



An
Bord
Pleanála

Inspector's Report

ABP-319800-24

Development	Construction of wind turbine with all associated site works. A Natura Impact Statement was submitted with the application.
Location	Kilcash, Co. Roscommon
Planning Authority	Roscommon County Council
Planning Authority Reg. Ref.	PD/23/60142
Applicant(s)	Natural Forces Renewable Energy Limited
Type of Application	Permission
Planning Authority Decision	Grant Permission
Type of Appeal	Third Party
Appellant(s)	Kilcash Wind Turbine Action Group Molly Naughton
Observer(s)	None
Date of Site Inspection	29 th November 2024

Inspector

Aoife McCarthy

1.0 Site Location and Description

- 1.1. The subject site has a stated area of 4.4 ha, and is located in the townland of Kilcash, Co. Roscommon. The site is located c.3.5km to the west of Knockcroghery village, 7km to the south of Roscommon town and 23km northwest of Athlone.
- 1.2. The proposed turbine will be located within an existing field which is currently accessed via a private access road from the L-7135 located (local road) to the south of the site. The site slopes from south to north towards the site of the proposed turbine. The site includes a former dwelling and shed, located within the site boundaries. The site primarily comprises agricultural grassland sub-divided by stone walls. The site is located within a localised upland area. Turbines are located within the wider view of the subject site.

2.0 Proposed Development

- 2.1. The proposed development consists of:
 - 1 no. 4.2MW wind turbine on an 81m tower with an overall tip height of 149.38m;
 - installation of a hardstanding area for the wind turbine;
 - a substation building (55m² Gross Floor Area (GFA)), up to 5m in height;
 - all associated ancillary infrastructure and preparatory works to new site entrance, site access track and underground cabling from site entrance to the Wind Energy Converter (WEC) hardstanding area;
 - the project will have a 30-year lifespan.
- 2.2. The application was accompanied by an Environmental and Planning Report (E&PR), dated August 2023. Section 3.1.3 of the E&PR sets out that the ESB grid connection does not form part of the application; and that it is the intention of the applicant to seek a Declaration under Section 5 of the Planning and Development Act 2000, (as amended) with respect to these works.
- 2.3. The indicative route, as illustrated in Figure 3.1 of this report, includes a 1.8km underground cable, which will travel from the substation building on site via a T-Connection into the overhead line which connects Skrine wind farm to the Roscommon 38kV substation.

- 2.4. The tower (81m in height) will be assembled from precast concrete segments and will be painted and coated with weather and corrosion protection. The tower sections will be stacked and bolted together on site. The rotor blades will be made from glass-fibre reinforced plastic, balsa wood and foam. The blade diameter is 138m. The nacelle houses the main technical parts to the turbine, including the generator, motor and the rotor blades are attached to it. The casing of the nacelle consists of glass fibre reinforced plastic. (Section 3.4 of the E&PR refers).
- 2.5. A request for Further Information was issued on the 22nd November 2023. A response to the application was received on the 2nd February 2024. Revised/significant further information public notices were received on the 13th March 2024. An earlier set of public notices was deemed to be inadequate by the planning authority.
- 2.6. The RFI as submitted included (i) clarification that the photomontages were submitted with the application in the first instance; and re-submitted at FI stage; (ii) clarification that VP19 in the LVIA is represented by VP2 throughout the assessment.

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. The Planning Authority issued a Notification of a Decision to Grant Permission on the 3rd May 2024, subject to 24 no. conditions.
- 3.1.2. Condition 2 requires that the permission is constructed within five years from the date of a final grant of permission.
- 3.1.3. Condition 3 states that the permission shall be for a period of 30 years from the date of the first commissioning of the wind energy development.
- 3.1.4. The conditions are otherwise standard in nature and typical for a development of this type.

3.2. Planning Authority Reports

3.2.1. Planning Reports

- 3.2.2. The report includes:
- a summary site and development description.

- Planning history on site (**P.A. Ref.: 21/221; ABP Ref.:PL20.312748**).
- Detailed outline of planning policy context.
- Summary of issues raised in the 77 no. submissions received.

3.2.3. The report concludes that, at a strategic level, the proposed development accords with relevant national, regional and local planning policy context.

3.2.4. The report confirms that an EIAR is not required for the proposed development. The Appropriate Assessment Screening Report (AASR) and Natura Impact Statement (NIS) were as per the previous application on this site, as noted above, and had not been informed by up-to-date information, including bird surveys.

3.2.5. The Report recommends that further information be sought relating to:

- (i) submission of photomontages to accompany the LVIA submitted with the application;
- (ii) (ii) the inclusion of an additional position to the LVIA;
- (iii) (iii) updates to the Ecological Impact Assessment (EclA) submitted with the application and submission of a revised NIS, as the NIS as submitted related to that as submitted with the previous application on site.

3.2.6. The Planning Authority subsequently issued a Stage 2: Appropriate Assessment (dated 3rd May 2024), concluding that the proposed development will not have a significant impact on the nearby Natura 2000 sites.

3.2.7. **Other Technical Reports**

Roads Section Planning Report: No objection, subject to the submission of, *inter alia*, a CMP, Traffic Management Plan (TMP), a programme for deliveries, the carrying out of precondition surveys of delivery routes. The report notes that cable routes (grid connection) have not been proposed as part of this application.

Athlone Municipal District: No objection to the proposed development. In the event that the planning authority decide to grant permission, Athlone (Municipal District) MD recommends the inclusion of conditions relating to the following: (i) the submission of a Traffic Management Plan (TMP), including a programme for

deliveries, for the written consent of Roscommon County Council, (ii) the submission of a pre-condition survey of roads along haul routes; (ii) delivery routes.

3.3. Prescribed Bodies

Department of Housing, Local Government and Heritage (28th November 2023 and 7th December 2023)

- 3.3.1. The initial correspondence from the Department of Housing, Local Government and Heritage (DHLGH) refers to correspondence from the Council dated 21st November 2023. The submission states that observations from the DAU with respect to archaeological heritage form part of the submission., however this is not the case.
- 3.3.2. The submission also states that having reviewed the archaeological assessment carried out on site, the DHLGH will have no objection to the development proceeding as planned.
- 3.3.3. The subsequent submission notes the following with respect to wildlife conservation:
 - The AASR and EclA are both dated March 2021, whilst the NIS is dated November 2021, and have not been updated with bird survey data from October 2020 to early 2023.
 - The EclA and NIS have not taken account of final collision risk data.
 - Bat surveys for wind energy developments should be undertaken from April to October (inclusive). Bat surveys should also have been undertaken in 2022.

Transport Infrastructure Ireland (TII) (01 Nov 2023 and 15 March 2024): No observation on the application.

RTE (11 October 2023): There is a risk of interference to broadcast services to viewers to the southwest of the proposed wind turbine and request the applicant implement measures to minimise interference, as appropriate.

3.4. Third Party Observations

- 3.4.1. From a review of the records on file, a total of 77 no. third party submissions. The issues raised can be collectively summarised as follows:

Biodiversity/Ecology/Landscape

- Inadequate assessment and conclusions within the EclA and AA.

- A full Environmental Impact Assessment Report (EIAR) should be undertaken, due to proximity of site to existing turbines; and works relating to the future ESB grid connection.
- The proposed development would materially contravene natural heritage policies of the Roscommon County Development Plan (CDP) 2022-2028.
- The AA has not adequately examined the hydrological connection between the site and Lough Ree SAC and SPA, with respect to karst limestone bedrock underlying this area.
- The proposed development has not been assessed under the EU Water Framework Directive (2000/60/EC).
- Groundworks could result in significant negative impact on landscape, having regard to limestone karst bedrock below this site.
- No assessment of the turbine foundation and potential effects on groundwater flow patterns and associated flood risk has been undertaken.
- Unacceptable impacts to flora and fauna during construction phase due to traffic impacts.
- The proposal is a threat to wintering /breeding bird species (including Whopper Swan, Golden Plover, Buzzard, Lapwing) which utilise European sites and environs. This includes through bird strike. This has not been assessed within the AA or EclA.
- Ornithological Summary Report and Collision Risk Model are inadequate.
- Survey data relating to Golden Plover and Whopper Swan are inaccurate.
- The natural habitat of bats will be negatively impacted due to the noise and presence of turning turbine blades.
- Insufficient bat survey information submitted with application.
- NMS Sites and Records database shows approximately 22 no. sites or monuments within 1km of the subject site.
- The site is within an area of extremely high historical and cultural value and will jeopardise potential for growth of tourism within the region.

- The proposal will have a significant negative impact on the historic demesne landscape and forest at Mote Park (a recreational facility). The proposal will also negatively affect Kilmaine ecclesiastical site.
- The proposal will be unduly obtrusive, dominate and detract from View 19 (a designated scenic view of Lough Ree), negatively impacting tourism potential of the county.
- The proposal introduces an 'industrial' component into the visual landscape, with negative effects on the skyline.
- The site is on an elevated rural plateau/open exposed landscape and would be overly dominant within the landscape, exacerbated by two existing turbines in the wider visual environment.

Traffic/Transport

- No information provided with respect to proposed haulage routes.
- Concerns with respect to capacity of road network to facilitate the delivery of the turbine.
- Impact of construction vehicles on roads and traffic in the area.
- The proposal will result in traffic congestion.
- The connection to grid has not been assessed.

Residential Amenity

- It will create noise, vibration and shadow flicker effects, with negative impacts to health and wellbeing of local residential community.
- The proposed turbine would result in unacceptable sub-audible threshold infrasound (IS) levels, detrimental to human health.
- The proposal does not meet required set back distances to residences.
- Proximity to property. The noise impacts from existing turbines (at Skrine wind farm) are significant and unacceptable.
- It will result in devaluation of property in the vicinity.

Other Issues

- The turbines are not recyclable.
- Inconsistencies in figures across drawings and reports.
- The proposal will negatively impact potential for local residents to obtain planning permission for rural dwellings, including within existing farms/agricultural landholdings.
- Concerns with respect to depopulation in the area.
- Lack of consultation with local community.
- The legitimacy of Knockcroghery Sustainable Energy Community is questioned.

3.4.2. A total of 12 no. submissions/observations were received on foot of the re-advertised public notices.

4.0 Planning History

4.1. Subject Site

- 4.1.1. **P.A. Ref.: 21/221; ABP Ref. PL20.312748** - Permission refused by Roscommon County Council and An Bord Pleanála for the construction of one 4.2MW wind turbine with an overall tip height of up to 150m.
- 4.1.2. The application was refused on the grounds that the Board was not satisfied that adequate information had been provided on the impact of the proposed development on the special conservation interest species for Lough Ree SPA (site code 004064), River Suck Callows SPA (site code 004097), Lough Croan Turlough SPA (site code 004139), and Four Roads Turlough SPA (site code 004140) have been selected.
- 4.1.3. The Board was therefore unable to ascertain, as required by Regulation 27(3) of the European Communities (Natural Habitats) Regulations, 1997, that the proposed development will not adversely affect the integrity of a European Site.

4.2. Environs of Site

- 4.2.1. **P.A. Ref. 04/103; ABP Ref. PL20.208733** - Skryne and Knockmeane Townlands, Athleague, Co. Roscommon: Permission granted in January 2005 for three wind turbine generators, one meteorological tower, one substation and substation

compound and associated site access roads. An extension of duration for the above permission was granted in February 2010 (**P.A. Ref. 10/3002**).

5.0 Policy Context

5.1. Climate Action Plan 2024

- 5.1.1. The Climate Action Plan 2024 provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting us on a path to reach net-zero emissions by no later than 2050.
- 5.1.2. Key objective in the plan is to increase the proportion of renewable electricity to up to 80% by 2030.

