



An
Coimisiún
Pleanála

Inspector's Report ACP-323449-25

Development

Proposed alterations to the terms of the permitted development granted under reference number ABP-313750-22.

Location

located in Turrock, Cronin, Gortaphuill, Glenrevagh, Tullyneeny, Bredagh, Cuilleenirwan, Cuilleenoolagh, Curry, Miltown, Tobermacloughin, Skeavally, Boleyduff, Clooncaltry, Feacle, Cam, Tawnagh and other townlands in County Roscommon.

Planning Authority

Roscommon County Council

Requester

Energia Renewables ROI Ltd

Type of Application

Application under Section 146B of the Planning and Development Act, 2000 (as amended) to alter previously approved Strategic Infrastructure Development.

Inspector

Paul Kelly

Date of site inspection

15th January 2026

1. Introduction

On the 23rd of November 2023, the Commission under ref. no. ABP-313750-22, granted permission under section 37G of the Planning and Development Act 2000, as amended (the Act), to Energia Renewables Ireland Limited for the following development within the townlands of Turrock, Cronin, Gortaphuill, Glenrevagh, Tullyneeny, Bredagh, Cuilleenirwan, Cuilleenoolagh, Curry, Milltown, Tobermacloughlin, Skeavally, Boleyduff, Clooncaltry, Feacle, Cam, Tawnagh, Cornageeha, Pollalaher, Brideswell, Knocknanool, Ballymullavill, Rooskagh, Bellanamullia, Cloonakille, Monksland and Commeen (west of Athlone), in County Roscommon:

The proposed windfarm development comprised of the following: -

- i. 20 x c.6MW wind turbines with an overall ground to blade tip height of 180 metres, a rotor diameter of 162 metres and a hub height of 99 metres, associated foundations, hard-standing areas. (Total generating capacity of c.120MW.)
- ii. 15 spoil storage areas at hardstands of turbines number 1, 2, 3, 4, 5, 6 & 7 (in the townlands of Turrock, Cortaphuill, Cronin and Tullyneeny) and turbines number 8, 10, 11, 13, 14, 17, 19 & 20 (in the townlands of Milltown, Cuilleenoolagh, Cloonacaltry, Feacle and Tawnagh).
- iii. Provision of 1 no. permanent meteorological mast with a maximum height of 100 metres for a period of 30 years from the date of commissioning of the entire wind farm.
- iv. Provision of 1 no. 110kV onsite substation in the townland of Cam, along with associated control buildings, MV switchgear building, associated electrical plant, associated security fencing, and equipment and wastewater holding tank.
- v. All underground electrical and communication cabling connecting the proposed wind turbines to the proposed onsite substation and associated control buildings and plant.
- vi. All works associated with the connection of the proposed wind farm to the national electricity grid via underground 110kV cabling from the site to the existing Athlone 110kV substation located in the townland of Monksland (c

- 11km E). Cabling will be placed within the public road corridor of the R363, R363 and L2047, or on private land.
- vii. Upgrade works to the existing 110kV Athlone substation consisting of the construction of an additional dedicated bay to facilitate connection of the cable.
 - viii. Provision of 2 no. new site accesses north and south from the R363 and upgrade of 1 no. junction south of the R363.
 - ix. Provision of new access tracks or roads and upgrade of existing access tracks or roads.
 - x. 7 no. overburden storage areas.
 - xi. 2 no. temporary construction compounds.
 - xii. Site drainage works.
 - xiii. Operational stage site signage.
 - xiv. All associated site development works, apparatus and signage.

The application for the development included an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS).

A 10-year planning permission and 30-year operational life span was sought.

Permission was granted subject to 26 no. conditions. The Commission will note that three wind turbines (T9, T10 & T12) within the Southern Turbine Cluster and the Killeglan Karst Landscape (which is a County Geological Heritage site of National Importance) were omitted by Condition No.4. The turbines were omitted in order to protect visual integrity and geological heritage in accordance with Policy NF 10.11 of the Roscommon County Development Plan 2022-2028 which seeks to preserve and protect sites of county geological importance from inappropriate development where they comprise designated sites or national heritage areas.

The subject application to the Commission is for alterations to this permission, under section 146B of the Act.

2. Legislative Provisions

Section 146B(1) of the Planning and Development Act 2000 (as amended) (the Act), provides that, subject to subsections (2) to (8) and to section 146C, upon request of any person who is carrying out or intending to carry out a strategic infrastructure

development, the Commission may alter the terms of the development the subject of planning permission, approval or other consent granted.

Under sub-section 2(a), as soon as practicable after making such a request, the Commission is required to make a decision as to whether the making of the development would constitute a material alteration to the development concerned.

Under sub-section (2)(b), before making its decision under sub-section 146B (2), the Commission may invite submissions as it considers appropriate and is required to have regard to any submission made to it on foot of the invitation.

Under sub-section (3)(a), if the Commission decide that the making of the alteration would not constitute a material alteration, it is required to alter the planning permission/approval/consent accordingly and to notify the requester and the planning authority of the alteration.

Under subsection (3)(b), if the Commission decide that the making of the alteration would constitute the making of a material alteration, the Commission is required to:

- Request the information specified in Schedule 7A, unless it or an EIAR has already been provided by the requester (sub-section (3)(b)(i)). This information is required to be accompanied by any further relevant information on the characteristics of the alteration and its likely significant effects on the environment including, where relevant, how environmental effects pertaining to EU legislation other than the EIA Directive have been taken into account (sub-section (3A)) and can include mitigation measures (sub-section (3B)).
- Following receipt of such information, determine whether to make the alteration, make an alteration of the terms of the development which differs from the proposed alteration (subject to it not representing a more significant alteration), or refuse to make the alteration (sub-section (3)(b)(ii)).

Under subsection (4), before making a determination under sub-section (3)(b)(ii), the Commission is required to determine whether the extent and character of the alteration being requested, or being considered by the Commission, would be likely to have significant effects on the environment.

Under subsection (5), if the Commission determine that no significant environmental effects will arise, they proceed to make a determination under subsection (3)(b)(ii). If

the Commission determines that significant effects will arise, the provisions of section 146C apply. These provisions relate to the preparation of an environmental impact assessment report.

Under subsection (7)(a), in making their determination, the Commission is required to have regard to:

- The criteria for the purposes of determining which classes of development are likely to have significant effects on the environment set out in any regulations made under section 176,
- The criteria set out in Schedule 7 to the Planning and Development Regulations 2001,
- The Schedule 7A information submitted by the requester,
- The further relevant information, if any, referred to in subsection (3A) and the description, if any, referred to in subsection (3B) (summarised above),
- The available results, where relevant, of preliminary verifications or assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive, and
- Whether the development is situated in or would have potential to impact on a European site, or a recognised or protected area of natural heritage,

Under subsection (7)(b), the Commission is required to include in its determination, the main reasons and considerations, with reference to the relevant criteria listed in Schedule 7 to the Planning and Development Regulations 2001, on which the determination is based.

Under subsection (8)(a) before making a determination under subsection (3)(b)(ii) or (4) the Commission is required to require the requester to make information about the alteration available for inspection, notify appropriate persons that the information is available and invite submissions or observations from these persons. Further under subsection 8(b) the Commission is required to have regard to these submissions in its determination.

3. Planning History

3.1 Previous planning history on the subject site:

- **ABP PL20.244346** and **ABP PL20.244347** refer to two separate applications by Galetch Energy Developments Ltd for windfarm developments which were initially granted by Roscommon County Council on 04/10/2011 and 17/08/2012 respectively. **ABP PL20.244346** (P.A. Ref. 10/541) refers to the proposed development of a 16 no. turbine windfarm on lands which generally correlate with the permitted northern turbine cluster of the subject development. **ABP PL20.244347** (P.A. Ref. 11/273) refers to the proposed development of a 19 no. turbine windfarm on lands which generally correlate with the permitted southern turbine cluster of the subject application. Both applications were refused planning permission by the Board on 28th February 2017 following a third-party appeal and JR of the Boards original decisions to grant planning permission.

A single (broadly similar) refusal reason issued in both cases, which in respect of **ABP-PL20.244346** specifically stated:

“On the basis of the information provided with the application and appeal, including the Environmental Impact Statement (EIS) and the Natura Impact Statement (NIS) contained therein (Appendix 7.2) and subsequent revisions to the NIS submitted to the planning authority with additional information on the 10th day of August, 2011 and the later revision of June 2012 and also including the additional information submitted to An Bord Pleanála on the 6th day of June, 2013 and on the 18th day of May 2015, the Board is not satisfied, having regard to the precautionary principle, that there is reasonable scientific certainty that the proposed development would not adversely affect the integrity of European Sites in the vicinity in the light of the conservation objectives and qualifying interests for which these sites were designated. In particular, it is considered that the hydrogeological and geotechnical investigations carried out do not demonstrate to a reasonable level of scientific certainty that the excavations and construction works required to carry out the development would not adversely impact on the turloughs which are qualifying interests of the Lough Croan Turlough Special Area of Conservation (site code 000610), the Four Roads Turlough Special Area of Conservation (site code 001637) and the Lisduff Turlough Special Area of

Conservation (site code 000609).

