological connection and therefore any habitats or aquatic species that form qualifying interests within the boundary of the River Barrow and River Nore SAC will not in anyway be affected by the proposed development. The foraging and commuting patterns of otter however can extend beyond the boundary of an SAC, for a distance of up to 40km from the otter holt. Works within the site therefore could potentially impact on the otter.

I concur with the applicants' findings that such impacts could be significant in terms of the stated conservation objectives of the SAC when considered on their own and in combination with other projects and plans in relation to pollution related pressures and disturbance on the otter.

Conservation Objectives for the Otter in the River Barrow and River Nore SAC

To restore the favourable conservation condition of Otter in the River Barrow and River Nore SAC, which is defined by the following list of attributes and targets:

- *Distribution – No significant decline.*
- *Terrestrial habitat area - No significant decline. Area mapped and calculated as 122.8ha above high water mark (HWM); 1136.0ha along river banks / around ponds*
- *Marine habitat area - No significant decline. Area mapped and calculated as 857.7ha*
- *Extent of freshwater habitat - No significant decline. Length mapped and calculated as 616.6km.*
- *Extent of freshwater (lake) habitat - No significant decline. Area mapped and calculated as 2.6ha*
- *Couching sites and holts – no significant decline.*
- *Fish biomass available – no significant decline.*

2.5. Predicted Potential Impacts

Any water pollution, noise or other types of disturbance, in the absence of mitigation could impact on the otter species, should it forage or commute in the vicinity of the site.

Sources of impact include:

- Release of silt and sediment during site works to make the site suitable for the installation of the solar panel structures. While this development type does not involve major ground works, some land levelling is required, particularly along the periphery of the proposed site which may, in unmanaged and wet conditions contribute to increased sediment load to receiving water features.
- Release of construction related compounds including hydrocarbons, cement or other fuels or chemical used in the construction process to surface water
- Spread of invasive plant species including Himalayan balsam which was recorded on the development site.

The impacts described above primarily relate to water quality impacts, I am satisfied having regard to the River Basin Management Catchment Areas, that the River Barrow and River Nore SAC is not hydrologically connected to the subject site and therefore no impacts will arise form the construction or operational phase of the proposed solar farm on water quality associated with the aquatic species that form part of the SAC. Potentially were the otter to forage or commute in the vicinity of the subject site, a water pollution episode during the construction phase, or less likely during the operational phase, it could potentially affect the species. For this reason measures will be taken to limit the possibility of pollution entering the aquatic environment.

Increased human disturbance at this site, particularly during the construction/ installation phase may cause disturbance to the Otter if commuting or foraging in the vicinity of the subject site. This disturbance may relation to excessive noise, dust or light pollution. It is this latter impact that could potential impact on the foraging and commuting habitat of the otter.

2.6. **Mitigation Measures**

2.6.1. The NIS sets out a host of measures specifically end to ensure that the receiving environment is not adversely affected by the proposed development thereby protecting the offer. These include the following:

Integral Design Measures

- The incorporation of buffer zones of 5 meters from drainage ditches to inhibit any construction debris from entering water courses.
- Incorporating buffer zones from woodland habitat outside the red line boundary
- The incorporation of mammal gates to allow the free movement of Otter throughout the site

Standard Best Practice Mitigation Measures

- Best practice pollution prevention measures throughout the construction phase
- All excavations to be securely covered at the end of each working day
- Pre commencement survey for any evidence of otters within our in the vicinity of the site.

Pollution Prevention Measures

Suitable protection of water courses to prevent water pollution prior to the development commencing. These measures will be in accordance with EPA Guidelines and will include:

- Locating all plant and equipment will be stored on dedicated hardstanding within the construction compound.
- Regular inspections and monitoring of machinery.
- All plant will utilise biodegradable oil.
- Fuel will be stored in bunded areas, and chemicals in a secure area and refuelling will take place in designated areas of hardstanding.
- Temporary staff toilets will be proposed on site and effluent will be collects and disposed via licenced contractors.

- Implementing an emergency spill and pollution response plan in the event of a spill or accident on site.
- SuDS will be employed as part of a best practice drainage measure
- If considered necessary silt fencing, straw bales or sand bags will be deployed to combat excessive silt discharge into drainage channels.