5.2. National Planning Framework (NPF) – Project Ireland 2040

- 5.2.1. The NPF identifies that the national energy policy focusses on three pillars; sustainability, security of supply and competitiveness. The NPF states that the Government recognises that Ireland must reduce greenhouse gas emissions from the energy sector by at least 80% by 2050, compared to 1990 levels, while at the same time ensuring security of supply of competitive energy sources to our citizens and businesses.
- 5.2.2. The Plan includes a series of shared goals, referred to as National Strategic Outcomes (NSO), NSO 8, Transition to a Low Carbon and Climate Resilient Society; achieving a low carbon, carbon resilient and environmentally sustainable economy by 2050. The NPF notes that new energy systems will be necessary for a more distributed, renewables-focused energy generation system.
- 5.2.3. Relevant provisions of the NPF include the following:
- 5.2.4. **National Policy Objective 55** seeks to promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

5.3. Northern & Western Regional Assembly Regional Spatial and Economic (RSES) Strategy 2020-2032

- 5.3.1. The RSES sets out the following with respect to renewable energy:

5.3.2. RPO 4.17: To position the region to avail of the emerging global market in renewable energy by:

- Stimulating the development and deployment of the most advantageous renewable energy systems.
- Supporting research and innovation.
- Encouraging skills development and transferability.
- Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses.
- Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.

5.3.3. RPO 4.18: Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.

5.3.4. RPO 4.19. Support the appropriate development of offshore wind energy production through the adequate provision of land-based infrastructure and services, in line with national policy and in a manner that is compatible with environmental, ecological and landscape considerations.

5.4. **Wind Energy Development Guidelines for Planning Authorities (2006)**

5.4.1. These guidelines provide advice on wind energy development on a range of considerations, including noise, shadow flicker, natural heritage, archaeology, architectural heritage, ground conditions, aircraft safety, visual and landscape impact and windtake. Chapter 6 provides guidance to planning authorities on decision-making in relation to the siting and design of wind energy developments in the landscape. This includes assessment with respect to siting, spatial extent and scale, cumulative effect, spacing, height and layout of turbines.

5.5. **Draft Revised Wind Energy Development Guidelines (2019)**

- 5.5.1. These guidelines provide an update and review of the 2006 guidelines and to date have not been finalised.

5.6. **Roscommon County Development Plan 2022-2028**

5.7. **County Development Plan – Climate Action, Energy & Environment**

- 5.7.1. The Plan includes the following relevant policy objectives:

CAEE 8.3: Support developments and actions that assist in achieving the national targets for energy from renewable energy, from renewable resources and reducing greenhouse gas emissions associated with energy production.

CAEE 8.4: Encourage and facilitate the various forms of renewable energy development detailed in the Renewable Energy Strategy that accompanies this Plan (as well as any other new forms of renewable energy which may be developed during the lifetime of this Plan), subject to satisfying the principles of proper planning and sustainable development.

CAEE 8.5: Facilitate wind energy developments primarily in areas designated in the Renewable Energy Strategy as “Most Favoured” and secondarily in areas designated as “Less Favoured” in the Renewable Energy Strategy, subject to normal planning criteria and having regard to the Wind Energy Guidelines (DECLG, 2006) and any update to the Guidelines that may issue during the lifetime of this Plan. This will include consideration of carbon benefit analysis, as appropriate.

CAEE 8.7: Ensure that proposals for renewable energy developments are considered in the context of relevant EU and national legislation, including in respect of environmental protection. No renewable energy developments will be considered in designated Natura 2000 sites or their surrounding buffer area.

CAEE 8.12: Facilitate renewable energy proposals that bring about a direct socioeconomic benefit to the local community.

5.8. **Development Plan – Natural Heritage**

- 5.8.1. The CDP includes the following relevant policy objectives:

NH 10.25 Minimise visual impacts on areas categorised within the County Roscommon Landscape Character Assessment including “moderate value”, “high value”, “very high value” and with special emphasis on areas classified as “exceptional value” and where deemed necessary, require the use of Visual Impact

Assessment where proposed development may have significant effect on such designated areas.

NH 10.26 Protect important views and prospects in the rural landscape and visual linkage between established landmarks, landscape features and views in urban areas.

- 5.8.2. The site is located within the Skryne Hill and Limestone Pavement Landscape Character Area. The Landscape Value is classified as High Value.

5.9. County Development Plan – Landscape Character Assessment

- 5.9.1. The noted purpose of this document is to provide a technical background for the Planning Authority to formulate the appropriate landscape policy objectives for the county.
- 5.9.2. The site is located within Landscape Character Area (LCA) 33 - Skrine Hill and Limestone Pavement. The key recommendation within this LCA is for applications for development to be accompanied by a visual impact statement, recognising the high value of open views across this landscape.

5.10. County Development Plan - Roscommon Renewable Energy

- 5.10.1. The Roscommon Renewable Energy Strategy (RES) is noted to support and underpin the core strategy and policy objectives of the Plan. The primary aim of the RES is 'to ensure that the county continues to address climate change through facilitating appropriately located renewable energy developments and through supporting energy efficiency in all sectors of the economy'.
- 5.10.2. Section 6.5 of the Plan notes states that,
- Having regard to the geographical location and the nature of the underlying geology of Roscommon, it is recognised that wind energy development currently offers the one of the most viable vehicles for renewable energy production in the county.
- 5.10.3. Following an intensive analysis process and consideration of the landscape of County Roscommon, areas within the county have been identified as being 'Most Favoured' 'Less Favoured' and 'Not Favoured'. Figure 7 of the RES indicates that the subject site is located within a 'Most Favoured', area, where wind farm development will be considered favourably, subject to compliance with all necessary siting and design standards.

5.11. Natural Heritage Designations

- 5.11.1. The closest European sites to the subject site are Lough Ree SAC (site code 000440) located c.4.4km to the northeast. This is a shared boundary with Lough Ree pNHA (site code 000440).

5.12. EIA Screening

- 5.12.1. The application is accompanied by an EIA Screening Report, dated August 2023 (Appendix 4 of the E&PR refers). The assessment concludes that the subject proposal does not have the potential to have significant effects on the environment and an EIAR is not required.
- 5.12.2. Further to a review of the full application documentation, having regard to the nature, size and location of the proposed development, and to the criteria set out in Schedule 7 of the Regulations, at preliminary examination stage, I also conclude that there is no real likelihood of significant effects on the environment arising from the proposed development. EIA, or EIA determination, therefore, is not required. (Please refer to Forms 1 and 2, Appendix 1 of this Report refer).

6.0 The Appeal

6.1. Grounds of Appeal

- 6.1.1. Two third party appeals have been made in respect of the decision of Roscommon County Council to grant permission for the proposed development on the 5th May 2024. The content of these appeals is summarised below.

1. Molly Naughton

- The appellant received planning permission to construct a house in October 2021 (P.A. Ref.: 21/349 refers). The proposed turbine is located within 550m of this permitted dwelling.
- Neither the Applicant nor local authority have taken this permission into consideration in assessing the subject application.
- There should be a minimum distance of 597.57m, from this turbine, based on the proposed turbine height, 149.39.38m.

- This property has not been included in the noise impact assessment forming part of the application.

1. Kilcash Wind Turbine Action Group

6.1.2. The submission, prepared the Kilcash Wind Turbine Action Group (KWTAG) Committee, is noted to be prepared on behalf of the wider Kilcash and Farbreagues community. The appeal includes the following technical reports:

- A Hydrology Report, prepared by Dr. Pamela Bartley, B. Eng., MSc., Ph.D, Consultant, Hydro-G;
- an Ecology Report, prepared by Dr. Christopher Bell PhD.

6.1.3. Grounds of appeal are as follows:

Hydrogeology

- Currently flooded Lough Funshinagh SAC, in the same Groundwater Body as the proposed development and within the published Groundwater Flow Path Length (GSI, 2003), presents risks to the project.
- A Risk Assessment with respect to impact on groundwater as a source of water supply, is required pursuant to European Union Drinking Water Regulations, 2023.
- The site is within close proximity to two significant Zones of Contribution for Public Water Supplies water supply (Mount Talbot PWS and Roscommon RWSS). The assessment should have taken account of Zones of Contribution data, which is noted to be outdated.
- No information has been presented with respect to public water supplies within the application.
- No evidence of consultation with Uisce Éireann.
- There is a direct hydrological pathway to Natura 2000 sites by virtue of proposal to excavate into limestone in the catchment of Lough Ree SPA.

- The application should have been accompanied by a hydrological assessment report, including an hydrogeological concept model for Lough Ree or Suck Callows, or designated turlough SACs.
- The site is within Funshinagh GWB as identified by the GSI, which has been subject to groundwater flooding, which is not addressed within the application.
- No evidence that consideration has been given to details presented by GSI in their Geo Heritage Reports for Suck Callows or Lough Funshinagh.
- Information related to Water Framework Directive is out of date.

Biodiversity

- The scope, methodology, and overall content of the EcIA is deficient.
- The field survey, mitigation measures and assessment of potential impacts includes conflicting information.
- The proposed mast, located between water dependent habitats presents an unacceptable risk.
- No consideration is given to potential impacts on birds and bats during the operational phase of the development.
- Additional walkover surveys should have been undertaken during summer months.
- Preliminary bat roost appraisal should have been undertaken of adjoining buildings. Surveys should have been undertaken of bat activity in the vicinity of the site.
- The EcIA should include a breeding bird survey.
- The reporting of wintering bird survey is limited in detail.
- The ZOI within the AASR, utilising a 15km radius, has omitted a series of relevant European sites.
- The AA has not addressed potential transmission of pollutants or sediment by underground watercourses in this limestone landscape.

- The NIS is as prepared for the previous application, dated March 2021, with minimal description of methodologies.
- Queries with respect to timing, scope and detail of plant surveys forming part of AA and EclA.
- The application should have been accompanied by a Flood Risk Assessment. The subject site and environs are at high risk of flooding, having regard to proximity of the site to Lake Funshinagh (6km).

Other Issues

- The application should have been accompanied by a Flood Risk Assessment.
- The subject site and environs are considered to be at high risk of flooding, having regard to proximity to Lake Funshinagh.
- The photomontages are selective.
- The assessment does not include viewpoints from existing dwellings including those in Farbreagues, noted as the closest cluster of houses to the proposed turbine.
- The noise impact from the proposed development exceeds WHO guidelines.
- The proposed turbine will undermine tourism potential of Kilcash and immediate surrounding area.
- No assessment has been undertaken to ascertain potential risks or propose mitigation measures with respect to potential rock blasting in karst limestone areas.
- Inconsistencies throughout the report.
- The findings of the previous decision by An Bord Pleanála have not been addressed.

6.2. Applicant Response

6.2.1. A response to the third-party appeals was received on behalf of the Applicant, on 27th June 2024. Notably, the response includes Collision Risk Model Raw Data (Appendix 2 of the appeal response refers).

6.2.2. A summary of these responses is set out below:

- The Hydrogeology Plan forming part of the application was undertaken by a competent consultant.
- The collection of additional hydrological data has not been completed as this did not arise as an issue in the previous decision on the site (ABP Ref.: PL20.312748 refers).
- The site is not within a Public Supply Source Protection Area, noting the distance from the site to nearest SPAs. The site is not within any Group Scheme Preliminary Source Protection Area, or within the radius of GSI database records for wells or springs.
- The application does not include proposals to extract or discharge water, with the exception of the discharge of surface waters to serve the proposed development. This water will pass via an interceptor and settlement pond prior to discharge back to ground.
- Accidental spillages of oils or fuels on site are heavily mitigated against, as outlined within the framework Construction Environmental Management Plan (CEMP).
- The requirements under the European Union Drinking Water Regulations, 2001 are therefore not applicable.
- The proposal to excavate into limestone in the catchment of Lough Ree SAC and SPA does not constitute a direct hydrological pathway. A source pathway receptor (SPR) needs to be present in order to present a risk. The applicant has proposed multiple mitigation measures to ensure a complete SPR linkage does not exist, thereby removing risks associated with the project.
- With respect to Water Framework Reporting, water quality data is only available on the EPA data viewer to 2016-2021 for the Knockcroghery River.
- EclA and bird surveys undertaken by specialists, noting relevant experience.

- The risk collision model was undertaken by an independent third party consultant (MKO).
- The Ornithological Summary Report accounts for all survey methods used during bird surveys and are aligned to industry standards.
- The First Party refutes the commentary that the site is 'a stepping stone pathway' between several Natura 2000 Sites, referring to section 6 of the applicant's NIS comprising mitigation measures during the construction phase, ensuring there is no negative impact in surrounding ponds and Mote Park wood.
- The figures within the Collision Risk Assessment are valid.
- Bat surveys were undertaken in accordance with best practice, under the Wildlife Act 1976. The first party welcomes the requirement to complete additional bat surveys as specified within the conditions of permission.
- Bat Survey Guidelines (2008) is a guidance document only.
- Findings of the Stage 1 Flood Risk Assessment remain valid, rated as Low Risk.
- There is no requirement or rationale to include ancillary works within the photomontages.
- The turbine meets the min requirement of 500m to a dwelling.
- The proposed development integrates with existing turbines within the wider landscape.
- Habitats were classified following the Heritage Council Classification system (Fossit 2000).
- Noise Assessment carried out in accordance with relevant EIA Directive, EPA and Wind Energy guidelines and best practice.
- Noise and vibration from the proposed development is not expected to cause any significant effects at any stage.
- In the event that rock blasting is required, potential impacts with respect to karst landscape will be assessed in the first instance.