It is also considered that it has not been demonstrated beyond reasonable scientific doubt that the development would not contravene the conservation objectives for some of the qualifying interests of the nearby Special Protection Areas. In particular, it is considered that there is a risk of contravening the conservation objectives for Greenland White Fronted Goose at Lough Croan Special Protection Area (site code 004139) and other Special Protection Areas, Golden Plover at Lough Croan Special Protection Area and other Special Protection Areas, and Lapwing at the River Suck Callows Special Protection Area (site code 004097) and other Special Protection Areas. There is also uncertainty in relation to the impact on the conservation objectives for Whooper Swans at the River Suck Callows Special Protection Area (site code 004097), and Black Headed Gulls at the Middle Shannon Callows Special Protection Area (site code 004096).

It is considered that inadequate surveys and investigations have been carried out in relation to day and night movements, flight lines and foraging activities of Golden Plover and Lapwing. Having regard to the uncertainty which exists, in relation to the impact of the development on the qualifying interests and consequently the integrity of the European Sites in the area, the Board is precluded from granting planning permission by reason of Article 6(3) of the EU Habitats Directive and of Section 177V (3) of the Planning and Development Act 2000, as amended.”

I note that the Inspector recommended a second reason for refusal based on the visual amenities of the area, but the Board noted the ‘moderate value’ of the receiving landscape, that the site lay within land designated as “most favoured” for renewable energy (RES) and considered the landscape to be robust and capable of accommodating the windfarm.

- **ABP-PL20.313999-22** refers to an application by Energia Renewables Ireland Limited for erection of a temporary meteorological mast which was withdrawn on 4th September 2023. This application site is located within the permitted northern turbine cluster of the subject development.
- **ACP-324004-26** refers to an application by the applicant Energia Renewables Ireland Limited under Section 146B of the Act to alter the

parent permission ABP-313750-22 in this case, to omit approx. 9km to 110kV underground cabling and associated ancillary infrastructure between Brideswell and the Athlone 110kV substation together with the omission of upgrades to the Athlone 110kV substation, the re-routing of wind farm cabling and construction of approx. 520m of wind farm access track and installation of approx. 760m of windfarm cabling. This application was received on 19th December 2025 and at the time of writing remains under assessment.

3.2 Planning permission granted on the subject site:

- **ABP-307075-20** – refers to the Board’s Notice to the applicants under Section 37B(4)(a) of the Planning and Development Act, 2000 (As amended) confirming that the proposed development would constitute strategic infrastructure.
- **ABP-313750-22** refers to a grant of planning permission on the subject site (as described at Section 1 above) for a windfarm development comprising 20 no. turbines with a hub height of 99 metres, a rotor diameter of 162 metres and an overall tip height of 180 metres, together with a 110kV substation and other associated development.

Condition No.4 states:

“The design and layout of the development shall be amended to omit the three wind turbines T9, T10 and T12 which would be located within the Killeglan Karst Landscape in the Southern Turbine Cluster. The Killeglan Karst Landscape is a County Geological Heritage Site of National Importance, and Policy NF10.11 of the Roscommon County Development Plan 2022-2028 seeks to preserve and protect sites of county geological importance from inappropriate development where they comprise designated sites or national heritage areas.”

Reason: *To protect the visual integrity and geological heritage of the area.*

Condition No.7 states:

“The following design requirements shall be complied with: -

- (a) The wind turbines shall be as indicated in the plans and particulars submitted with the application.*

- (b) *Details of colouring for the turbines, shall be submitted to, and agreed in writing with, the planning authority prior to the commencement of development.*
- (c) *Cables within the site shall be laid underground.*
- (d) *The wind turbines shall be designed to ensure that the blades rotate in the same direction.*
- (e) *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 amenity.*

- **ABP-321238-24** refers to an Electricity Development Application for approval under Section 182A(1) of the PDA, 2000 (as amended) by the applicant Energia Renewables ROI Limited for a 110Kv electricity substation, approx. 7.5km of underground electricity line and all associated works. This (SID) application was approved with conditions by the Coimisiún on 18th July 2025. It is located approx. 2.2km northeast of the southern turbine cluster and 6.6km east of the northern turbine cluster and provides for an alternative grid connection for the parent development permitted under parent ABP-313750-22.

3.3 Relevant planning history on adjacent or proximate sites:

- **ABP-320869-24** refers to a local authority development application for approval under Section 177AE of the PDA, 2000 (as amended) by Roscommon County Council of an interim flood relief scheme to pump water from Lough Funshinagh and to discharge the water to Cross River, within the townland of Carrick, County Roscommon. This (LA) application was approved with conditions by the Coimisiún on 9th January 2025. It is located approx. 4km east of the northern turbine cluster permitted under parent ABP-313750-22.
- **ABP-322045-25** refers to an Electricity Development Application for approval under Section 182A(I) of the PDA, 2000 (as amended) by TDC Community Solar Park Limited for construction of a 110kV substation facility, electrical connection to the national grid and associated works and services. This (SID) application was approved with conditions by the

Coimisiún on 11th November 2025. It is located approx. 6.5km southeast of the southern turbine cluster permitted under parent ABP-313750-22.

4. Background to the Proposed Alterations

The approved development comprises the installation of wind turbines with defined dimensions and electrical capacity as follows;

- A hub height of 99m
- A rotor diameter of 162m
- An overall tip height of 180m
- Electrical capacity of the project – 102MW

The Planning Statement submitted with the request states that the permitted turbine dimensions correspond to a single turbine model manufactured by a sole turbine supplier (vestas). In order to implement a competitive tendering process between different turbine manufacturers the requester is proposing to alter the dimensions of the permitted turbines to models with different component dimensions.

The requester opines that the proposed alteration is very minor and does not involve materially significant changes to the dimensions of the permitted turbines but is essential to enable a competitive tendering procurement process and to safeguard the viability of the permitted wind energy generation capacity.

5. Scope of Request

5.1 General Overview

The applicant is proposing to alter the dimensions of all of the permitted turbines from a single, pre-specified turbine model to any turbine model whose configuration of hub height, rotor diameter and overall tip height falls within the following range:

	Permitted Dimensions	Proposed Alteration	Percentage Change
Hub Height	99m	98m – 101m	1% (reduction) – 2% (increase)

Rotor Diameter	162m	158m – 163m	2.5% (reduction) – 0.6% (increase)
Tip Height	180m	179m – 180m	0.5% (reduction) – 0% (no change)

The electricity generation capacity will also be dependent on the dimensions and model of wind turbine installed and the proposed alteration will result in a modification to the electrical capacity within the following range:

Permitted Electrical Capacity	Proposed Alteration	Percentage Change
102 MW	94.5MW – 122.4MW	7.4% (reduction) to 20% (increase)

The applicant is not proposing any change to the number of permitted turbines, wind turbine locations or ancillary wind infrastructure. The layout will remain consistent with the permitted development, including the omission of turbines T9, T10 and T12 (Condition No.4 refers).

The alteration proposed will require amendment of Condition No.7.a attached to the parent permission (ABP-313750-22), which stipulates that the wind turbines shall be as indicated in the plans and particulars submitted with the application. I also note the terms of Condition No.1 of the parent permission which stipulates that the development shall be carried out and completed in accordance with the plans and particulars lodged with the application, including the further information received. However, the terms of condition No.1 are qualified by the provision that they apply ‘*except as may otherwise be required in order to comply with the following conditions*’. As Condition No.7.a is such a ‘following condition’, I am of the opinion that its amendment is sufficient to capture the alterations now proposed.

5.2 Precedent

Several similar requests for S.146B amendments to permitted windfarms have been determined by the Commission in relation to blade length, rotor diameter and hub height. The following cases have been highlighted by the applicant:

- **Bracklyn Wind Farm (ABP-311565-21)** – On 7th July 2025 the Commission decided to alter the permitted Bracklyn Wind Farm in County West Meath under Section 146B to provide for an altered range of turbine dimensions. In this case the rotor diameter was proposed to be reduced by up to 4m or increased by up to 1m, while the hub height was proposed to be reduced by up to 5m and the overall tip height was proposed to be reduced by up to 6m. The Commission’s Inspector concluded that:
“I am satisfied that the proposed alteration would not constitute the making of a material alteration to the permitted Bracklyn Wind Farm, subject to consideration of environmental impact and AA as considered in this report. The alteration of the dimensions of the turbines is therefore appropriate. Having regard to the nature and scale of the proposed alterations and the development as granted under ABP-311565-21, I am satisfied that the Board would not have determined the proposal differently had the hub height, rotor blade diameter and tip height now proposed in the alterations formed part of the original application. Therefore, the proposed alteration does not constitute the making of a material alteration of the development as granted under ABP-311565-21”.

- **Cloncreen Wind Farm (ABP-303313-18)** – On 4th April 2019 the Commission decided to alter the permitted Cloncreen Wind Farm in County Offaly under Section 146B to provide for an altered range of turbine dimensions. In this case the rotor diameter was proposed to be increased from between 126m and 131m to 140m (an increase of between 9m and 14m), while the hub height was proposed to be reduced from between 104.5m and 107m to 100m. The Commission’s Inspector concluded that:
“...having fully considered the proposed alterations and the development as granted.....the Board would not have determined the proposal differently had the turbine configuration and blade length now proposed in the alteration formed part of the said application. In that regard, I consider it reasonable to

conclude that the proposal subject of this request does not constitute the making of a material alteration of the development as granted...

- **Yellow River Wind Farm (ABP-307357-20)** – On 14th August 2020 the Commission decided to alter the permitted Yellow River Wind Farm in County Offaly under Section 146B to provide for an altered range of turbine dimensions. In this case the rotor diameter was proposed to be increased from 113m to 126m, while the hub height was to be reduced from 110m to 93m and 110m to 103m. The Commission’s Inspector concluded that:
“.....the Board would not have determined the proposal differently had the turbine configuration and blade length now proposed in the alteration formed part of that application. In that regard, I consider it reasonable to conclude that the proposal subject of this request does not constitute the making of a material alteration of the development as granted permission.....”