Noise and vibration mitigation measures

- All machinery will comply with BS 5228 in terms of noise emissions.
- Operation of plant including the fitting and proper maintenance of silencers.
- Confining traffic movements to normal business hours.

Dust Prevention Measures

- Installation of a wheel wash on site.
- Dust generating activities will be avoided or minimised during windy periods.
- Stockpiles will be covered when left for extended periods of time.
- Loads in and out of the site will be covered.

Evaluation of Potential Effects of the Solar Farm on the Otter Species

It should be noted that the site walk-over carried out as part of the ecological survey, did not uncover any evidence of otter. The environment in which the site is located, working agricultural lands surrounded by hedgerows and shallow drainage ditches, are considered to be sub-optimal for otter, there are no significant water courses within the site which would be suitable for foraging. However otters may potentially commute with the vicinity of the site. Post construction the development will ensure the retention of habitats. I am satisfied however, beyond all reasonable scientific doubt that were the above mitigation measures put in place, in the unlikely a otter forages or commutes in the vicinity of the site, there would be no adverse impact resulting from the development.

In-Combination Effects

I consider that the applicant has correctly identified the projects in the vicinity which could potentially give rise to cumulative impacts, namely the proposed solar farms identified. There are no other plans or projects in my view that could give rise to cumulative effects. Other developments in the area are small scale agricultural and

residential developments which would not give rise to significant cumulative effects. The surrounding lands will remain predominantly in agricultural use. The other solar farms in question have also been subject to appropriate assessment which resulted in a finding of no significant effects. With the employment of mitigations measures associated with the current application before the Board, it is my reasoned conclusion that the proposed development will not give rise to significant effects on the otter. And having regard to the findings of no significant effects of the appropriate assessments carried out in the case of the other solar farms referred to in the NIS (Planning References 2198, 218 and 18167), together with the findings of no significant effects in the case of the current application, I would reasonably conclude that no cumulative impact will arise.

Integrity Test

Following the appropriate assessment and the consideration of mitigation measures, I am able to ascertain with confidence that the project would not adversely affect the integrity of River Barrow and River Nore SAC in view of the Conservation Objectives of this site.

This conclusion has been based on a complete assessment of all implications of the project alone and in combination with plans and projects.

Overall Conclusion

The proposed development was considered in light of the requirements of Section 177U and 177V of the Planning and Development Act 2000 as amended. Having carried out screening for Appropriate Assessment of the project, it was concluded that it may have a significant effect on one of the qualifying interest of the The River Barrow and Nore SAC – namely the otter. Consequently, an Appropriate Assessment was required of the implications of the project on the qualifying feature in question in light of its conservation objectives.

Following an Appropriate Assessment, it has been ascertained that the proposed development, individually or in combination with other plans or projects would / would not adversely affect the integrity of the River Barrow and Nore SAC, or any other European site, in view of the site's Conservation Objectives.'
This conclusion is based on a complete assessment of all aspects of the proposed project and there is no reasonable doubt as to the absence of adverse effects.
This conclusion is based on:

- The information on file, which is considered adequate to undertake a an appropriate assessment.
- A full and detailed assessment of all aspects of the proposed development and the nature and scale of the proposed development.
- A full and detailed assessment of all aspects of the proposed project including proposed mitigation measures and ecological monitoring in relation to the Conservation Objectives of the River Barrow and Nore SAC
- the separation of the proposed development from European sites and the nature and extent of intervening land uses.
- the lack of meaningful ecological connections to European sites with regard to the Source-Pathway-Receptor model.
- The sub optimal habitat for in the vicinity of the site for otter foraging or commuting.
- Detailed assessment of in combination effects with other plans and projects including historical projects, current proposals and future plans.
- No reasonable scientific doubt as to the absence of adverse effects on the integrity of River Barrow and Nore SAC
- Detailed assessment of in combination effects with other plans and projects including historical projects, current proposals and future plans.

3.0 Other issues

EIA Screening

In preparing this addendum report for the Board, I noted that in my 'Form 1 EIA Pre-Screening' I inadvertently indicated under Question 4 of the form that Schedule 7A information had been submitted with the application. I wish the Board to note that **Schedule 7A information has not been submitted with the application.**

4.0 Conclusion and Recommendation

On foot of my addendum report, my conclusion and recommendation remains the same, namely to grant planning permission for the proposed development.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Paul Caprani
Assistant Director of Planning

2nd of May 2024