6.3. Planning Authority Response

- None received.

6.4. Observations

- None received.

6.5. Further Responses – Molly Naughton to First Party Appeal

- 6.5.1. The submission reiterates the grounds of appeal relating to noise. The appellant refers to a High Court decision relating to a two-turbine wind farm (Ballyduff wind farm, Kilcomb, nr. Enniscorthy, Co. Wexford); where Justice Emily Egan found that noise levels generated at certain times of the day were considered to constitute a nuisance to the occupants of neighbouring properties.

7.0 Assessment

- 7.1. Having examined the application details and all other documentation on file, including the report of the local authority, having inspected the site and having regard to the relevant local and national policies and guidance, I consider the main issues in this appeal relates are as follows:

- Hydrology and Hydrogeology
- Flood Risk
- Archaeology
- Residential Amenity
- Landscape and Visual Impact
- Appropriate Assessment
- Biodiversity

7.2. Hydrology and Hydrogeology

- 7.2.1. The application is accompanied by an Environmental & Planning Report (E&PR), section 13 of which relates to hydrology and hydrogeology, prepared by Rowan Consulting Engineers.

- 7.2.2. The report notes that the site is located within an area with a regionally important aquifer of extreme vulnerability, with karst features within 250m of the site. The report sets out that a detailed report on hydrology and hydrogeology of the site and surrounding area, has not been provided, due to the karst characteristics of the subject site and environs. The report notes that in the event of a release to ground, desk top studies would be unable to predict the distance or the depth which contaminants may travel due to the nature of the karst features. It is set out that preferential flow paths in the form of dissolved bedrock, may exist throughout the formation, which would not be consistent and unpredictable. The report therefore recommends that the most reliable way to ensure there is no risk to groundwater is to remove the risk of a release occurring in the first instance.
- 7.2.3. The report sets out that the contours of the site have been considered when positioning the turbine with respect to potential surface water run-off. The closest karst features (depressions) are located approximately 60m to the northwest and 90m to northeast from the proposed turbine. The depression to the northwest is upgradient and that to the east is at gradient with the site of the turbine.
- 7.2.4. The report notes that surface water run-off is anticipated to be minimal as the introduction of hardstand is limited to the turbine foundation and the extension of an existing access route (c.450m in length). The report notes that the proposed turbine foundation is primarily proposed above ground with minimal foundation required for the turbine base.
- 7.2.5. The proposed turbine is a direct drive generator, a gearless system, therefore without the need for lubrication or risk of oil leaks from gear boxes. This means that there is low risk of polluting discharge during operational phase.
- 7.2.6. The application is accompanied by a Framework Construction Environmental Management Plan (CEMP) which includes a series of relevant mitigation measures. These include:
- designated refuelling station for construction equipment to prevent accidental spillage of fuel oil/diesel;
 - storage of fuel or any other chemicals onsite will be in mobile bunded units;
 - removal of welfare and kitchen facilities from compound area;

- at the end of construction phase;
- silt fencing around any stockpiled topsoil, and
- concrete pouring in dry weather only.

7.2.7. In this context, the third-party appellant (KWTAG), considers a series of inter-related grounds of appeal;

- The application should have been assessed against the European Drinking Water Regulations 2023;
- the site is within proximity to two significant Zones of Contribution (ZoC) for Public Water Supplies (Mount Talbot PWS and Roscommon Ballinagard Roscommon Water Supply Scheme (RWSS);
- that due consideration has not been given to potential ground water flooding at Funshinagh Ground Water Body (GWB), to the south and Suck Callows SPA to the west, as set within Geo Heritage Reports as prepared by the Geological Survey of Ireland (GSI).

7.2.8. In this context, as set out within the response to the third party appeal, GSI data confirms that the site is not within a Public Water Supply Source Protection Area, the closest Source Protection Areas (SPA) being located c.1km to the west and 3km to the northwest.

7.2.9. As set out by the applicant, Public Supply Source Protection Area dataset includes SPAs, located around groundwater abstraction points that are managed by Uisce Éireann. The ZoC is defined as the land area that contributes water to the well or spring, as confirmed by GSI.

7.2.10. The response sets out that the site is not within any Group Preliminary Source Protection Areas, or within the radius of GSI database record of wells and springs. The first party further reiterates that the proposed development does not include proposals to extract or discharge water, with the exception of ground water which shall pass through an interceptor and settlement pond prior to discharge back to ground. The first party considers that the mitigation measures, as outlined within the CEMP, and as referenced above will protect the site and environs during the construction phase.

- 7.2.11. From a review of European Drinking Water Regulations 2023, these guidelines relate to, inter alia, assessment and management of catchment areas relating to abstraction point of water which will form part of public water supply. In response to this item, the first party again notes that the site is not within a SPA relating to any PWSS, or Group Preliminary Source Protection, or within the radius of GIS database records for wells and springs. As above, the proposed development does not relate to abstraction or discharge of water with the exception of the surface water to serve the proposed development.
- 7.2.12. With respect to potential ground water flooding at Funshinagh GWB, the applicant refers again to the above rationale, that the site is not within a SPA relating to any PWS or Group Preliminary Protection Area or within the radius of GSI database record of wells and springs; and that the proposed development does not include water for water abstraction or discharge.
- 7.2.13. In this context, I am satisfied that the hydrological and hydrogeological assessment submitted with the application is sufficient and appropriate, having regard to the limestone formation.
- 7.2.14. From a review of the documentation, I concur with the applicant that the site is not located within a SPA relating to any PWSS, Group Preliminary Source Protection or within the radius of GIS database records for wells and springs. As set out above, the proposed development does not include proposals for water abstraction or discharge, with the exception of surface water discharge relating to the site.
- 7.2.15. In this context I note that the separation distance to the nearest karst features (60m and 90m respectively) is sufficient, and that the closest features are either upgradient or at gradient to the site of the turbine. I also note the limited extent of foundation and soil extraction works, and in my view, robust mitigation measures as set out within the Framework CEMP.
- 7.2.16. In this regard, in the event that the Board are minded to grant permission, I recommend that a condition should be included expressly requiring that the mitigation measures as set out within the Framework CEMP are implemented.
- 7.2.17. In this context, I note that hydrology/hydrogeology did not form part of the reason for refusal with respect to the previous application on the subject site (ABP Ref.:PL20.312748 refers).

7.3. Flood Risk

- 7.3.1. The application is accompanied by a statement relating to flood risk (section 13.1 of the above referenced E&PR refers). The Framework CEMP as submitted, also includes mitigation measures with respect to flood risk during construction and operational phases of the proposed development.
- 7.3.2. In response to commentary from KWTAG, the first party sets out that this assessment has been undertaken in accordance with Planning System & Flood Risk Management Guidelines for Planning Authorities (Dept of Environment, Housing and Local Government) Flood Risk Assessment, noting that Stage 1 normally relates to a review of available flood mapping.
- 7.3.3. In this context, the assessment sets out that the site is not within any mapped flood zone and therefore a risk has not been identified, and as a result, the next (sequential) risk assessment is not required.
- 7.3.4. The E&PR notes that an assessment of Catchment Flood Risk Assessment and Management (CFRAM) mapping, as prepared by the Office of Public Works (OPW) was undertaken at preliminary stage of the assessment process. The historical records confirm that there have been 3 no. flood events within 3.5km of the subject site. The closest of these is located within 900m of the subject site. OPW CFRAM mapping also confirms that the site is not within an area at risk of fluvial, pluvial or tidal flooding.
- 7.3.5. The report notes that a Strategic Flood Risk Assessment (SSFRA) was completed for the county, as part of the 2021-2027 Roscommon County Development Plan. A review of the relevant maps confirms that the site is not within flood zones, as set out in 'Roscommon County Council Flood Data and Soils' map, or within the map relating to the village of Knockcroghery.
- 7.3.6. The report notes that the nearest mapped groundwater flooding is located approximately 3.5km to the west.
- 7.3.7. Having reviewed the file, and undertaken a site visit, I am satisfied that the flood risk assessment is consistent with the above referenced guidelines and that the Low Risk score is reasonable, for this development type at this location. As noted above, the

Framework CEMP includes a range of measures to protect the site in the event of flood during the construction stage.

- 7.3.8. In my view the proposed development is therefore acceptable with respect to flood risk, subject to the implementation of mitigation measures within the Framework CEMP. In this context, should the Board be minded to grant permission for the proposed, I recommend the inclusion of a condition requiring the implementation of all mitigation measures within the Framework CEMP.
- 7.3.9. As an additional matter, the appellant (KTWAG) considers that the site and environs, and in particular the adjoining public road, to have experienced frequent flood events. The first party suggests that this may be caused by blockage of drains within the adjoining public road network.
- 7.3.10. Having reviewed the site and file in this context, having regard to the scale, nature of the proposed development, I am satisfied that flood risk within the adjoining public road arising from the proposed development can be satisfactorily addressed by way of condition. Should the Board be minded to grant permission for the proposed development, I recommend the inclusion of a condition, requiring, inter alia, that existing road drainage shall not be impaired by the proposed development, as included by the local authority.

7.4. Archaeology

- 7.4.1. An Archaeological Assessment Report, dated April 2021 and an Archaeological Test Excavation Report, dated September 2021 prepared by Icon Archaeology was submitted as Appendix 9 of the E&PR. These both relate to the previous application on the subject site (P.A. Ref.: PD 21/221; ABP Ref.:PL20.312748), albeit noting the nature of the application is consistent with the subject application.
- 7.4.2. As noted within this assessment report, there are eight records of monuments and places (RMP) sites within 800m of the subject site. The above referenced archaeological test excavation report confirms that four test excavations were carried out at the site in August 2021 and no features or finds were found. An archaeological mitigation measure was recommended, and this was included as Condition 15 of the Notification of the Decision to Grant as issued by Roscommon County Council, dated 3rd May 2024.

- 7.4.3. In this context, I consider that the mitigation measures proposed would ensure that there would be no significant impact on cultural heritage sites. In the event the Board decide to grant permission, I recommend that a condition is attached, reflecting that as outlined by the local authority.

7.5. Residential Amenity

- 7.5.1. The third party appeals and submissions on the application include reference to a wide range of issues, the most relevant of which are addressed separately in this section.

Noise and Vibration

- 7.5.2. The application is accompanied by a 'Wind Turbine Noise Impact Assessment' dated 10th July 2023, prepared by Enfonc Ltd. (Appendix 8 of the E&PR refers).
- 7.5.3. In this instance, baseline noise levels have not been established by way of on site survey; but through an assumption that background noise levels would exceed 30dB at all wind speeds.
- 7.5.4. The assessment has identified 16 no. noise sensitive locations (NSL) within 1km radius catchment of the site, with 83 no. within a 2.5km radius catchment.
- 7.5.5. A series of computer-based prediction models have been prepared to quantify the cumulative noise levels associated with the operational phase of the proposed development together with Skrine wind farm, located c.2.2km to the west of the site.
- 7.5.6. The highest anticipated isolated and cumulative noise levels are both predicted at NSL No. 60 (to the southeast of the proposed turbine) of 33.1dBA and 33.3dBA at a windspeed of 13 metres/second, respectively.
- 7.5.7. The report concludes that the proposed Kilcash wind turbine and the existing Skrine wind farm are expected to operate below the noise criteria for each period i.e. daytime (45dBA) and night-time (43dBA), at all wind speeds.
- 7.5.8. Having regard to the assessment submitted with the application, I am satisfied that the proposed development will be acceptable with respect to noise impacts to the closest residential properties. This includes with respect to extant permission (PA Reg. Ref. 21/349) for a dwelling as referenced by third party appellant, Molly Naughton, located within 550m of the proposed turbine.