- **Meenbog Wind Farm (ABP-303729-19)** – On 5th June 2019 the Commission decided to alter the permitted Meenbog Wind Farm in Co. Donegal under Section 146B to provide for an altered range of turbine dimensions. In this case the rotor diameter of the wind turbines was proposed to be increased from 126m to 136m, while the hub height was to be reduced from 93.5m to 88.5m. The Commission’s Inspector concluded that:
“Having regard to the nature and scale of the proposed alterations and the development as granted.....I am satisfied that the Board would not have determined the proposal differently had the rotor blade diameter now proposed in the alteration formed part of the original application. Therefore, the proposed alteration does not constitute the making of a material alteration of the development as granted....”

- **Drumnahough Wind Farm (ABP-318764-23)** – On April 2024, the Commission decided to alter the permitted Drumnahough Wind Farm in Co. under Section 146B to provide for an altered range of turbine dimensions. In

this case the rotor diameter of the wind turbines was proposed to be reduced by 11.8m or 9m or increased by 5m, while the hub height was to be reduced by 2.5m or 12m or increased by 4.5m with the tip height maintained or reduced by 18m. The Commission's Inspector concluded that:

"I am satisfied that the Board would not have determined the proposal differently had the hub height, rotor blade diameter and blade length now proposed in the alteration under Options A, B or C formed part of the original application. Therefore, the proposed alteration does not constitute the making of a material alteration of the development as granted...."

In addition to the precedent case types identified by the applicant, I also note the recent decision of the Commission in respect of the permitted **Bracklyn Wind Farm (ABP -320537-24)**. On the 10th July 2025 the Commission decided to alter the permitted Bracklyn Wind Farm, Co. Meath under Section 146B to provide for an altered range of turbine dimensions. In that case the rotor diameter of the wind turbines was proposed to be reduced by 4m or increased by 1m (from 162m), while the hub height was to be reduced by 5m or maintained at 104m and the tip height was to be reduced by 6m or maintained at 185m. The Commission's Inspector concluded that:

"I am satisfied that the Board would not have determined the proposal differently had the hub height, rotor blade diameter and tip height now proposed in the alterations formed part of the original application. Therefore, the proposed alteration does not constitute the making of a material alteration of the development as granted under ABP-311565-21".

5.3 Application Documentation

The application is accompanied by:

- **Planning Statement (PS)** which includes:
 - o *Annex 1 & 2 – Drawings of the permitted development and proposed alterations (site location, layout plans and elevations)*

- *Annex 3 - Environmental Impact Assessment Screening Report (EIASR)*
- *Annex 4 - Addendum Natura Impact Statement (ANIS)*
- **Environmental Report (ER)** which includes:
 - *Annex 1 – Addendum to EIA/Biodiversity and Ornithology Chapters*
 - *Annex 2 – Landscape & Visual Impact Assessment (LVIA)*
 - *Annex 3 – Comparative Photomontages*

5.4 Section 146B Planning Statement (PS)

The PS submitted by the Applicant provides the following information:

- Section 1.0 and 2.0 sets out an introduction and the relevant legislative provisions.
- Section 3.0 sets out the rationale for the request which is based on enabling a competitive tendering process as already referenced in Section 4 above.
- Section 4.0 sets out the scope of the proposed alteration. This includes Table 1 which provides a detailed description of the range of alterations sought to the turbine dimensions which is quantified in metric and percentage terms for the hub height, rotor diameter and tip height. Table 2 provides details of the corresponding alterations to electricity generation capacity which ranges from 94.5MW to 122.4MW (relative to that permitted of 102MW) depending on the final turbine model selected.
- Section 5.0 sets out precedent decisions as highlighted by the applicant and as already referenced in Section 5.2 above.
- Section 6.0 sets out the applicants position in respect of materiality and conclusion in respect of EIA screening.
- Section 7.0 sets out the conclusions of the Addendum NIS.
- Section 8.0 sets out the position in terms of compliance with the conditions of (parent) consent.
- Section 9.0. provides a conclusion on the requesters position as follows:

“Having regard to the characteristics of the proposed alteration, the characteristics of the receiving environment, the conclusions of the EIA Screening, the assessment of the Environmental Report, the findings of the Addendum NIS and previous decisions of the Commission for comparable proposed alterations; the requester submits that the proposed alteration does not constitute a material alteration to the permitted development and will not result in any likely significant adverse effects on the environment”.

5.5 Environmental Impact Assessment Screening Report (EIASR)

The applicants EIASR submits that the proposed alteration is not a change or extension referred to in Part 1 and will not give rise to a development of a type listed at Part 1 of Schedule 5 of the Regulations. It is also submitted that the permitted development was subject to EIA and the proposed alteration will not generate or result in a development listed at paragraphs 1-12 of Part 2 of Schedule 5 of the Regulations. On this basis the applicant submits that the proposed alteration does not fall for mandatory assessment under the EIA Directive.

The applicant does however proceed to screen the proposed development as a subthreshold development for the purposes of EIA. Table 1 and 2 of the EIASR refers. In this regard the applicant concludes that the proposed development will not give rise to impacts of a magnitude which, on its own or cumulatively, could cause a likely significant effect on the environment as assessed using the information and evaluation criteria set down at Schedule 7A of the Regulations, 2001 (as amended) and that therefore EIA and submission of an EIAR is not required.

5.6 Environmental Report (ER)

The ER submitted by the Applicant provides the following information:

- Section 1.0 sets out an introduction
- Section 2.0 sets out a description of the proposed alteration
- Section 3.0 sets out a description of the likely effects under the headings of population & human health, biodiversity & ornithology, land, soils & geology,

water, air quality & climate, noise & vibration, landscape & visual, cultural heritage & archaeology, materials assets, roads, traffic, transport & access, aviation, telecommunications, resources & utility infrastructure, interactions of the foregoing, major accidents and natural disasters.

- Section 4.0 sets out the conclusion that the proposed alteration will not result in any likely significant effects on the environment.

6. Public Consultation

In accordance with the consultation procedures set out in Section 146B(2)(b) of the Act submissions were invited on 21st October 2025. One third party submission and one prescribed body submission were received by the deadline of 18th November 2025. In the interests of clarity, a response was not received from the Planning Authority.

6.1 Third Party Submission

Wind Turbine Action Group South Roscommon

A single third-party submission was received from the Wind Turbine Action Group South Roscommon on 18th November 2025.

This is a lengthy submission which raises issues with the assessment and determination of the parent permission ABP-313750-22, procedural issues and issues of materiality. The issues raised are summarised in the Table A below.

Table A: Summary of Issues Raised in Third Party Submission	
Issues Raised: Parent permission ABP-313750-22	
1.	The submission opines that Condition No.1 of the parent permission is ambiguous, unenforceable, imprecise, unreasonable and incapable of being complied with on the basis that it seeks compliance with two separate and distinct plans, those originally submitted with the application, and the further information received on 31/03/2023 and 10/07/23. Specifically, it is submitted that the separate plans include contradictory detail on the turbine base foundations and it is unclear which is to be implemented.
2.	It is submitted that the red line boundary of the submitted application included lands in the north-eastern corner of the southern turbine cluster, registered to a non-participating landowner. Folio RN8790F and RN26518F refer. These lands were later omitted in the revised plans submitted on 31 st March, 2023 and the red line boundary changed. It is submitted that the redline boundary cannot be changed after the submission of the application.

3.	It is submitted that the infrastructure (haul route and underground electrical and communication cabling trench) linking turbines T11 and T13 cross a third party right of way (ROW) of Mr. William Kildea Snr (WKS). WKS is a non-participating landowner and consent was not given. The ROW is established by way of an appurtenant to the lands belonging to WKS, the holding is a working farm and is accessed daily. The permitted development will obstruct and disturb the ROW.
4.	The submission opines that Condition No.18 concerns roads safety matters which are left over to be resolved post consent, including a road safety audit. The submission is of the view that proposed entrance C is a traffic hazard and that visibility splays cannot be achieved to standard and that the road network is not of a standard which can safely facilitate the proposed development. It is submitted that if an RSA had been requested during the assessment of the application, then this would have been identified, and the application could have been refused. Holding such a substantive issue over to the post-consent stage is not in accordance with Development Management Guidelines and infringes on the rights of third parties to fully participate in the decision-making process.
Issues Raised: Procedural	
5.	The submission notes Pre-App ABP-319042-24 and subsequent permission ABP-321328-24 under S.182 for an alternative grid connection for the permitted development. The submission opines that the permitted development has permission for two separate grid connections and that the requester should be instructed by the Commission to submit a further application under S.146B of the Act to alter the parent permission and omit the previously approved grid connection prior to determination of the subject application.
6.	<p>The submission takes issue with the fact that correspondence from Solicitors on behalf of WKS was returned by the Commission 12th November 2025 on the basis that WKS did not make a submission/observation on the application relating to the development and could not therefore be considered. It is submitted that this correspondence was not a submission on ABP-323448-25, but was a correspondence to the Commission in relation to defects in the parent permission as they relate to the property of WKS and should not therefore have been returned without reply.</p> <p>It is further submitted that the proposed alterations will have a material affect on the property rights of WKS and that under S.146B(2)(b) the Commission could have invited submissions from “<i>such person or class of person the Board considers appropriate</i>” and that this should have included WKS.</p>
7.	It is submitted that the Commission is also in receipt of correspondence from Solicitors on behalf of Mr Shane Butler (10 th October 2025) in respect of the parent permission and traffic safety concerns. It is implied that for this reason Mr. Butler should also have been invited to make a submission under S.146B(2)(b) in respect of the proposed alterations by the Commission but was not.
Issues Raised: Materiality	
8.	It is submitted that as the parent development cannot be carried out in accordance with the terms and conditions to which it is subject, Condition No.1 and 18 specifically, that it is difficult therefore to comprehend how an alteration to such a permission could not be material.
9.	It is submitted that the proposed alteration of the permitted turbine rotor diameter by +1m will result in the sweep area of turbine T13 oversailing the property of WKS by at least 500mm without the consent of the landowner. It is submitted that this is a trespass and a material alteration to the terms of the permitted development. The submission does state that the exact amount of over sail is unknown because the property boundary is poorly defined on the ground. It is submitted that without an accurate boundary survey it is not possible to ascertain the exact location of the already approved T13 in relation to the adjoining property boundary and consequently it is not possible to quantify the material alteration which would occur.