- 7.5.9. In this context, I do not consider it necessary to require the submission of a noise compliance monitoring programme to the planning authority, as recommended by the Council.
- 7.5.10. With respect to vibration effects, rock breaking and piling operations are the most significant of potential sources during the construction phase. The assessment sets out, at distances in excess of 100m from the proposed works, it is anticipated that vibration effects will be attenuated through the ground to imperceptible levels. The Framework CEMP includes detailed range of mitigation measures including with respect to noise and vibration during the construction phase.
- 7.5.11. The report notes that vibration generated from the proposed development will decrease rapidly with distance through the ground. Typically, at a distance of 100m from a 1MW turbine unit, vibration effects (at 10^5 mm/s) would be imperceptible. The report also notes that at distances of less than 300m, vibration levels would typically no longer be perceptible from standard background noise. As the shortest distance from external amenity of the closest SR is greater than 650m, the assessment notes that the level of vibration will be significantly below the threshold for perceptibility. Vibration thresholds are therefore not required during the operational phase.
- 7.5.12. There is therefore no significant vibration effects expected at any NSLs during construction and operational phases of the proposed development. I am therefore satisfied that the proposed development is acceptable with respect to vibration effects. The Framework CEMP includes mitigation measures including with respect to vibration effects during the construction phase.

Shadow Flicker

- 7.5.13. The application is accompanied by a Shadow Flicker Assessment, dated June 2023, prepared by Natural Forces Ireland. (Appendix 10 of the E&PR refers).
- 7.5.14. This preliminary report summarises shadow calculation for an ENERCON E-138 converter. The calculated times are worst case, that is the sun is shining all day and the WTG is always operating.
- 7.5.15. Section 5.12 (Shadow Flicker) of the Wind Energy Development Guidelines (2006) recommends that 'that shadow flicker at neighbouring offices and dwellings within 500m should not exceed 30 hours per year or 30 minutes per day'.

- 7.5.16. The report concluded that daily/yearly shadow flicker limits would be exceeded at 2 no. shadow flicker receptors. The report also identifies that shadow flicker may be experienced at 9 no. receptive locations. However, these receptors are located at a distance greater than 500m from the proposed turbine, and the expected level of shadow flicker will not therefore exceed the WEG.
- 7.5.17. The E&PR sets out the intention to install a shadow shut off system in the proposed wind turbine notwithstanding that the receptors are located outside the 500m limit. In this context, the Wind Energy Guidelines note that where shadow flicker may be a problem, to take appropriate measures to prevent or improve the potential effect such as by turning a turbine off at certain times.
- 7.5.18. In this context, it is recommended, that a shadow shut off system be installed, by condition in the event of a grant of permission.
- 7.5.19. I note that the subject assessment does not include in-combination effects of the proposed turbine with existing turbines with respect to shadow flicker.

Proximity to Dwellings

- 7.5.20. The E&PR submitted with the application identifies the closest existing dwelling to be located within c.616m of the subject site
- 7.5.21. The Wind Energy Guidelines (2006) advise that noise impacts are unlikely to occur at dwellings/noise sensitive locations located over 500m. The guidelines also include recommendations relating to shadow flicker effects relating to dwellings and offices within 500m of the site.
- 7.5.22. In this context, SPPR2 of the Draft Revised Wind Energy Development Guidelines 2019 refers to a mandatory minimum distance of 500m or 4 times the tip height of the proposed turbine (600m), from the nearest property, for visual amenity purposes.
- 7.5.23. In this context, it is noted that the proposed development will not result in significant injurious concerns with respect to noise, shadow flicker as detailed above. In this context, in my view, the proposed turbine is sufficiently set back from existing houses in the vicinity of the subject site. This includes with respect to property the dwelling in the ownership of Molly Naughton, located within 550m of the subject site.

Roads and Traffic

- 7.5.24. The application is accompanied by a Preliminary Traffic Management Plan (PTMP), dated June 2023, prepared by Marble Consulting Engineers Limited (Appendix 10 of the E&PR refers).
- 7.5.25. The proposed development will be accessed from the L-7135, a local county road, on the southern boundary of the site. The site will be served from this access point during the construction, operational and decommissioning phases. I note that this access road and wider road network include narrow rural roads, with drystone walls, trees and hedgerows.
- 7.5.26. The PTMP notes that the estimated workforce will be between 15 and 25 persons during the construction phase. The PTMP includes estimated traffic volumes with an average of 10-12 vehicular movements for deliveries to the site. This will peak to 75 no. concrete truck deliveries, during the construction of the turbine base, with the base being poured in a single day. The proposal includes a total of 15 no. car parking spaces within the construction compound during the construction phase (12 months). From a review of the drawings these are considered to be a sufficient quantum and location to serve the construction phase. The report includes details of haul routes for construction materials and components of the turbine. In this context, the PTMP concludes that the structural integrity of the national and regional road network is adequate to cater for these anticipated loads.
- 7.5.27. With respect to operational phase, the E&PR notes that the project will require on-site maintenance twice a year, with the proposed turbine otherwise monitored remotely on a day-to-day basis. The PTMP, also allows for a once per year unplanned visit for maintenance purposes. As noted in the report it is considered that the operational phase will therefore have a minimal effect on existing road network.
- 7.5.28. With respect to traffic and transportation, I am therefore satisfied that the proposed development will not result in significant adverse impacts on the local road network and traffic; and would be typical for this type of development.

Health

- 7.5.29. The issue of impact on health was raised in a number of submissions received by the planning authority and within the subsequent third party appeal as received from KWTAG. As noted in the previous application and by the planning authority, general health is not referenced in the Wind Energy Development Guidelines (2006) and the

2019 draft guidelines generally refer to health in the context of noise. Given the conclusion of the noise section, above, I do not consider this would have a significant undue adverse impact on the general area. I also note the mitigation measure that can be applied to shadow flicker.

- 7.5.30. I am therefore satisfied that the proposed development would not result in significant adverse effects with respect to health and recommend the inclusion of a condition to address any potential shadow flicker.

Devaluation of Property

- 7.5.31. This matter has been the subject of concern within the third-party submissions to the application and third party appeal from the KWTAG.
- 7.5.32. In this context, it is noted that under the Development Plan 2022-2028 the site is located within a 'Most Favoured Area', for wind energy development potential. There is in addition, a depth of policy support for renewable energy projects within rural areas, such as the subject site at local, regional and national planning policy level.
- 7.5.33. I also note that Skrine wind farm has been permitted within the environs of the site.
- 7.5.34. In this context, it is noted that the Inspector's Report with respect to the previous application for a wind turbine at the subject site, came to the same conclusion in with respect to this issue. The Decision and Order of the Board is also noted not to have agreed with the Inspector's conclusion on this matter.
- 7.5.35. In conclusion therefore, in my view, that devaluation of property does not constitute grounds for refusal in this instance.

Conclusion

- 7.5.36. Having regard to the above, and potential impact with respect to noise, shadow flicker, health, proximity to houses, devaluation of property, and roads and traffic, I am satisfied that the proposed development, subject to implementation of mitigation measures, would not have a significant adverse impact on the residential amenity of the wider environs of the site.

7.6. Landscape and Visual Assessment

- 7.6.1. The application is accompanied by a Landscape and Visual Assessment (LVIA), dated July 2023, prepared by Macro Works Ltd. (Appendix 6 of the E&PR refers).

This includes a booklet of photomontages, dated July 2021, also prepared by Macro Works Ltd. An updated Landscape and Visual Impact Assessment (LVIA) was submitted as part of the response to Further Information, dated January 2024.

- 7.6.2. The assessment is based on the Roscommon County Development Plan 2022-2028. As noted within the LVIA the site is located within Landscape Character Area (LCA) 33, 'Skrine Hill and Limestone Pavement'. This is noted to be of High Value, noting that the CDP includes four classes of landscape value; moderate, high, very high and exceptional value.
- 7.6.3. The character type of LCA 33 is defined as the 'Hills and upland type'.
- 7.6.4. Scenic View 19 as listed in the LCA of the Roscommon CDP 21022-2028, is noted to be located within 1km to the south-west of the subject site, noted to include elevated views of the surrounding stonewall landscape and Lough Ree in distance.
- 7.6.5. With respect to landscape sensitivity, the LVIA considers the central and wider study area to be of a Medium landscape sensitivity. The assessment notes that the greatest potential for landscape impacts relates to change(s) in character of the immediate area, further to the introduction of, inter alia, tall structures, such as wind turbines. In this instance, the receiving landscape is noted to include two turbines, located 2.2km southwest of the site. In this context, the proposed turbine is considered to be consistent and compatible with this pre-existing use.
- 7.6.6. In addition, this relates to the introduction of a single structure, and therefore not to a significant extent of land, or material changes to rural land use within the study area.
- 7.6.7. In this context, the LVIA sets out that medium impacts include changes which are modest in extent and scale that may lead to noticeable changes in landscape character and quality. Low impacts relate to changes leading to discernible changes in landscape character and quality. Negligible impacts include the introduction of features characteristic of the existing landscape.
- 7.6.8. In this context, it is considered that the magnitude of impact will be Medium-low within the immediate vicinity, reducing to Low and Negligible as the proposed development reduces to constitute, in effect, a smaller background component within the wider landscape fabric. In this context, I consider that the impact within the immediate vicinity to be greater than Medium-low, having regard to the scale of the

proposal, albeit the existing turbines within the wider visual context. I agree that the assessment that the impact in the wider landscape context will be Low and Negligible.

- 7.6.9. In this context, taking account of the Medium landscape sensitivity attributed to the study area, the Medium-low magnitude of impact, the assessment concludes that this will result in an overall significance of no greater than Moderate-slight within 1km of the proposed development, with the remainder of the study area predicted to experience Slight or Imperceptible landscape impacts.
- 7.6.10. It is noted that Table 1-3 of the LVIA sets out the range of impacts relating to sensitivity receptor with High rating. In my opinion, having regard to the level of change within the immediate site environs, notwithstanding the pre-existence of two turbines within the wider landscape, that the short-term impact may be more appropriately defined as Moderate -slight. I concur that the level of impact would reduce to Slight or Imperceptible in the wider environment.
- 7.6.11. The LVIA includes eight verified reference points (VRPs) to assess the visual impact within the study area, noting Viewpoint 2 relates to Scenic View 19 of the Roscommon CDP.
- 7.6.12. As noted, in the assessment of the previous application, I concur that the inclusion of a viewpoint from the local road in Farbreagues, approximately 650m to the northwest of the site would have been beneficial in this assessment. Notwithstanding, I consider the selected viewpoints provides sufficient material to assess the potential visual impacts of the proposed development.
- 7.6.13. The LVIA includes a detailed assessment of each viewpoint. Quality and Duration of impact for all images is noted to be Negative and Long-Term. The significance of impact varies from Moderate (VP1 and VP2), Moderate-slight (VP3 and VP4), Slight (VP5 and VP6) and Imperceptible (VP7 and VP8). Having reviewed the site, including site visit, I concur with the respective assessments for each viewpoint.
- 7.6.14. The cumulative impact with the two existing turbines is predicted to be low.
- 7.6.15. Overall, I concur with the conclusion within the LVIA that the proposed single turbine will not give rise to any significant landscape and visual impacts.

- 7.6.16. With respect to Scenic View 2 of the Development Plan, as expressed by the Inspector with respect to the previous application on site, I note that there is no stopping or set down area, but is taken from a narrow, relatively steep local road. In my view, the predicted level of impact (i.e., moderate, negative and long-term) is accurate; and in the context of, the location of the site within a Most-favoured area for potential wind energy projects within the Development Plan, pre-existing turbines within the baseline visual environment, and the temporary duration (albeit 30 years) of the project, to be fully justified in this instance.
- 7.6.17. As noted above, the RES has been informed by the recommendations within the LCA, regarding wind energy developments and the potential for significant effects on the landscape of the county. As discussed above, the site is located within a Most-favoured area, where wind farm development will be considered favourably, subject to compliance with all siting and design standards.
- 7.6.18. The site is also within LCA 33. Again, the key recommendation of which is for an application to be accompanied by an LVIA, which is the case in this instance.
- 7.6.19. Moreover, as noted above, the LVIA concludes that the proposed development is not considered to give rise to any significant landscape and visual impacts. I concur with this assessment.
- 7.6.20. I therefore consider that the proposed development would be acceptable with respect to the landscape and visual amenities of the site and wider environs.

7.7. Biodiversity

- 7.7.1. The application was accompanied by an Ecological Impact Assessment (EclA). The document as initially submitted was subsequently updated in response to a request for Further Information, January 2024. The revised EclA is informed by, inter alia, site and bat and surveys. Bird surveys were undertaken over the period 2020 to 2023, with the objective to identify any flight paths across the site by target species. Wintering bird surveys were undertaken over winter 2020-2021, and between October 2021 and March 2023.
- 7.7.2. As set out above, I note the third party considers the EclA to be inaccurate, and not to best practice standards. From a review, I consider that this report to be consistent with best practice and containing sufficient information to allow an assessment of the

potential ecological impacts of the proposed development on the site and environs. With respect to the Ornithological Summary Report, dated June 2023, I concur with the first party, that the document includes clear description of the methodologies used. I also consider the Collision Risk Model report (June 2023), to be clear and sufficiently detailed. As noted above, the first party response includes records of data used in the preparation of collision risk model, albeit noting that this does not affect my assessment of this report.

- 7.7.3. The document notes that the site is not located within a designated conservation area, the closest European site located c.4.4km to the northeast. All other sites are located at a distance greater than 5km from the subject site.
- 7.7.4. The report notes that there are no drainage ditches or watercourse in the vicinity of the site and there is therefore no risk of siltation or pollution affecting any downstream receptors. There are a number of shallow depressions in the vicinity of the site that hold water, however, construction activities are considered to constitute no greater risk to water quality within these features than that associated with general agricultural activities regularly undertaken at the site. The third party consider these areas to offer potential hunting ground for bats. As reconfirmed by the third party, no foraging potential will therefore be impacted.
- 7.7.5. The EclA notes there are no records, evidence or suitability for any rare, threatened or legally protected plant species within the development site. The open grassland habitat at the site supports a limited range associated fauna, with the exception of the Irish hare. The assessment notes that the proposed development will not affect the ongoing utilisation of the area by this species other than during the construction phase. The short duration (3-6 months) and localised nature of the development would render this potential impact as negligible as there is ample alternative habitat in the general vicinity for hare.
- 7.7.6. The report sets out that the proposed turbine will be situated in a site that offers low habitat suitability for bats due to its exposed location and poor connectivity with the surrounding landscape. The proposed turbine is not considered likely to have any medium- or long-term impacts on the local bat population. The first party response reconfirms that there is no potential for bat roosting within the agricultural buildings adjacent to the subject site. The response from the First Party states that there is no

evidence that Leisler's Bat habitat will be affected as a result of the proposed development, noting the bat species to be recorded of Least Concern.

- 7.7.7. In this context, I am satisfied that there is no requirement to undertake additional surveys of the site and environs, including the above referenced agricultural buildings with respect to the potential for bat roosting.
- 7.7.8. The report sets out that the site provides suitable breeding habitat for the red listed (on the Birds of Ireland Conservation Concern in Ireland (BoCCI), Meadow Pipit. In this context, the first party reiterate that, according to SNH guidelines, 2017, it is generally considered that wind farms do not significantly impact passerine species. The closely grazed grassland would also not be suitable for ground nesting birds.
- 7.7.9. From studies conducted into the dispersal of the species during the construction phases of projects, Meadow Pipits are shown to be only temporarily displaced, therefore, no detrimental effects will be caused by the proposed development on this species.
- 7.7.10. The EclA notes that for bird species recorded from the site during winter period, no regular commuting or migratory routes through the study area were detected.
- 7.7.11. Golden Plover are noted to have a moderate association with the site, using it occasionally during the winter, though do not appear to be dependent on the site and use it, with other areas for foraging. Collision risk during operation is estimated at 0.6 Golden Plover per year, or 19 birds over the lifetime of the turbine. Additional mortality caused by collisions relative to background mortality was assessed to evaluate the population consequences for Golden Plover; noting that losses at the site would increase the annual mortality by 0.1%, a ,1% increase in background mortality constituting a negligible effect on the county population. The localised nature of the single turbine is therefore unlikely to lead to a total displacement from the site and the potential impact on Golden Plover is rated as minor adverse.
- 7.7.12. The report notes that small flocks of Lapwing were recorded on eight occasions, flying around the study area. Whooper Swan was also recorded flying through the study area on a single occasion. The predicted collision risk is negligible for these species.

7.7.13. Overall, the EclA considers that the site is rated of local importance (high) ecological value on account of its associated breeding and wintering bird fauna, which includes a number of Red listed and Amber BoCCI listed species. I concur with this evaluation. In my view, having regard to the separation distances from protected sites, the low habitat value of the subject site, subject to implementation of mitigation measures, the proposed development will be acceptable with respect to ecological impacts on the subject site and environs.

7.8. Issue of Appropriate Assessment

7.8.1. As noted above, the previous application on the subject site (**P.A. Ref.: 21/221; ABP Ref. PL20.312748**) was refused on grounds relating to appropriate assessment.

7.8.2. Specifically, the Board was not satisfied that adequate information had been provided on the impact of the proposed development on the SCI species for Lough Ree SPA, River Suck Callow SPA, Lough Croan SPA and Four Roads Turlough SPA.

7.8.3. The Board was therefore unable to determine, as required by Regulations 27(3) of the European Communities (Natural Habitats) Regulations 1997, that the proposed development will not adversely affect the integrity of a European site.

7.8.4. In this context, as detailed with respect to AA below, in my view, this application does contain sufficient information to complete an AASR and NIS with respect to the proposed development. Notably, the application includes;

- Winter bird surveys for winter seasons 2020-2021, 2021-2022, 2022-2023.
- Bird surveys for the period from 2020 -2023.
- An Ornithological Surveys 2022-2023 Summary Report.
- A collision risk assessment, covering a 29 month period (dated March 2023).

7.8.5. In this context, in my opinion, the reason for refusal of the previous application has been addressed within the subject application.

7.8.6. In this context, AA is addressed in Section 8 of this report, which concludes as follows;

In view of the limited extent of habitat loss associated with the single turbine and availability of similar habitat within the surrounding landscape, the proposed

development is not considered at risk of giving rise to any significant effect on the wintering population of either species or effecting their conservation objectives within any European site.

Considering all of the above, I am satisfied, beyond all reasonable scientific doubt, that there will be no adverse effects on the integrity of any European site, as a result of the proposed development, either individually or in combination with other plans and projects.

- 7.8.7. AA is also a matter of concern as identified within the third party appeal from KWTAG, which considers that there is a direct hydrological link to Natura 2000 sites arising from the proposal to excavate limestone in the catchment of Lough Ree SAC and SPA.
- 7.8.8. In this context, I concur with the response of the first party that an SPR needs to be complete in order to present a risk; and that the mitigation measures as set out within the NIS and framework CEMP would significantly reduce potential risks associated with the project.

8.0 Appropriate Assessment

8.1. Compliance with Article 6(3) of the Habitats Directive

- 8.1.1. The requirements of article 6(3) as related to screening the need for appropriate assessment of a project under part XAB, section 177U of the Planning and Development Act, 2000 (as amended) are considered fully in this section.

8.2. The Natura Impact Statement

- 8.2.1. The application was accompanied by an Appropriate Assessment Screening Report (AASR) dated March 2021, and Natura Impact Statement (NIS) dated March 2023. The NIS was subsequently updated, further to Request for Further Information as issued by the local authority and resubmitted, in January 2024.
- 8.2.2. The planning authority considered that the NIS as submitted did not contain sufficient information to allow the planning authority to complete the Stage 2 Appropriate Assessment and was noted to be as per the NIS which formed part of the previous application on the subject site (P.A. Ref.: PD/21/221; ABP Ref. PL20.312748 refers).
- 8.2.3. The NIS, was updated, taking account of this Further Information request. In summary, the updated NIS was informed by the following:
- A desk top study (based on best scientific knowledge).
 - Validation / ecological survey of site and environs, Feb/April 2023.
 - Winter bird surveys for winter season 2020-2021, and for winter period from Oct 2021-March 2023.
 - Ornithological Surveys 2022-2023 Summary Report.
 - Bird surveys over period 2020 -2023.
 - Collision risk assessment over a 29 month period (Collision Risk Assessment 2023, prepared by MKO).
 - An examination of relevant national and regional databases including EPA NPWS, Birdwatch Ireland, National Biodiversity Data Centre databases and resources.
 - Bat surveys.

8.2.4. The AA Screening Report identified 7 No. European sites within the Zone of Influence (Zol), in this instance, relating to a 10km radius of the proposed development. The NIS document included 16 no. European sites, relating to a 15km radius.

8.2.5. It concluded that significant effects could not be ruled out for following 4 no. sites, namely:

- Lough Ree SPA
- River Suck Callows SPA
- Four Roads Turlough SPA
- Lough Croan Turlough SPA

8.2.6. The NIS concluded that;

‘The assessment identified ex-situ foraging of the proposed development site during winter by Golden Plover and to a lesser extent, by Lapwing, both Special Conservation Interest bird species in a number of SPAs in the surrounding landscape. The potential collision risk to Golden Plover during the operation of the turbine has been assessed as 1 bird collision every two years, while the risk to Lapwing is assessed as one bird every 79 years.

In view of the limited extent of habitat loss associated with the single turbine and the overall availability of similar habitat within the surrounding landscape, the proposed development is not considered at risk of giving rise to any significant effect on the wintering population of either species or effecting their conservation objectives within any European site.’

8.2.7. Further to receipt of this RFI, the local authority subsequently completed Stage 2 of the Appropriate Assessment process of the proposed development, concluding as follows;

‘Potential exists for indirect impacts on the Qualifying Interests of Lough Ree SPA, Rick Suck Callows SPA, Four Roads Turlough SPA and Lough Croan Turlough SPA due to disturbance and collision risk during the operational phase. The Planning Authority note that following the determination of the magnitude of effects predicted, impacts are negligible in terms of the overall population of qualifying interest. The

planning authority is therefore satisfied that the risks to the safeguarding and integrity of the qualifying interests and conservation objectives of the Natura Impact sites described have been assessed and the proposed development has minimal significant impact on the Natura 2000 network.'

8.2.8. Having reviewed the AASR, NIS, EclA and Framework CEMP and the supporting documentation, I am satisfied that it provides adequate information in respect of the survey information, clearly identifies the potential impacts, and does use best scientific information and knowledge. Details of mitigation measures are provided in Section 6 of the NIS, and repeated within the Framework CEMP. I am satisfied that the information is sufficient to allow for appropriate assessment of the proposed development (see further analysis below).

8.3 Stage 1 Appropriate Assessment Screening Report

8.2.9. The site of the proposed development is not located within the boundaries of a European site. In addition, the proposed wind turbine is not directly connected with or necessary to the management of any European site.

8.2.10. The nearest designated site is the Lough Ree SAC (Site Code: 000440) which is c4.4km to the northeast.

8.2.11. Taking account of the characteristics of the proposed development in terms of its location and the scale of works, the following issues are considered for examination in terms of implications for likely significant effects on European sites:

- habitat loss/fragmentation.
- habitat/species disturbance/mortality (construction and/or operational).
- construction related – uncontrolled surface water/silt/construction related pollution.

8.2.12. As identified within the applicant's AASR, the site of the proposed development is relatively remote from any European designated sites and there are no pathways of connectivity to present any direct impacts on any European sites. There are no water features within or close to the subject site.

8.2.13. European sites within Zone of Influence (ZOI) considered for Stage 1 screening, are identified below. This relates to a ZOI of 8km for SACs and 15km for SPAs, having

regard to (i) the height and nature of the proposed turbine (ii) the SCI species for which the SPAs are designated, which I consider appropriate in this instance.

8.2.14. In response to the third-party appeal, the first party notes that the determination of a Zol, accords with the Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities 2010, and understood to relate to the extent of the site where ecological impacts are likely to occur.