10.	It is submitted that the proposed alterations, by virtue of the requirement to transport larger turbine components, may further impact on road safety.
11.	It is submitted that the EIA Screening Report fails to address the oversailing of WKS property, the need for WKS consent in respect of a ROW or the environmental sensitivity of WKS property.
12.	It is submitted that an area of important biodiversity within the property of WKS and known locally as “the rocks”, was not assessed in the original EIAR nor in the EIA Screening Report in respect of the proposed alterations. It is submitted that this area contains large areas of good quality rough/rocky grassland habitat likely to conform to the EU Habitats Directive Annex-listed habitat species-rich calcareous grassland. It is submitted that the proposed alterations cannot be deemed non-material in the absence of consideration of this issue.

6.2. Prescribed Bodies

Transport Infrastructure Ireland (TII)

In a submission dated 30th October 2025 TII advised that its position in relation to the proposed alteration remained as set out in its observations on 6th July 2022 and 17th August 2023 in respect of the parent development. Otherwise TII advised of Department of Transport (DoT) Circulars which issued since the parent permission, and which may be of relevance in the assessment of the current request. These are:

- DoT Circular RW18 of 202 (Exceptional Abnormal Loads), and
- DoT Circular RW07 of 2025 (Interim Guidance)

7. Assessment

7.1 Consideration of Materiality

The first consideration in relation to this request to alter the terms of ABP-313750-22 is to determine if the making of the alteration would constitute the making of a material alteration of the terms of the Seven Hills Wind Farm, Co. Roscommon as approved.

The requester proposes to install a type of turbine that would differ from the turbine type that formed the basis of the EIA and NIS under ABP-313750-22. The requester states that the need for the alteration to the terms of the permission has arisen to enable a competitive tendering process for the supply of the wind turbines. The requester has sought to change the dimensions of the defined turbine approved

under ABP-313750-22, to allow for flexible dimensions as described in Section 5.1 of this report.

7.1.2 Planning Context

The approved Seven Hills Wind Farm and the proposed alterations comply with the following policy:

7.1.2.1 European Policy

- RED III (European Renewable Energy Directive (EU/2023/2413))
- EU Directive 2009/28/EC and Directive 2018/2001/EU (Renewable Energy).
- European Wind Power Action Plan
- REPowerEU Plan 2022
- European Green Deal 2020

7.1.2.2 National & Regional Policy & Guidelines

- National Planning Framework, (First Revision) April 2025 (NPF)
- The National Development Plan, 2021-2030 (NDP)
- Climate Action and Low Carbon Development Act 2015 (as amended)
- Climate Action Plan 2024 (CAP 2024) and Climate Action Plan 2025 (CAP 2025)
- Energy Security in Ireland to 2030, Energy Security Package (Nov 2023)
- National Energy Security Framework, April 2022
- Policy Statement on Security of Electricity Supply, November 2021
- Long-Term Strategy on Greenhouse Gas Emissions Reductions, April 2024
- The National Adaptation Framework; Planning for a Climate Resilient Ireland (June 2024)
- National Energy and Climate Action Plan 2021-2030 (“NECP”)
- National Biodiversity Action Plan (NBAP) 2023-2030
- National Landscape Strategy for Ireland 2015-2025 (NLS)
- Regional Spatial Economic Strategy for the Eastern and Midland Region (RSES) 2019-2031

- The Wind Energy Development Guidelines, Guidelines for Planning Authorities issued by the Department of the Environment, Heritage and Local Government, June 2006 (WEDG, 2006)
- Draft Wind Energy Development Guidelines 2019 (dWEDG,2019)
- The Planning System and Flood Risk Management Guidelines, 2009

7.1.2.3 Local Policy

- County Roscommon Development Plan 2022-2028.

7.1.3. Precedent Cases

I refer the Commission to the precedent cases outlined in Section 5.2 of this Report. The Commission previously considered similar alterations to wind farms in terms of amending the turbine type including hub height, blade length and/or rotor diameter and tip height in those cases. Similar to the current request, an alteration application under Section 146B in Case Ref 318764-23 and 320537-24 proposed 3no. different turbine options to avoid future procurement difficulties for the applicant. For the aforementioned referenced precedent cases, the Commission considered all potential impacts and concluded that the minor alterations would not be deemed material and that the proposed changes in hub height, rotor diameter/blade length and tip height would not give rise to a material change or any increase in potential environmental impact. The alterations were not considered material in terms of the Act.

In terms of similar planning applications for wind farms with a proposed range of dimensions for turbines, I refer to ABP-321285-24 which was approved by the Commission on 11/07/2025.

7.1.4. Original Application

The approved development authorised under **ABP-313750-22** comprises the installation of 17 no. wind turbines with defined dimensions and electrical capacity as follows:

- A hub height of **99m**
- A rotor diameter of **162m**
- An overall tip height of **180m**

- Electrical capacity of the project - **102MW**

Condition No.1 required that the development be varied out in accordance with the plans and particulars lodged with the application, including the further information received, subject to any requirements necessary to comply with other attached conditions.

Condition No.4 required the omission of turbines T9, T10 and T12 (*of the 20no. turbines originally proposed*).

Condition No.7.a required that the wind turbines shall be as indicated in the plans and particulars submitted with the application.

7.1.5. Proposed Alterations

The proposed alterations to the wind turbines will have the following percentage of change in relation to the approved turbines and electricity capacity:

Turbine Component	Permitted Dimensions & Capacity	Proposed Alterations		
		Proposed Range of Dimensions & Capacity	Proposed change to Dimensions & Capacity	Percentage Change to Dimensions & Capacity
Hub Height	99m	98m – 101m	1m reduction – 2m increase	1% reduction – 2% increase
Rotor Diameter	162m	158m – 163m	4m reduction - 1m increase	2.5% reduction – 0.6% increase
Tip Height	180m	179m – 180m	1m reduction – no change	0.5% reduction – 0% (no change)
Electrical Capacity	102MW	94.5MW – 122.4MW	7.5MW reduction – 20.4MW increase	7.4% reduction – 20% increase

The proposed alterations will not require any alterations to the overall site layout, turbine locations, drainage provisions or any associated infrastructure.

7.1.6. Potential for Environmental Impacts (EIA and AA)

I have considered all environmental impacts in Section 7.3 and Form 1 (Pre-Screening) and Form 3 (EIA Screening) as Appendix 1 and 2 to this report respectively. I have concluded based on the alterations proposed that no significant

impacts are predicted on population & human health, biodiversity & ornithology, land, soils & geology, water, air quality & climate, noise & vibration, landscape & visual, cultural heritage & archaeology, materials assets, roads, traffic, transport & access, aviation, telecommunications, resources & utility infrastructure, interactions of the foregoing, major accidents and natural disasters.

The EIA Screening concluded that the proposed alterations do not equal or exceed any class of development within Schedule 5, Part 1 or 2 of the Planning and Development Regulations, 2001 (as amended), and significant sub-threshold impacts are unlikely. See Appendix 1 and 2 of this report.

The Appropriate Assessment (Stage 2) concluded that the proposed alterations, individually or in combination with other plans and projects, will not have a significant negative impact on any European Designated Site. See Appendix 3 and 4 of this report.

7.1.7 Issues Raised in the Submissions

Parent Permission

A concern was raised that Condition No.1 of the parent permission was ambiguous, incapable of being complied with and unenforceable on the basis that it required compliance with separate sets of plans containing conflicting detail (the plans originally submitted with the application and the further information received on 31/03/2023 and 10/07/2023). Specifically, it was submitted that contradictory detail was included in respect of the diameter of the turbine foundations, with the original plans setting out a diameter of 15m and the revised plans 29m. It is submitted that it is not possible to determine whether or not an alteration to a permission which contains such vagaries is material. I do not agree with the submission in this regard. The further information received concerned additional bird survey data and collision risk analysis. It did not give rise to any material changes to the proposed development and did not materially alter the conclusions of the EIAR and NIS. It is clear therefore that the parent development was permitted in accordance with the plans and particulars originally submitted with the application, and the further information received in so far as it concerned additional bird survey data and analysis of collision risk. There is no ambiguity in this regard. In relation to the matter of turbine base foundations, the original plans submitted included a '*proposed*

turbine foundation plan' (DWG.No. 21337-MWP-ZZ-00-DR-C-0104 refers) which clearly shows a base diameter of 29m. The plans submitted with this proposed alteration application are consistent with same, and I am therefore satisfied that no material issue, ambiguity or conflict arises which would restrict further consideration of the alterations proposed on this basis.