European site (Code)	Qualifying Interests (QI)/Special Conservation Interests (SCI)	Distance from Site (km)
Lough Ree SAC (000440)	Natural eutrophic lakes with Magnopotamium or Hydrocharition-type vegetation [3150] Semi-natural dry grasslands and scrubland facies on calcareous substrates [6210] Active raised bogs [7110] Degraded raised bogs still capable of natural regeneration [7120] Alkaline fens [7230] Limestone pavements [8240] Bog woodland [91D0] Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> [91E0] Otter [1355]	4.4km NE
Lough Ree SPA (004064)	Little grebe [A004] Whooper Swan [A038] Wigeon [A050] Teal [A052] Mallard [A053] Shoveler [A056] Tufted duck [A061] Common scoter [A065] Goldeneye [A067] Coot [A125] Golden Plover [A140] Lapwing [A142] Common tern [A193] Wetland and waterbirds [A999]	4.7km NE
Ballinturly Turlough SAC (000508)	Turloughs [3180]	5.1km to NW
Lough Fuunshinagh SAC (000611)	Turloughs [3180] Rivers with muddy banks with <i>Chenopodium rubric</i> p.p. and <i>Bidenton</i> p.p. vegetation [3270]	5.9km to SW
Lisduff Turlough SAC (000609)	Turloughs [3180]	5.9km to SW

European site (Code)	Qualifying Interests (QI)/Special Conservation Interests (SCI)	Distance from Site (km)
River Suck Callow SPA (004097)	Whooper Swan [A038] Wigeon [A050] Golden Plover [A140] Lapwing [A142] Greenland white-fronted goose [A395] Wetland and waterbirds [A999]	76.5km to W
Lough Croan Turlough SAC (000610)	Turloughs [3180]	7.8km to S
Lough Croan Turlough SPA (004139)	Shoveler [A056] Golden Plover [A140] Greenland white-fronted goose [A395] Wetland and waterbirds [A999]	9.2km SE
Four Roads Turlough SPA (004140)	Golden Plover [A140] Greenland white-fronted goose [A395] Wetland and waterbirds [A999]	8.1km to SW

8.3. Consideration of Potential Effects

8.3.1. Conservation objectives for the above European sites are set out below.

1. Lough Ree SAC

From a review of NPWS data, there notable discrepancies between the QIs shown on the NPWS website and those included in the ('Conservation Objectives Series Lough Ree SAC 000440' document published by the NPWS). Of the eight habitats and species included in the document, four (natural eutrophic lakes, semi-natural dry grasslands, degraded raised bogs, and bog woodland) are to restore the favourable conservation condition of the habitats, and the remainder are to maintain the favourable conservation condition of the habitats and species, with the exception of old sessile oak woods whose status as a QI is currently under review.

2. Lough Ree SPA

Generic conservation objectives:

1. To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.
2. To maintain or restore the favourable conservation condition of the wetland habitat at Lough Ree SPA as a resource for the regularly occurring migratory waterbirds that

utilise it. Source: 'Conservation Objectives for Lough Ree SPA [004064]' NPWS document.

3. Ballinturly Turlough SAC

To maintain the favourable conservation condition of Turloughs in Ballinturly Turlough SAC (Source: Conservation Objectives Series Ballinturly Turlough SAC 000588' document).

4. Lough Funshinagh SAC

Conservation objective

To maintain the favourable conservation condition of both habitats cited. (Source 'Conservation Objectives Series Lough Funshinagh SAC 000611' NPWS document).

5. Lisduff Turlough SAC

Conservation objective

To maintain the favourable conservation condition of Turloughs in Lisduff Turlough SAC (Source: NPWS 'Conservation Objectives Series Lisduff Turlough SAC 000609')

6. River Suck Callows SPA

Generic conservation objectives

To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.

To maintain or restore the favourable conservation condition of the wetland habitat at River Suck Callows SPA as a resource for the regularly occurring migratory waterbirds that utilise it.

(Source: Conservation Objectives for River Suck Callows SPA [004097]' NPWS document.)

7. Lough Croan Turlough SAC

'To restore the favourable conservation condition of Turloughs in Lough Croan Turlough SAC...' (Source: The NPWS 'Conservation Objectives Series Lough Croan Turlough SAC 000610' document.)

8. Lough Croan Turlough SPA

Generic conservation objectives

To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.

To maintain or restore the favourable conservation condition of the wetland habitat at Lough Croan Turlough SPA as a resource for the regularly-occurring migratory waterbirds that utilise it.

(Source 'Conservation Objectives for Lough Croan Turlough SPA [004139]' NPWS document).

9. Four Roads Turlough SPA

Generic conservation objectives

Conservation Objectives

To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.

To maintain or restore the favourable conservation condition of the wetland habitat at Four Roads Turlough SPA as a resource for the regularly occurring migratory waterbirds that utilise it. (Source: NPWS document.)

8.4. Potential Impacts

- 8.4.1. As noted within the applicant's AASR/NIS, the construction phase will include the removal of c.1,700m³ of soil, associated with the construction of the access road, turbine foundation and hard standing required for crane mobilisation. This is considered to constitute a minimal extent of soil/removal from site.
- 8.4.2. The site is located at a relatively high level c.+115m ASL, sloping gently to a high point of 165m at Moydow, to the northwest. It is noted that there is no hydrological link to Lough Ree, Lough Funshinagh and therefore there would be no pollution of surface waters affecting any of these waterbodies and the relevant SCIs and QIs.
- 8.4.3. Notwithstanding, having regard to the relative proximity of the SPAs within the study area, their SCI interests, the nature of the proposed development, further assessment is warranted.
- 8.4.4. Although forming part of the updated NIS as submitted to the application, issues relating to displacement of birds from ex-situ sites and interference with flight paths

are matters for further assessment during both construction and operational phases of the proposed development.

- 8.4.5. Based on my examination of the AASR and NIS and all supporting information including the Framework CEMP, EclA the NPWS website, aerial and satellite imagery, the scale and nature of the proposed wind turbine, the nature of the likely effects, limited separation distances, the relationship between the proposed development and the European sites, their SCIs and conservation objectives, taken in conjunction with my assessment of the subject site and the surrounding area, I conclude that a Stage 2 Appropriate Assessment (AA) is required for Lough Ree SPA, River Suck Callows SPA, Four Roads Turlough SPA, Lough Croan Turlough SPA.
- 8.4.6. As noted above, the remaining sites at Lough Ree SAC, Ballunturly Lough SAC, Lisduff Turlough SAC and Lough Croan SAC can be screened out from further assessment having regard to the remote location of the proposed turbine, the lack of any direct or indirect hydrological links or other source pathway receptors between the proposed works and the European sites, and the limited habitat diversity of the development site (consisting of open grasslands with stonewalls sub-dividing fields).
- 8.4.7. It is therefore reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on the following European Site No.s 00440, 000508, 000611, 000609, 000610 in view of the site(s) Conservation Objectives and a Stage 2 Appropriate Assessment is not therefore required for these sites.

8.5. Stage 2 Appropriate Assessment

- 8.5.1. As noted above, the NIS identified 4 no. European sites with potential to be adversely affected by the proposed development; namely:

- Lough Ree SPA
- River Suck Callows SPA
- Four Roads Turlough SPA
- Lough Croan Turlough SPA

- 8.5.2. These sites will be considered together having regard to the range of potential adverse impacts to SCIs within these sites.

Site 1.: Lough Ree SPA

- 8.5.3. Situated on the River Shannon between Lanesborough and Athlone, Lough Ree is the third largest lake in the Republic of Ireland. It lies in an ice-deepened depression in Carboniferous Limestone. Some of its features (including the islands) are based on glacial drift. The main inflowing rivers are the Shannon, Inny and Hind, and the main outflowing river is the Shannon. The greater part of Lough Ree is less than 10 m in depth, but there are six deep troughs running from north to south, reaching a maximum depth of about 36 m just west of Inchmore. The lake has a very long, indented shoreline and hence has many sheltered bays. It also has a good scattering of islands, most of which are included in the site.

Site 2.: River Suck Callows SPA

- 8.5.4. The River Suck Callows SPA is a linear, sinuous site comprising a section of the River Suck from Castlecoote, Co. Roscommon to its confluence with the River Shannon close to Shannonbridge, a distance of approximately 70 km along the course of the river. The river forms part of the boundary between Counties Galway and Roscommon. The site includes the River Suck itself and the adjacent areas of seasonally flooded semi-natural lowland wet callow grassland. The River Suck is the largest tributary of the River Shannon.

Site 3.: Four Roads Turlough SPA

- 8.5.5. Four Roads Turlough (also known as Cloonlaughnan Turlough) is located 6 km south of Athleague, Co. Roscommon and just over 2 km east of the River Suck. It lies below a low scarp of limestone hills and is an open, shallow basin without permanent standing water which floods regularly and dries out early.

Site 4.: Lough Croan Turlough SPA

- 8.5.6. Situated approximately 6 km east of the River Suck in Co. Roscommon, Lough Croan Turlough is a linear wetland, aligned north-west/south-east, which lies in a flattish area of glacial till. It is split into two main parts - the east functions as a typical turlough, with a wet, reedy centre, while the west is a fen, floating in places, which also floods in winter.

Assessment

- 8.5.7. The site is not located within or within immediate proximity to a European site. There is therefore no risk for direct effects during the construction and operational phases of the development.
- 8.5.8. There is however, a number of SPAs designated for the protection of over-wintering migratory bird species and the potential for ex-situ impacts on these (Special Conservation Interest) SCI species, constitute what is considered within the AASR/NIS the only possibility for the proposed project to impact on a European site.
- 8.5.9. In this context, potential indirect effects are considered in section 4.3 of the updated NIS, as summarised below:

Loss of foraging habitat for SCI species

- 8.5.10. As noted above, the site is primarily composed of areas of improved agricultural grassland (GA1) sub-divided by stone walls (BL1). The grassland habitat does not provide suitable habitat for any rare or threatened plant species listed in the Irish Red Data Book or the Flora Protection Order (2015), and there are no records of any protected plant species from the vicinity of the site. There is no evidence of any breeding or resting refugia in the location of the proposed turbine or within the vicinity of the site.
- 8.5.11. The AA/NIS confirms that the was not used for feeding or roosting by any geese or swans during any of the surveys undertaken by Flynn Furney (2021). Golden Plover and Lapwing were recorded foraging on the site but did not roost within the site. The bird surveys recorded regular occurrence of Golden Plover on the site over the winter period with a maximum of 145 birds recorded. Golden Plover is an SCI species for three of the four SPAs in proximity to the site. A single occurrence of Lapwing was recorded. There is no evidence of Whooper Swan or any other SCI species for the SPA's foraging on the site. The population of Golden Plover and Lapwing both fall significantly below the 1% standard required for class as Nationally Important site.
- 8.5.12. The proposed wind turbine will give rise to a localised displacement of foraging by Golden Plover and Lapwing in the immediate vicinity of the proposed turbine, the extent of habitat lost is considered insignificant in terms of the overall availability of

similar habitat within the surrounding landscape. The proposed development is not considered at risk of giving rise to any effect on the wintering population of either species or effecting their conservation objectives within any European site.

Interference with flight paths for SCI species

- 8.5.13. The report notes small flock of Whooper Swan were observed flying over the vicinity of the site on a single occasion during the wintering bird surveys undertaken by Flynn Furney (2021). There were single flights recorded over the site also by Mute Swans (2 birds) and Cormorant (single bird) over the winter surveys.
- 8.5.14. It is considered that there are no features in the landscape may give rise to a preferred flight path, and movement of birds is likely to be somewhat random and influenced by environmental factors including wind speed. As the development relates to a single turbine, it is considered that any displacement would be restricted to a narrow zone.
- 8.5.15. The small numbers and isolated observations in tandem with the open nature of the landscape and the distance between key foraging or roosting areas for the three species, would suggest that the site does not represent a significant commuting/migratory corridor for any bird species.

Collision Risk for SCI species

- 8.5.16. A Collision Risk Assessment was undertaken and the results presented in Table 7 of the AASR/NIS, as included in the table below. (To note, there is a double entry for Black-headed Gull in this table, and what is assumed to be the accurate entry is included in the table below).
- 8.5.17. Notwithstanding, as noted above with respect to biodiversity, I consider this collision risk report to be generally clear, without excessive errors, and consistent with an assessment for this type of development.
- 8.5.18. The assessment predicts that the collision risk is negligible for the species Common Gull, Kestrel, Lapwing, Mallard, Mute Swan, Sparrowhawk and Whooper Swan. One or more collisions over the lifetime of the wind farm is predicted for the species Black-headed Gull, Buzzard, Golden Plover, Cormorant, Herring Gull and Lesser Black-backed Gull.