In relation to the redline boundary of the site, I am satisfied that the red line boundary of the site as detailed in the subject application (for alterations) is consistent with that detailed in the plans and particulars originally submitted with the parent application. Accordingly, I am satisfied that a material issue which is germane to the assessment of the subject application does not arise in this respect.

Otherwise, the submission seeks to challenge the parent permission on the grounds of legal interest regarding a ROW and traffic safety. I am satisfied that these matters were considered and determined in the assessment of the parent application and that it is not appropriate to revisit same. I am satisfied that the proposed alterations to the proposed turbine dimensions can be severed from these issues and that there are no inter-related material considerations arising.

Procedural Issues

I note that the applicant enjoys the benefit of a separate permission for an alternative grid connection as approved under S.182 application ABP-321238-24. It is submitted that the Commission should instruct the applicant to submit a further application under S.146B to alter the parent permission and omit the original approved grid connection, prior to the determination of the subject application.

Without prejudice to the legitimacy of this request, I note that a separate such application has now been received by the Commission. ACP-324004-26 refers. The potential in-combination and cumulative effects of this separate application have been considered in the assessment of the subject application, and I am satisfied that there is no impediment to the determination of the subject application in advance of same and that no other inter-related considerations arise.

In relation to the matter of submissions, the rights of third parties in respect of an application under S.146B is determined by the position on materiality. In the event that proposed alterations are considered to be a material alteration to the parent permission, then public submissions are invited in accordance with the procedures

set out in S.146B(8)(a) of the Act. In the circumstances of this case, I am satisfied that in the absence of materiality it was in order for the Commission to restrict submissions in accordance with S.146B(2)(a) of the Act to persons and bodies who made a submission in respect of the parent application. The matter of correspondence to the Commission in respect of the parent permission and the handling of same is a separate issue which is not germane to the consideration of this case.

Materiality

I am satisfied, for the reasons given above, that there is no deficit arising in respect of Condition No.1 or No.18 of the parent permission, which would restrict the assessment of the proposed alterations to the turbine dimensions or prohibit a decision that they are not material.

The submission raises a concern that the proposed increase in the permitted rotor diameter of the turbines by +1m will result in the rotor sweep of T13 oversailing the non-participating third-party property of WKS by a minimum of 500mm. It is submitted that this is a trespass without consent and a material issue. In this regard I am of the view that the submission does not establish that a trespass will occur. Indeed, the submission states that the property boundary is poorly defined on the ground and that a survey would be required to establish the relationship of T13 to the property boundary and the extent of any over sail which may occur. In my opinion the rotor sweep from T13 is shown on the submitted plans and particulars as remaining within or on the red line boundary of the site and in this regard the particulars of the application display sufficient legal interest to carry out the development as proposed without trespass. In this regard the application is not materially different to that already permitted, and the potential additional increase of 500mm is a minor tolerance which does not evidence trespass. What remains is a potential lack of clarity and dispute in relation to the property boundary and in this regard the Development Management Guidelines (2007) are clear, that the planning system is not designed to resolve such matters. I also note the provisions of Section 34(13) of the Planning and Development Act, 2000 (as amended). I am satisfied that the proposed alteration is not a material alteration relative to that permitted, does not change the relationship of T13 to third party property as permitted, and that the third

party has recourse to civil relief in respect of any separate property dispute which may arise.

In relation to traffic safety considerations, I am satisfied that this matter was assessed and determined at the stage of the parent application. In this regard I note the conclusions of the Inspector that.... *“there is adequate capacity within the road network to accommodate the additional traffic volumes....the proposed development would, therefore, not result in excessive long-term traffic generation, or give rise to a traffic hazard.”*, and..... *“the proposed delivery arrangements would not give rise to a traffic hazard or endanger the safety of other road users and that any disturbance to local communities along the route would be short term and temporary in nature.”*, and.... *“the vehicular access arrangements would not give rise to a traffic hazard or endanger the safety of other road users.”* I am satisfied that the minor alterations to the turbines proposed, which range from a 2.5% reduction to a 2% increase in turbine components, are not of a scale which would introduce new traffic safety considerations or change the assessments reached in the parent application.

In relation to the consideration of biodiversity within the area of WKS property, I note in the first instance that this area is not a designated national or European site for nature conservation reasons. Notwithstanding same, AA and EIA Screening of this report (Appendices 2, 3 & 4) found that there was no mechanism by which the proposed alteration to the dimensions of the permitted turbines could effect terrestrial habitats, including designated grasslands, water quality, hydrology or hydrogeology. On this basis I am therefore satisfied that the proposed alterations to the permitted turbine dimensions will not affect the grasslands within the WKS property and that no material issues arise in this regard.

Otherwise, notwithstanding the failure of the application documentation to consider the potential issue of oversailing the property of WKS, the ROW of WKS and the biodiversity of WKS lands, I am satisfied that these matters have been considered and addressed in this assessment.

7.18 Finding in respect of Materiality

The main issue is whether or not the proposed turbine configuration comprising of a range of dimensions is materially different compared with that assessed and permitted in the parent development. I consider the proposed alterations as outlined

above, would not represent a significant increase or decrease in hub height, rotor blade diameter or wind turbine tip height from that reviewed in the EIAR and assessed in the EIA and NIS. The overall wind turbine tip height of 180m would not be exceeded by the proposed alteration and it could potentially be reduced by 1m or 0.5% dependent on the final wind turbine model chosen.

Having regard to the limited scale and nature of the alterations proposed in relation to the consented development and precedent cases outlined above, I am satisfied that the alterations will not alter the character of the approved development or give rise to new considerations or environmental effects that were not already considered in the assessment of impacts under ABP-313750-22.

I am satisfied that the proposed alteration would not constitute the making of a material alteration to the permitted Seven Hills Wind Farm, subject to consideration of environmental impact and AA as considered in this report. The alteration of the dimensions of the turbines is therefore appropriate.

Having regard to the nature and scale of the proposed alterations and the development as granted under ABP-313750-22, I am satisfied that the Commission would not have determined the proposal differently had the hub height, rotor blade diameter and tip height now proposed in the alterations formed part of the original application. Therefore, the proposed alterations do not constitute the making of a material alteration of the development as granted under ABP-313750-22.

7.2 Design Flexibility

I am of the view, that the description of the proposed development in the subject application could give rise to a question as to why an application for design flexibility under the relevant legislative provisions was not sought. In this section of the report, I will discuss design flexibility and how, in my opinion this does or does not relate to the current S146B amendment application.

7.2.1 Strategic Infrastructure Development (SID)

In the first instance, the Planning and Development Act, 2000 (as amended) provides for a special planning application process for SID, which allows for an

application for the types and sizes of development set out in the 7th Schedule of the Act, to be made directly to the Commission under Section 37(E) rather than to a local authority. This includes large projects in the energy, transport, environmental and health infrastructure sectors.

The parent permission in this case, ABP-313750-22, relates to a planning application made under the provisions of Section 37(E) of the Act for a wind farm comprising of 20 no. (as proposed) turbines with an output of c.120MW and other related works. In this regard, the parent proposed development was determined to be SID by the Commission based on the criteria defined in Class 1 of the 7th Schedule as follows:

“an installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatts”.

7.2.2 Section 146B (Application for Alterations to SID Permissions)

The current amendment application has been lodged direct to the Commission under Section 146B of the Act, which is a general provision applicable to SID and provides for a request to the Commission to alter the terms of a SID which has already been approved.

In this case the applicant is requesting alterations to ABP-313750-22 and as described above, the alterations effectively seek design flexibility in relation to the size of the wind turbines permitted.

7.2.3 Background to Design Flexibility

The Planning and Development (Amendment) (No.3) Regulations, 2023 providing for design flexibility were commenced in December 2023. They provide that a prospective applicant who wishes to avail of a degree of flexibility in their planning application, may in advance of submitting their application, request a meeting with the Commission for the purpose of receiving an opinion as to whether it is appropriate for an application for permission to be made before certain details of the proposed development are confirmed. Such unconfirmed details, may for example in the case of a wind farm application, include the precise parameters of a wind turbine. The process for an applicant seeking to make an application for design flexibility, including the statutory pre-application process is set out in Section 37CC of the Act.

In the circumstances of this case, the parent permission ABP-313750-22 was lodged on 7th June 2022 and determined on 23rd November 2023. It therefore predates the legislative provisions for design flexibility and it was not open to the applicants to seek design flexibility in respect of the parent permission.

Notwithstanding same, I am also satisfied that it was not open to the requester to seek an application for design flexibility under Section 37CC of the Act in any event. In this regard Article 151 of the 2023 Regulations provides for definitions of applications for the purposes of design flexibility and in relation to SID this means..... “*an application for permission for any development specified in the Seventh Schedule of the Act....*”

In my opinion this refers to ‘de-novo’ applications for SID and development specified in the Seventh Schedule of the Act. The current application is not a ‘de-novo’ application for a SID, and it does not come within the scope of a development specified in the Seventh Schedule of the Act. Therefore, I am satisfied that the applicant could not have sought the requested alterations under the design flexibility legislation.

In this regard I am satisfied that the alteration of a SID application, which was made and determined prior to the legislative provisions for design flexibility, can only be sought under the provisions of Section 146B of the Act.

An application under Section 146B of the Act can only consider whether the alterations would be material or not and as discussed in Section 7 of this report, I consider that the proposed alterations are not material in nature.