8.5.19. A collision risk assessment was undertaken for four species recorded which are listed as SCI of SPAs within 15km radius of the proposed turbine, Golden Plover, Lapwing, Mallard and Whooper Swan. The report estimates that the collision risk for Golden Plover to be 0.6 per year, or 19 Golden Plover over the lifetime of the turbine. Annual mortality of Golden Plover is calculated at 27% per annum. The EcIA confirms that if 0.6 golden plover collisions were to occur per year, it would mean that the losses at the site would increase the annual mortality of the county population by 0.1%. This corresponds to a negligible effect on the county population.

8.5.20. As noted above, small numbers of Lapwing, Mallard and Whooper Swan have been recorded within the study area. The predicted collision risk is negligible for these three SCI species over the lifetime of the wind farm.

Species	Survey Period	Model	Transits	Collision Risk (%)	Collision Rate	Est collision over 30 years (birds)	One bird collision
Black-headed Gull	Winter	Random	288.0	4.8	0.277	8.3	4 years
Buzzard	All	Random	96.9	5.18	0.100	3.01	10 years
Common Gull	Winter	Random	24.2	4.89	0.024	0.71	42 years
Golden Plover	October to April	Random	741.3	4.36	0.646	19.39	2 years
Kestrel	Winter	Random	3.9	4.79	0.009	0.28	108 years
Lapwing	Winter	Random	13.5	4.66	0.013	0.38	79 years
Mallard	Breeding	Random	1.4	4.78	0.001	0.04	758 years
Mute Swan	Winter	Random	4.4	7.55	0.002	0.05	597 years
Sparrowhawk	All	Random	7.2	4.77	0.007	0.2	147 years
Whooper Swan	Winter	Random	3.0	7.4	0.001	0.03	914 years
Cormorant	All	Regular	70.9	6.05	0.086	2.57	<1 year
Herring Gull	All	Regular	94.6	5.49	0.104	3.12	12 years
Lesser black-backed Gull	All	Regular	378.6	5.55	0.42	12.59	2 years

8.6. Consideration of potential adverse effects

Potential direct adverse effects

- 8.6.1. There are no significant potential direct adverse effects on this site during the construction and operational phases as the proposed development would not be located within these sites.

Potential indirect adverse effects

- 8.6.2. Due to the localised nature of this single turbine within the site is unlikely to lead to total displacement from the site of either species, and is therefore rated as minor adverse effect.

- 8.6.3. Potential collision risk to Golden Plover during the operation of the turbine has been assessed as one collision every 2 years, while the risk to Lapwing is assessed as one every 79 years. This is considered to be minor in scale and would not constitute a significant effect on any European Site or its conservation objectives and therefore no mitigation is required.
- 8.6.4. As noted above, a single observation was made during the winter surveys of four Whooper Swan flying over the site. This suggests that the proposed turbine is not regularly used as foraging area nor does it lie on a regularly used flight path for this species, and the risk of collision or displacement is therefore considered negligible.
- 8.6.5. The NIS confirms that the potential risk from the proposed development on European sites arises from potential loss of foraging habitat and the collision risk to Golden Plover and Lapwing.
- 8.6.6. During construction phase, potential adverse impacts arise on ground nesting species (in particular the Red listed Meadow Pipit). Mitigation measures as noted will ensure that there are no adverse impacts to this and other species.
- 8.6.7. While there are no surface watercourses on the site, there are a number of small depressions which hold water. To avoid indirect impacts on these features however, a series of specific measures has been developed to mitigate against potential impacts that may arise from the construction of the proposed wind turbine and access track on the surface water features as detailed below.

8.7. Potential In-Combination Effects

- 8.7.1. The NIS as submitted confirms that there are no projects or plans that have been identified as posing a risk of giving rise to significant in-combination effects on any European sites in the vicinity of the proposed development.
- 8.7.2. The NIS notes that general agricultural activities in the catchment are likely to result in some nutrient enrichment and increased levels of suspended solids in surface waters which will potentially effect water quality in the various European sites. However, these activities are on-going and not subject to AA and are thus excluded from consideration.
- 8.7.3. Potential in-combination effects could arise with respect to permitted/proposed development, including Skrine wind farm; permission for 20 turbines at Seven hills

wind farm, c.11km to the south (ABP Ref.: 3057075-20); an EOD for two turbines permitted under PA Reg. Rf. 11/126, c.10km to the north (P.A. Ref 21/3007).

- 8.8. Having regard to the significant separation distance between the subject proposal, it is considered unlikely that the proposed development would result in any in-combination effects with respect to bird strike and flight paths of SCI species of adjoining SPAs.
- 8.9. The AASR and NIS do not include reference to the future ESB Connection works. Section 3.1.3 of the E&PR reconfirm that these works do not form part of the subject application, and I concur with this assessment.
- 8.10. Notwithstanding, it is noted that the connection would include a 1.8km underground cable route from the on-site substation travelling west, principally along a public road and agricultural lands to Skrine wind farm, before connecting to an overhead line between Skrine wind farm and the existing 38kV Roscommon substation. The route does not appear that any waterways would be crossed, and there are no European sites along this route.
- 8.11. Having regard to the nature and route of this connection, and distance to the closest European sites, I do not consider that these would work have any adverse impacts on any European site.
- 8.11.1. As such, in my opinion, I consider that the proposed development, would not result in any adverse in combination effects.

8.12. Mitigation Measures

- 8.12.1. Mitigation measures to reduce or avoid potential adverse effects from the identified sources from the proposed development on the integrity of the 4 no. European sites, include the following, as set out in Section 6 of the NIS and in greater detail within the Framework CEMP.

Protection of Habitat

- 8.12.2. In order to avoid impacting on ground nesting bird, topsoil stripping site will take place outside of the bird breeding season (March to August inclusive) and be confined to the minimum necessary to undertake the construction works.
- 8.12.3. Measures to mitigate potential impacts that may arise from the construction of the proposed wind turbine and access track to include the following;

- Installation of silt fences around any stockpiled topsoil to prevent sediment run-off.
- Prevention of accidental spillage of fuel/oil diesel during construction phase, all on site refuelling of construction machinery and vehicles to designated area.
- Storage of fuels or other chemicals on site will be within mobile bunded units located in the temporary refuelling compound only. Welfare facilities to be changed over and not emptied on site.
- During the concrete pour for the construction of the turbine base and refuelling area all appropriate formwork and shuttering methods will be employed to prevent any run-off and hold all concrete until set. Excavations will be de-watered prior to pour and pour would only occur during dry weather.
- Temporary welfare and kitchen facilities on site to be located within temporary compound area between substation and refuelling area.
- Temporary hardstand areas and temporary welfare facilities will be removed after the construction phase.
- All machine operators will be made aware of the refuelling procedure required on site as part of the Framework CEMP. This will include the operational valve in the sump of the bunded area and the contents and use of the spill control equipment.

8.13. Residual Effects

8.13.1. The NIS does not identify residual impacts within the NIS.

8.13.2. Notwithstanding, it is considered that, upon application of the mitigation measures, the proposed development poses no risk of adverse residual effects on the conservation objectives, of the qualifying interest habitats of the European site, either alone or in combination with other plans or projects.

8.14. Conclusion

8.14.1. As noted above, the assessment identified ex-situ foraging of the proposed development site during winter by Golden Plover and Lapwing, both SCI bird species within a series of SPAs in the surrounding landscape. The potential collision risk to

Golden Plover during the operation of the turbine has been assessed as one bird collision every 2 years, and that to Lapwing, as one every 79 years.

8.14.2. In view of the limited extent of habitat loss associated with the single turbine and availability of similar habitat within the surrounding landscape, the proposed development is not considered at risk of giving rise to any significant effect on the wintering population of either species or effecting their conservation objectives within any European site.

8.14.3. Considering all of the above, I am satisfied, beyond all reasonable scientific doubt, that there will be no adverse effects on the integrity of any European site, as a result of the proposed development, either individually or in combination with other plans and projects.

8.15. Appropriate Assessment Conclusions

8.15.1. Having regard to the foregoing, I consider that it is reasonable to conclude on the basis of the information on the file, which I consider adequate in order to carry out a Stage 2 Appropriate Assessment, that the proposed development, individually or in combination with other plans and projects would not adversely affect the integrity of the following European sites or any other European site, in view of the site's Conservation Objectives.

- Lough Ree SPA
- River Suck Callows SPA
- Four Roads Turlough SPA
- Lough Croan Turlough SPA

8.15.2. As detailed above, this is on the basis of, notably:

- The small numbers and isolated observations for SCI species, in tandem with the open character of the site, suggesting that the site does not constitute a significant commuting/migratory corridor for any bird species.
- The negligible collision risk identified for these species over the lifetime of the single turbine wind farm.
- the limited extent of habitat loss and availability of similar habitats in the vicinity of the site, for in particular, Golden Plover and Lapwing. This supports

the position that the proposed development is not considered at risk of giving rise to any effect on the wintering population of these species or effecting the conservation objectives within any European site.

9.0 Recommendation

I recommend that planning permission should be granted, for the reasons and considerations set out below, and subject to the attached conditions.

10.0 Reasons and Considerations

Having regard to the nature and scale of the proposed development, the provisions of the Climate Action Plan 2024, Wind Energy Guidelines for Planning Authorities (2006), the policies and objectives of the Roscommon County Development Plan, 2022-2028, the distance to dwellings and European sites, it is considered that, subject to the conditions below, the proposed development would not cause adverse impacts on the residential or visual amenities of the area or of property in the vicinity, would not significantly impact on biodiversity, European sites, or archaeological resource; and would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

11.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars received by the planning authority on the 29th September 2024 and further information received on 15th February 2024 and the 12th March 2024, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. The mitigation measures contained in the submitted Natura Impact Statement shall be implemented.

Reason: To protect the integrity of European Sites.

3. The mitigation measures contained in the submitted framework CEMP shall be implemented.

Reason: To protect the environment.

4. The period during which the development hereby permitted may be carried out shall be 30 years from the date of the first commissioning of the wind energy development.

Reason: To enable the Planning Authority to review its operation in light of the circumstances at then prevailing.

5. This permission shall not be construed as any form of consent or agreement to a connection to the national grid or to the routing or nature of any such connection.

Reason: In the interest of clarity.

6. The operation of the proposed development, by itself or in combination with any other permitted wind energy development, shall not result in noise levels, when measured externally at nearby noise sensitive locations, which exceed:

(a) Between the hours of 0700 and 2300:

(i) the greater of 5 dB(A) L90,10min above background noise levels, or 45 dB(A) L90,10min.

And

(b) 43 dB(A) L90,10min at all other times, where wind speeds are measured at 10 metres above ground level.

Reason: In the interest of residential amenity.

7. The following design requirements shall be complied with:
- a) Cables within the site shall be laid underground;
 - b) The wind turbine shall be geared to ensure that the blades rotate in the same direction.
 - c) No advertising material shall be placed on or otherwise be affixed to any structure on the site without a prior grant of planning permission.

Reason: In the interest of visual and residential amenity.

8. In the event that the wind energy development causes interference with telecommunications signals, effective measures shall be introduced to minimise interference with telecommunications signals in the area. Details of these measures, which shall be at the developer's expense, shall be submitted to, and agreed in writing with, the Planning Authority prior to commissioning of the turbine and following consultation with the relevant authorities.

Reason: In the interest of protecting telecommunications signals and residential amenity.

9. Prior to commissioning of the turbine, the developer shall inform the Planning Authority and the Irish Aviation Authority of the 'as constructed' tip heights and co-ordinates of the turbine.

Reason: In the interest of air traffic safety.

10. The developer shall retain the services of a suitably qualified and experienced Ecologist to undertake pre-construction surveys at the various project elements, immediately prior to commencing work in order to check for the presence of protected species in the vicinity including badgers, otters, deer, nesting birds and bats. A 500 metre buffer should be placed around any protected bird species nest sites and maintained free from construction works until the nest is vacated. Derogation licences shall be obtained as required.

Reason: In the interests of protecting ecology and wildlife in the area.

11. An Invasive Species Management Plan shall be prepared by suitably qualified professionals and shall be submitted for the written agreement of the Planning Authority, in conjunction with Roscommon County Council's Environment Department. The agreed Plan shall thereafter be adhered to.