7.2.4. Conclusion on Design Flexibility

To conclude, I do not consider that the subject application falls within the definition of ‘*an application for permission for any development specified in the Seventh Schedule of the Act*’ as per the Regulations which would trigger an application under design flexibility for the description of the development proposed in the current application.

Accordingly, I consider the design flexibility sought by the applicant in relation to the turbine designs permitted in 2023, to be acceptable based on the current Section 146B legislation.

7.3 The Potential for Significant Environmental Effects

The applicants Environmental Report (ER) assesses the proposed alterations under the following EIA topics: population & human health, biodiversity & ornithology, land, soils & geology, water, air quality & climate, noise & vibration, landscape & visual, cultural heritage & archaeology, materials assets, roads, traffic, transport & access, aviation, telecommunications, resources & utility infrastructure, interactions of the foregoing, major accidents and natural disasters.

The ER concludes in Section 4.0 that *'the proposed alterations comprise modifications to the dimensions of the permitted wind turbines. This ER has assessed the likelihood of effects on the environment arising from the proposed alteration, with special consideration given to those effects most likely to occur, including effects on biodiversity & ornithology, landscape & visual, noise & vibration, and shadow flicker. In summary, this ER has assessed that the proposed alteration will not result in any likely significant effects on the environment.'*

The assessment of environmental effects in respect of each EIA topic is set out below in Table B:

Table B: Assessment of Environmental Effects
Population and Human Health
<p>The ER finds that the nature and characteristics of the proposed alteration will not sufficiently alter the permitted development such that there will be any perceptible effect on populations trends, employment opportunities, capital investment in the project, expenditure in the local economy, tourism, land use or in terms of major accidents.</p> <p>At construction stage the ER finds that the proposed alteration will not affect construction activities or methodologies at the project site.</p> <p>At operational stage the ER finds that likely effects will be limited to noise and shadow flicker and that respective levels will be determined by the wind turbine type installed. However the ER finds that given the minor scale of the alterations proposed significant changes to the predicted levels of noise and shadow flicker is not likely to occur and the upper thresholds will in any event be controlled by the limits set by the Commission in Condition No.8 and 9 of the parent permission (ABP-313750-22).</p> <p>The ER concludes that the proposed alterations will have no likely effects on population and human health and no likely significant cumulative effect with other existing, permitted or proposed developments.</p> <p>I am satisfied that based on the alterations proposed, that no significant adverse effects are likely to occur.</p>
Biodiversity & Ornithology
<p>The ER states that an ecological assessment was undertaken to examine the likelihood of effects on ecological receptors. The ER finds that as the proposed alteration will not have any effect on</p>

construction activities there are no likely significant effects on habitats, terrestrial mammals, aquatic species or invertebrates.

The assessment therefore focuses on the likely potential effects on bats and birds.

Bats

The ER finds that depending on the final wind turbine model selected the bat mitigation buffers need to be recalculated to meet relevant guidance and the commitments made in the EIAR for the permitted development. In a best-case scenario this would result in a reduction of 5.3m in the bat mitigation buffer required and in a worst-case scenario an increase of 1.8m. The effects of this for loss of linear habitat is the additional removal of 27.94m of linear habitat in a worst-case scenario and 116.98m less removal of linear habitat in a best-case scenario. In either scenario the linear lengths of habitat proposed for re-planting will stay the same at 2,820m, which means the proposed alteration will result in a net gain of 1,103.06m in a worst case scenario and 1,247.98m in a best case scenario relative to that permitted of 1,131.0m.

These minor variances are assessed by the ER as not significant, which finds that the conclusions of Chapter 6 of the parent EIAR remain unchanged as follows.....

“following the implementation of the monitoring and mitigation programme.....there is no potential for significant residual effects on bat species” and “following implementation of mitigation, no potential for significant effects exists at any geographic scale.....the planting of additional hedgerow will serve to enhance the hedgerow habitats within the site due to increased species diversity compared to that to be lost, will benefit wildlife and due to the increase...over that to be lost, will result in a net gain in this habitat within the site”.

The ER concludes that no additional effects are predicted on bats or habitats as a result of the proposed alteration and there are no additional cumulative effects with any other projects or plans predicted beyond those identified for the permitted development of those identified within Table 3 of the ER.

Birds

Please refer to Appendix 3 & 4 and Section 7.4 of this report in respect of appropriate assessment which considers all SCI bird species which are QI's of the relevant European Sites.

The ER finds that depending on the turbine model selected the proposed alteration could result in a change in the dimensions of the rotor diameter, hub height and tip height which could alter the collision risk volume used within the Collision Risk Modelling (CRM). To assess the potential effect on avian populations the CRM was re-modelled using the full range of alternative turbine permutations proposed as part of the proposed alterations. Table 3.1 and Table 3.2 of the Addendum to EIAR Biodiversity and Ornithology Chapters refers. The ER finds that there are no appreciable differences in the modelled collision risk estimates and the resulting effects on populations for the target species considered. For all species modelled the worst-case alternative turbine permutation did not result in any collision risk estimates above those for the permitted development, and in almost all cases, the resulting rate was lower than that permitted. The same being true for the predicted effect on species populations.

The ER therefore finds that the conclusions of Chapter 7 of the parent EIAR is unchanged as follows:

“during operation, the likely potential impact of collision mortality on Eurasian curlew and black-headed gull would be of potentially regionally/county significance, although this is based on a number of precautionary assumptions for both species and the true level of mortality s considered likely to be lower. The likely potential impact of collision mortality on the other species assessed (including qualifying features of designated sites within core foraging ranges up to 15km) would not be significant, based o the results of the CRM, although some mortality is likely to occur. Post consent monitoring will be undertaken to identify any unforeseen significant adverse effects in order to be able to undertake appropriate remedial action if required.”

The ER concludes that no additional effects are predicted on birds as a result of the proposed alteration and there are no additional cumulative effects with any other projects or plans predicted beyond those identified for the permitted development of those identified within Table 3 of the ER.

I have considered the applicants environmental and ecological assessments and I am satisfied that all issues have been appropriately assessed and no significant adverse effects are likely to occur in relation to biodiversity as a result of the proposed alterations.

Land, Soils & Geology

At construction stage the ER finds that the proposed alteration will not affect construction activities or methodologies at the project site. It is assessed that the proposed alteration has no interaction with land, soil or geological receptors and therefore no significant effects are likely to occur including cumulative effects.

I am satisfied that based on the alterations proposed, that no significant adverse effects are likely to occur.

Water

At construction stage the ER finds that the proposed alteration will not affect construction activities or methodologies at the project site. It is assessed that the proposed alteration has no interaction with water or the hydrological or hydrogeological environment and therefore no significant effects are likely to occur including cumulative effects.

I am satisfied that based on the alterations proposed, that no significant adverse effects are likely to occur.

Air Quality & Climate

At construction stage the ER finds that the proposed alteration will not affect construction activities or methodologies at the project site, therefore it is assessed that no significant effects are likely to occur at construction stage.

At operational stage, the ER finds that depending on the final wind turbine type installed it is possible that the electrical capacity of the permitted development may be altered from 102MW within the range of 94.5MW to 122.4MW. This may have an effect on the volume of renewable electricity being generated and in turn the abatement of greenhouse gases and improvement of air quality. It is assessed however that in the context of the permitted development the effect of the change on electrical capacity, either increased or decreased, is not likely to have a significant effect on air quality and climate.

I am satisfied that based on the alterations proposed, that no significant adverse effects are likely to occur.

Noise & Vibration

At construction stage the ER finds that the proposed alteration will not affect construction activities or methodologies at the project site, therefore it is assessed that no significant effects are likely to occur at construction stage.

At operational phase the ER finds that, dependent on final wind turbine model installed, it is likely that noise levels experienced at residential dwellings will differ immaterially from those set out at Appendix 11-5 (Volume 2) of the EIAR for the permitted development. The ER finds that given the minor nature of the proposed changes to the dimensions of the wind turbines, and the sound power levels of the wind turbine options which could be installed, a significant effect or significant change in predicted noise levels at residential dwellings, is not likely to occur. In this regard the ER states that the development once operation will remain below the noise limits prescribed by the Commission in Condition No.8 of the permitted development and that all wind turbine types which may be installed can comply with these limits.

The ER finds that the proposed alteration is not likely to give rise to significant vibration effects, will not result in a likely significant effect due to noise and vibration, either individually or in combination with other existing, permitted or proposed developments.

I am satisfied that based on the alterations proposed, that no significant adverse effects are likely to occur.

Landscape & Visual

Annex 2 of the ER contains a Landscape & Visual Impact Assessment (LVIA) which is supported by updated photomontages in Annex 3.

The original LVIA was based on a turbine height of 99m, a rotor diameter of 162m and a tip height of 180m. The photomontages depict three alternative wind turbine scenarios together with the permitted development, selected to illustrate the degree of visual change which is likely to be experienced as a consequence of the proposed alterations. The 3no. configurations are as follows:

- Alternative scenario 1 – 101m hub height, 158m rotor diameter, 180m tip height
- Alternative scenario 2 – 98m hub height, 163m rotor diameter, 179.5m tip height
- Alternative scenario 3 – 99m hub height, 160m rotor diameter, 179m tip height.

To assess the effects of the proposed alterations, 5 no. viewpoints were all selected in the immediate vicinity, as beyond this distance the proposed variation in the turbine dimensions is assessed as likely to be imperceptible.

- At VP4, Dysart Village, 1.6km south-west of the nearest turbine. The ER finds a relatively subtle difference in the perceived scale of the three alternative turbine scenarios which is assessed as not introducing contrasting visual effects to those previously assessed as medium sensitivity and moderate effect.
- At VP11 on the R357 approx. 1km north-west of the nearest turbine. The ER finds as above for VP4 with the additional assessment that even at this near distance the scale differential is imperceptible. This is assessed as not introducing contrasting visual effects to those previously assessed as medium sensitivity and moderate effect.
- At VP12 on the R357 approx. 1.1km south-west of the nearest turbine. The ER finds that there is no discernible difference between the three differing turbine dimensions across the three scenarios modelled. The ER further notes that even with regard to the turbine with the highest hub height (101m) there is very little discernible difference aside of the hub siting marginally higher along the vegetated skyline which the casual observer is unlikely to notice. This is assessed as not introducing contrasting visual effects to those previously assessed as high sensitivity and moderate effect. *(It should be noted that this is a sensitive landscape from which T9, T10 and T12 were omitted by condition of the parent permission.)*
- At VP16 on the R363 approx. 1.8km north of the nearest turbine. The ER finds as above that there is no discernible difference between the differing turbine dimensions across the three scenarios modelled or when viewed with the permitted turbines. This is assessed as not introducing contrasting visual effects to those previously assessed as high sensitivity and significant effect. The ER finds that the residual significance will remain unchanged.
- At VP18 on a local road at Skyvalley approx. 850m south of the nearest turbine. The ER finds that even at this close distance the proposed turbines appear similar across the three alternative scenarios and therefore the residual significance will remain unchanged.

The ER concludes that *'overall, it is assessed that the proposed alterations will not result in any discernible difference in the perceived scale and intensity of the permitted development from surrounding receptors. Thus, it is assessed that the proposed alteration will not give rise to significant landscape or visual effects and will result in no changes to the effects previously assessed with respect to the permitted Seven Hills Wind Farm development.'*

I note that the Roscommon County Development Plan 2022-2028, which the approved development was assessed under, is still the relevant Development Plan.

I have assessed and compared the 5no. updated viewpoints and I am satisfied that the findings of the updated LVIA are accurate. I consider that there is no material change to visual impacts and no noticeable increased effect in physical landscape elements or the overall character of the landscape in comparison to the authorised turbines.

I am satisfied that based on the alterations proposed, that no significant adverse effects are likely to occur.

Cultural Heritage & Archaeology
<p>At construction stage the ER finds that the proposed alteration will not affect construction activities or methodologies at the project site. It is assessed that the proposed alteration has no interaction with archaeological, architectural or cultural heritage features and therefore no significant effects are likely to occur including cumulative effects.</p> <p>At operational stage the ER finds that effects are likely to be limited to visual effects but based on the findings above it is assessed that significant visual effects on archaeological, architectural and cultural heritage features will not occur, including in combination with other existing, permitted or proposed developments.</p> <p>I am satisfied that based on the alterations proposed, that no significant adverse effects are likely to occur.</p>
Roads, Traffic, Transport & Access
<p>At construction stage the ER finds that the proposed alteration will not have a likely effect on the volume of construction traffic generated. The likely turbine delivery route has been assessed and found to be capable of accommodating the delivery of wind turbine components which fall within the dimension ranges proposed. It is therefore assessed that the proposed alteration is not likely to have a significant direct, indirect or cumulative effect on transport and access during the construction phase.</p> <p>At operation phase, the ER finds that the proposed alteration will have no effect on traffic generated and overall that the proposed alterations will not result in any likely significant effects on transport and access during the construction or operational phase, either individually or in combination with other existing, permitted or proposed developments.</p> <p>I am satisfied that based on the alterations proposed, that no significant adverse effects are likely to occur.</p>
Aviation
<p>The ER finds that as the proposed alteration will not result in an increase in the overall tip height of the permitted wind turbines, significant effects on aviation are not likely to occur.</p> <p>I am satisfied that based on the alterations proposed, that no significant adverse effects are likely to occur.</p>
Telecommunications
<p>The ER finds that given the scale of the proposed alterations and the absence of telecommunications infrastructure or services passing through the permitted development site (as confirmed by multiple service providers at Appendix 2-16 (Volume 3) of the parent EIAR), it is assessed that the proposed alterations is not likely to have a significant effect on telecommunications.</p> <p>I am satisfied that based on the alterations proposed, that no significant adverse effects are likely to occur.</p>
Resource & Utility Infrastructure
<p>The ER finds that as the proposed alteration relates solely to the dimensions of wind turbine components, no significant effects on resources or utility infrastructure is likely to occur.</p> <p>I am satisfied that based on the alterations proposed, that no significant adverse effects are likely to occur.</p>
Interactions of the Foregoing
<p>The ER states that all potential interactions have been assessed in the foregoing sections and finds that the proposed alteration will have no likely significant effect on the environment.</p> <p>I am satisfied that interactions have been adequately assessed, and having regard to the minor nature of the alterations proposed and the absence of likely significant effects under each EIAR topic, that significant effects as a result of interactions of the foregoing are unlikely to occur.</p>

Major Accidents & Natural Disasters
The ER finds that as the proposed alterations relates solely to the dimensions of wind turbine components; there will be no likely significant effect on major accidents and natural disasters. I am satisfied that based on the alterations proposed, that no significant adverse effects are likely to occur.

The proposed alterations have been subject to preliminary examination and screening for environmental impact assessment. (Refer to Form 1 and Form 3 in the Appendices to this report).

Having regard to: -

- The parent permission granted under ABP-313750-22 and the conditions to which it is subject,
- The minor nature and scale of the proposed alterations which can be constructed in accordance with the permitted construction works, methodologies and related activities,
- The location of the proposed alterations within the footprint of the permitted development site and the absence of change to the permitted development layout,
- The pattern of development in the surrounding area,
- The criteria set out in Schedule 7 of the Planning and Development Regulations, 2001 (as amended),
- The location of the development outside of any sensitive location specified in Article 109(4)(a) of the Planning and Development Regulations, 2001 (as amended), and
- The Guidance set out in the 'Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding sub-threshold development' issued by the Department of the Environment, Heritage and Local Government (2003),

It was concluded that the proposed development would not be likely to have significant effects on the environment, and that an environmental impact assessment report is not required.

7.4 Appropriate Assessment

The parent permission for the subject development, ABP-313750-22, was subject to Appropriate Assessment (Stage 2) which concluded that the proposed development would not adversely affect the integrity of European Sites in view of the site's Conservation Objectives and there is no reasonable scientific doubt as to the absence of such effects.

Appendix 3 and 4 of this report examines the potential for effects on the integrity of European sites by virtue of the proposed alterations, alone and in combination with other plans and projects, including the permitted development. The requirements of Article 6(3) as related to appropriate assessment of a project under Part XAB, section 177U of the Planning and Development Act, 2000 (as amended) are, therefore, fully considered the respective appendices and the conclusions set out in this section in respect of the proposed alterations.

7.4.1 Screening Determination

Finding of likely significant effects

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that it is not possible to exclude that the proposed development alone will give rise to significant effects as a result of avian collision risk on Four Roads Turlough SPA (004140), Lough Croan Turlough SPA (004139), River Suck Callows SPA (004097), Lough Ree SPA (004064) and Middle Shannon Callows SPA (004096) European Site(s) in view of the sites conservation objectives and a number of qualifying interests of those sites.

It is therefore determined that Appropriate Assessment (Stage 2) [Under Section 177V of the Planning and Development Act, 2000 (as amended)] is required.

7.4.2 Appropriate Assessment Conclusion: Integrity Test

In screening the need for Appropriate Assessment (Appendix 3 refers), it was determined that the proposed development could result in significant effects on the Four Roads Turlough SPA (004140), Lough Croan Turlough SPA (004139), River Suck Callows SPA (004097), Lough Ree SPA (004064) and Middle Shannon Callows

SPA (004096) in view of the conservation objectives of those sites and that Appropriate Assessment under the provisions of S177V was required.

Following an examination, analysis and evaluation of the ANIS, all associated material submitted and taking into account the observations received (Appendix 4 refers), I consider that adverse effects on site integrity of the Four Roads Turlough SPA (004140), Lough Croan Turlough SPA (004139), River Suck Callows SPA (004097), Lough Ree SPA (004064) and Middle Shannon Callows SPA (004096) can be excluded in view of the conservation objectives of these sites and that no reasonable scientific doubt remains as to the absence of such effects.

My conclusion is based on the following:

- The minor nature and character of the proposed alterations to the dimensions of the permitted turbines,
- The results of the collision risk re-modelling which predicts no change or a small reduction in collisions per year and the predicted morality rate relative to background mortality in both a best- and worst-case scenario for the range of alternative turbine permutations proposed,
- The absence of any change to the construction or work-related activities and associated methodologies,
- The site-specific conservation objectives, targets, attributes, QI's and SCI's of the respective European Sites as detailed and assessed in my Stage 2 AA as appended to this report (Appendix 4)
- The proposed development will not affect the attainment of conservation objectives for the Four Roads Turlough SPA (004140), Lough Croan Turlough SPA (004139), River Suck Callows SPA (004097), Lough Ree SPA (004064) and Middle Shannon Callows SPA (004096) or prevent or delay the restoration of favourable conservation condition for Golden Plover, Greenland White-fronted Goose, Whooper Swan, Lapwing, & Wigeon
- The effectiveness of the suite of mitigation measures set out in the parent permitted development ABP-313750-22 which will be implemented in full.