All plant and machinery used during the works should be thoroughly cleaned and washed before delivery to the site to prevent the spread of hazardous invasive species and pathogens.

Reason: In the interests of proper planning and sustainable development of the area.

12. Site development and building works shall be carried out only between the hours of 0700 to 1900 Mondays to Friday inclusive, and not at all on Saturdays, Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances.

Reason: To protect the amenities of nearby residential properties.

13. The developer shall facilitate the preservation, recording and protection of archaeological materials or features that may exist within the site. In this regard, the developer shall -

- a) Notify the Planning Authority in writing at least four weeks prior to the commencement of any site operation (including hydrological and geotechnical investigations) relating to the proposed development;
- b) Employ a suitably-qualified archaeologist who shall monitor all site investigations and other excavation works; and
- c) Provide arrangements, acceptable to the Planning Authority and the Department of Housing, Local Government and Heritage, for the recording and for the removal of any archaeological material which the Authority and / or the Department considers appropriate to remove.

Reason: In order to conserve the archaeological heritage of the site and to secure the preservation and protection of any remains that may exist within the site.

14. Prior to commencement of development, a Resource Waste Management Plan (RWMP) as set out in the EPA's Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects (2021) shall be prepared and submitted to the planning authority for written agreement. The RWMP shall include specific proposals as to how the RWMP will be measured and monitored for effectiveness. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.

Reason: In the interests of reducing waste and encouraging recycling.

15. Existing road drainage shall not be impaired by the proposed development of the access and all roadside works shall be designed and shaped or otherwise treated to ensure the uninterrupted flow of road surface water run-off. The applicants/developer shall be responsible for the cost of any repairs to the public road deemed necessary as a result of any damage done to this road, to facilitate the development hereby granted.

Reason: In the interest of protection of public health and traffic safety.

16. Prior to commencement of development, a Transport Management Plan for the construction stage shall:
 - (a) be submitted to, and agreed in writing with, the Planning Authority, in conjunction with Roscommon County Council's Roads Department and Athlone Municipal District Co-Ordinator. The Traffic Management Plan shall incorporate details of the road network to be used by construction traffic, including over-sized loads, and detailed arrangements for the protection of roads, bridges, culverts or other structures to be traversed, as may be required. The plan should also contain details of how the developer intends to engage with and notify the local community in advance of the delivery of

oversized loads. Any works, including reinstatement works, shall comply with Transport Infrastructure Ireland (TII) standards as outlined in TII Publications, County Council roads requirements, and shall be subject to a Road Safety Audit as appropriate. The agreed Transport Management Plan shall thereafter be adhered to.

(b) The developer shall consult with all service providers (including Uisce Éireann) in relation to proposed delivery routes. Roscommon County Council's Roads Department and Athlone Municipal District Co-Ordinator shall be advised of any alterations required. Any proposed alterations affecting the width of the existing road shall only be considered in consultation with RCC. If agreed, and roads are widened, the specification shall be that of the existing road at a minimum.

(c) A detailed programme of deliveries shall be submitted to Roscommon County Council's Roads Department and Athlone Municipal District Co-Ordinator in advance of commencement of deliveries. Details to include dates and times, number of loads, weights, road closure and diversion routes, support vehicles, etc.

(d) Where relevant, abnormal load permits shall be obtained, in advance, from Roscommon County Council.

Reason: To prevent damage to the public road and in the interests of traffic safety.

17. Prior to the commencement of development, a pre-condition survey of delivery routes, consisting of a video survey and photographs, and a detailed survey of all node locations shall be carried out and a copy submitted to the Planning Authority for written agreement, in conjunction with Roscommon County Council's Roads Department and Athlone Municipal District Co-Ordinator. Surveys at nodes shall include drainage, landscaping, surfacing, boundary fences/hedges/gates, signage. A Road Condition Survey, and an FWD Survey where required by Roscommon County Council's Roads Department, shall be carried out and a copy submitted for the written agreement of same. Where the Planning

Authority/Roads Authority consider a proposed haul route is not in a suitable condition, the developer shall upgrade the road or junction in advance of haulage operations, to the agreed specification of Roscommon County Council's Roads Department and Athlone Municipal District Co-Ordinator. All such works shall be undertaken at the developer's expense. Any defects that appear during the haulage period shall be rectified by the developer and damage caused to the road shall be repaired to its previous condition, to the satisfaction of the Planning Authority/Roads Authority.

Reason: To prevent damage to the public road and in the interests of traffic safety.

18. On full or partial decommissioning of development, or if the wind energy development ceases operation for a period of more than one year, the turbine concerned and all decommissioned structures shall be removed, and foundations covered with soil to facilitate re-vegetation, all to be completed to the written satisfaction of the planning authority within three months of decommissioning or cessation of operation.

Reason: In the interest of landscape restoration upon cessation of the project.

19. The applicant / developer shall give the Planning Authority two weeks' notice in writing of intent to commence development on the site.

Reason: To protect the amenities of nearby residential properties.

20. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the

application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

21. Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or such other security as may be acceptable to the planning authority, to secure the reinstatement of public roads which may be damaged by the transport of materials to the site, coupled with an agreement empowering the planning authority to apply such security or part thereof to the satisfactory reinstatement of the public road. The form and amount of the security shall be as agreed between the planning authority and the developer or, in default of agreement, shall be referred to An Bord Pleanála for determination.

Reason: In the interest of traffic safety and the proper planning and sustainable development of the area.

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.

Aoife McCarthy
Planning Inspector

13th January 2025

Form 1

EIA Pre-Screening

An Bord Pleanála Case Reference	319800-24		
Proposed Development Summary	Construction of a 4.2 MW wind turbine with overall tip height of 149.38m, wind hardstanding area, a substation building (55m ²), all associated works including site access track and underground cabling from site entrance to Wind Energy Converter. The project will have a 30-year lifespan.		
Development Address	Kilcash, Co. Roscommon		
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)	Yes	X	
	No		
2. Is the proposed development of a CLASS specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended)?			
Yes	X	Schedule 5, Part 2 (3) (Energy Industry) (i) – Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts'.	Proceed to Q3.
No			Tick if relevant. No further action required
3. Does the proposed development equal or exceed any relevant THRESHOLD set out in the relevant Class?			
Yes			EIA Mandatory EIAR required
No	X	Wind farms with more than 5 turbines or having a total output greater than 5 megawatts.	Proceed to Q4
4. Is the proposed development below the relevant threshold for the Class of development [sub-threshold development]?			
Yes	X	The proposed development consists of 1 turbine with output of 4.2 megawatts.	Preliminary examination required (Form 2)

5. Has Schedule 7A information been submitted?		
No	X	Pre-screening determination conclusion remains as above (Q1 to Q4)
Yes		Screening Determination required

Inspector: _____

Date: 13th January 2025

Form 2

EIA Preliminary Examination

An Bord Pleanála Case Reference	ABP-319800-24
Proposed Development Summary	Construction of a 4.2 MW wind turbine with overall tip height of 149.38m, wind hardstanding area, a substation building (55m ²), all associated works including site access track and underground cabling from site entrance to Wind Energy Converter. The project will have a 30-year lifespan.
Development Address	Kilcash, Co. Roscommon
<p>The Board carried out a preliminary examination [ref. Art. 109(2)(a), Planning and Development regulations 2001, as amended] of at least the nature, size or location of the proposed development, having regard to the criteria set out in Schedule 7 of the Regulations.</p> <p>This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.</p>	
<p>Characteristics of proposed development</p> <p>(In particular, the size, design, cumulation with existing/proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).</p>	<p>A Section 5 Declaration will be made with respect to future ESB connection works, including a 1.8km underground/overground route to the ESB Roscommon 38kV substation.</p> <p>The subject turbine and existing Skrine wind farm are expected to operate below the noise criteria, at all wind speeds.</p> <p>From landscape /visual impact perspective, existing turbines at Skrine wind farm are sufficiently distanced from the site so as to appear as two distinct developments within the landscape.</p> <p>The site is within 4.4km of the nearest designated sites at Lough Ree SAC and SPA. The</p>

	<p>NIS identified ex-situ foraging within the development site during winter by Golden Plover and Lapwing, both SCI bird species, in a series of SPAs in proximity to the site.</p> <p>An NIS concludes that there will be no adverse effects on the integrity of any European site, as a result of the proposed development, either individually or in combination with other plans and projects, and that no reasonable scientific doubt remains in this regard.</p> <p>There are no demolition works associated with the development.</p> <p>The project will require aggregates and energy during the construction phase; however, it is anticipated that this will not have a significant effect on natural resources overall.</p> <p>The proposal will include the removal of 1,700m³ of soil as part of the project. Overall, this volume is considered small, and the impact of soil excavation also does not constitute a significant use of this resource.</p> <p>The Knockcroghery River is located c. 2.8km to the west of the proposed turbine. During operational phase, run off will be directed towards open drain channels, including along the side of the access track.</p>
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	<p>Mitigation measures within the CEMP are designed to ensure there will be no impacts on the water environment.</p> <p>The primary objective is to support the reduction in use of fossil fuel resources, to generate electricity, with fewer adverse. The proposed development is not anticipated to have significant effect, in terms of waste generation and management, pollution and nuisance.</p> <p>The proposed development is not anticipated to have significant risks in term of potential accidents or adverse risk to climate change.</p> <p>A Shadow Flicker Assessment has concluded that shadow demands would be exceeded at 9 shadow receptors. On this basis, a shadow shut off system will be installed in the proposed wind turbine, thereby ensuring that any impacts will be avoided. predicted operational noise levels are not expected to exceed the worst-case noise criteria. No significant vibration effects are associated with the operation of the site.</p> <p>Mitigation measures within the CEMP are intended to protect impacts on the water environment.</p> <p>The project is not anticipated to present risks to human health.</p>
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<p>Location of development</p> <p>(The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).</p>	<p>The closest settlement to the site, Knockcroghery village, is located 3.8km to the east of the subject site.</p> <p>Skrine Wind Farm is located c. 2.2km to the west of the site.</p> <p>Habitats at and in the environs of the site consist primarily of improved grassland, which are grazed by sheep.</p> <p>The closest heritage area to the site is Lough Ree SAC, located c 4.4km to the northeast.</p> <p>There are four SPAs located within 15km of the site. In this context, the assessment identified ex-situ foraging by Golden Plover and Lapwing, both SCI bird species of these SPAs.</p> <p>The project is anticipated to result in an overall significance of no greater than Moderate slight within 1km of the site, with Slight or Imperceptible landscape impacts within the wider 20km catchment.</p> <p>Visual impacts were assessed at eight viewpoint. The significance of the impacts ranged from Moderate and Imperceptible. Four of these are without vegetative screening, representing worst case scenario in terms of visual exposure from the public sphere.</p> <p>VP2, a designated view within the Roscommon CDP, is expected to experience a moderate impact.</p> <p>There are no recorded monuments within 350m of the site. There are four located between 350 – 500m of the site.</p>
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<p>Types and characteristics of potential impacts</p> <p>(Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).</p>	<p>The proposed Project is not significant in size and design within a site of c.4.4ha.</p> <p>The works for the proposed Project will also require the installation of an overground and underground grid connection from the site.</p> <p>The Project, has local, regional and national planning policy support, facilitating the delivery of renewable energy into the national electricity grid. This is considered a positive and long-term benefit.</p> <p>There may be some potential short-term negative impacts associated with the construction phase. However, it is considered that with the implementation of mitigation measures and construction best practise, these can be effectively avoided and are therefore not significant.</p> <p>In conclusion, it is considered that, by reason of the nature, scale and location of the subject site, the proposed development, would not be likely to have significant effects on the environment, and that on preliminary examination, an environmental impact assessment report for the proposed development is not necessary in this case.</p>	
Conclusion		
Likelihood of Significant Effects	Conclusion in respect of EIA	Yes or No
There is no real likelihood of significant effects on the environment.	EIA is not required.	Yes
There is significant and realistic doubt regarding the likelihood of significant effects on the environment.	Schedule 7A Information required to enable a Screening Determination to be carried out.	No

There is a real likelihood of significant effects on the environment.	EIAR required.	No
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Inspector:

Date: 13th January 2025

DP/ADP: _____

Date: 13th January 2025

(only where Schedule 7A information or EIAR required)