8. Conditions of the Permission

8.1 Amendment of Condition No.7.a

Notwithstanding my opinion above that the proposed alteration does not constitute the making of a material alteration, I consider that an amendment to the wording of Condition No.7.a is required to ensure that if permission is granted in respect of the current application, then the overall project could be completed in compliance with Condition No.7.a of the 2023 approval, which this application seeks to amend.

I consider that the wording of Condition No.7.a and the reason given there for, needs to be altered so that it would read as set out below:

- **Condition No.7.a:** The wind turbines shall have a hub height ranging from 98 metres to 101 metres, a rotor blade diameter ranging from 158 metres to 163 metres and blades that result in an overall tip height ranging from 179 metres to 180 metres, in accordance with the range of turbine options assessed in the application documentation. Prior to the commencement of development, the developer shall submit to the planning authority a drawing of the final turbine design to be kept on file as part of the public record.

Condition No.7.b – e (inclusive) – unchanged.

Reason: In the interests of visual amenity, clarity and the proper planning and sustainable development of the area.

9. Recommendation

I recommend that the Commission decides that (a) the making of the alterations subject of this request do not constitute the making of a material alteration of the terms of the development as approved under ABP 313750-22, and (b) the proposed modifications will not give rise to significant environmental effects or significant effects on the integrity of any European site, for the reasons stated below.

DRAFT ORDER

REQUEST received by An Coimisiun Pleanála on the 19th day of August 2025 from Energia Renewables ROI Limited under section 146B of the Planning and

Development Act, 2000, as amended, to alter the terms of a strategic infrastructure development, granted under ABP-313750-22 for a Wind farm development of 20no. turbines (17no. permitted) and all associated works located in Turrock, Cronin, Gortaphuill, Glenrevagh, Tullyneeny, Bredagh, Cuilleenirwan, Cuilleenoolagh, Curry, Miltown, Tobermacloughin, Skeavally, Boleyduff, Clooncaltry, Feacle, Cam, Tawnagh and other townlands in County Roscommon.

WHEREAS the Commission made a decision to grant the proposed development, subject to conditions, for the above-mentioned development by order dated the 23rd day of November, 2023.

AND WHEREAS the proposed alteration is described as follows:

- The alteration of the permitted hub height from 99m to between 98m and 101m,
- The alteration of the permitted rotor diameter from 162m to between 158m and 163m,
- The alteration of the permitted overall tip height from 180m to between 179m and 180m,
- The applicant is proposing to install any wind turbine model whose configuration falls within the ranges specified above,
- The Electrical capacity of the project is dependent on the wind turbine model installed and may alter the permitted output from 102MW to between 94.5MW and 122.4MW.

PROPOSED ALTERATIONS consist of the amendment of the wording of Condition No.7.a, so that the condition reads as follows:

Condition No.7.a: The wind turbines shall have a hub height ranging from 98 metres to 101 metres, a rotor blade diameter ranging from 158 metres to 163 metres and blades that result in an overall tip height ranging from 179 metres to 180 metres, in accordance with the range of turbine options assessed in the application documentation. Prior to the commencement of development,

the developer shall submit to the planning authority a drawing of the final turbine design to be kept on file as part of the public record.

Reason: In the interests of visual amenity, clarity and the proper planning and sustainable development of the area.

AND WHEREAS having regard to the issues involved, the Commission decided, in accordance with section 146B(2)(b) of the Planning and Development Act 2000, as amended, to invite submissions by such person or class of person the Commission considers appropriate in relation to the matter,

AND WHEREAS the Commission decided, in accordance with section 146B(3)(a) of the Planning and Development Act 2000, as amended, that the proposed alterations would not result in the making of a material alteration to the terms of the development, the subject of the approval,

AND WHEREAS having considered all of the documents on file and the Inspector's report, the Commission considered that the making of the proposed alteration would not be likely to have significant effects on the environment or on any European Site,

NOW THEREFORE in accordance with section 146B(3)(a) of the Planning and Development Act, 2000, as amended, the Commission hereby alters the abovementioned decision so that the approved development shall be altered in accordance with the plans and particulars received by An Coimisiun Pleanála on the 19th day of August 2025, for the reasons and considerations set out below.

REASONS AND CONSIDERATIONS

In coming to its decision, the Commission had regard to the following:

- (a) The nature and scale of the proposed alteration,
- (b) The documentation on file

- (c) The submissions on file, and
- (d) The report of the Inspector.

Having regard to:

- The nature and scale of the wind farm development permitted under ABP-313750-22;
- The examination of the environmental impact, including in relation to European Sites, carried out in the course of that application;
- The limited nature and scale of the alterations when considered in relation to the overall permitted development;
- The location of the proposed alterations, within the footprint of the permitted Seven Hills Windfarm site;
- The absence of any significant new or additional environmental impacts arising as a result of the proposed alterations; and
- The report of the Commission's Inspector, which is adopted,

The Commission was satisfied that the information before it was adequate to undertake a Stage 1 screening for appropriate assessment and a screening for environmental impact assessment in respect of the proposed alteration.

Appropriate Assessment: Stage 1

In conducting a screening exercise for appropriate assessment, the Commission considered the nature, scale and context of the proposed alterations, the documentation on file including the Addendum Natura Impact Statement submitted with the application and the assessment of the Inspector in relation to the potential for effects on European Sites. In undertaking the screening exercise, the Commission accepted the analysis and conclusions of the Inspector.

The Commission concluded that, both by itself, and in combinations with other development in the vicinity, the proposed alterations would not be likely to have significant effects on four number European Sites in view of their conservation objectives.

The Commission considered that the Ballynamona Bog and Corkip Lough Special Area of Conservation (Site Code: 002339), the Killeglan Grassland Special Area of Conservation (Site Code: 002214), the Four Roads Turlough Special Area of Conservation (Site Code: 001637) and the River Shannon Callows Special Area of Conservation (Site Code: 000216) could be screened out from further assessment and that the Four Roads Turlough Special Protection Area (Site Code: 004140), the Lough Croan Turlough Special Protection Area (Site Code: 004139), the River Suck Callows Special Protection Area (Site Code: 004097), the Lough Ree Special Protection Area (Site Code: 004064) and the Middle Shannon Callows Special Protection Area (Site Code: 004096) required further investigation.

In reaching this conclusion, the Commission took no account of mitigation measures intending to avoid or reduce the potentially harmful effects of the development on any European site.

Appropriate Assessment: Stage 2

The Commission considered the Addendum Natura Impact Statement and all other relevant documentation on file and carried out an appropriate assessment of the implications of the proposed alterations for the Four Roads Turlough Special Protection Area (Site Code: 004140), the Lough Croan Turlough Special Protection Area (Site Code: 004139), the River Suck Callows Special Protection Area (Site Code: 004097), the Lough Ree Special Protection Area (Site Code: 004064) and the Middle Shannon Callows Special Protection Area (Site Code: 004096).

The Commission considered that the information before it was adequate to allow the carrying out of an appropriate assessment, as well as the report of the Inspector.

In completing the assessment, the Commission considered the likely direct and indirect impacts arising from the proposed development, both individually and in combination with other plans or projects, the mitigation measures which are included as part of the approved Seven Hills Wind Farm granted under ABP-313750-22, and the conservation objectives for the European sites.

In completing the Appropriate Assessment, the Commission accepted and adopted the Appropriate Assessment carried out in the Inspector's report in respect of the potential effects of the proposed development on the aforementioned European Sites, having regard to the Sites conservation objectives.

In overall conclusions, the Commission was satisfied that the proposed development would not significantly affect the integrity of the Four Roads Turlough Special Protection Area (Site Code: 004140), the Lough Croan Turlough Special Protection Area (Site Code: 004139), the River Suck Callows Special Protection Area (Site Code: 004097), the Lough Ree Special Protection Area (Site Code: 004064) and the Middle Shannon Callows Special Protection Area (Site Code: 004096) in view of the sites conservation objectives.

Environmental Impact Assessment Screening

The Commission considered the potential environmental impacts that might arise due to the proposed alteration, both by itself and in combination with other development in the vicinity. Having regard to the characteristics of the receiving environment, the characteristics of the proposed alteration, and the submissions on file, the Commission is satisfied that the proposed alteration would not be likely to have significant effects on the environment. The Commission concurred with the analysis and conclusions of the Inspector in this matter. The Commission, therefore, concluded that the preparation of an environmental impact assessment report is not required, either by means of any mandatory requirement or following sub-threshold analysis.

Having regard to: -

- The parent permission granted under ABP-313750-22 and the conditions to which it is subject,
- The minor nature and scale of the proposed alterations which can be constructed in accordance with the permitted construction works, methodologies and related activities,
- The location of the proposed alterations within the footprint of the permitted development site and the absence of change to the permitted development layout,
- The pattern of development in the surrounding area,
- The criteria set out in Schedule 7 of the Planning and Development Regulations, 2001 (as amended),

- The location of the development outside of any sensitive location specified in Article 109(4)(a) of the Planning and Development Regulations, 2001 (as amended), and
- The Guidance set out in the 'Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding sub-threshold development' issued by the Department of the Environment, Heritage and Local Government (2003),

It is considered that, following the EIA Screening Determination, the proposed development would not be likely to have significant effects on the environment and that the preparation and submission of an environmental impact assessment report would not, therefore, be required.

Proper Planning and Sustainable Development

Having regard to:

- the nature, scale and details of the wind farm development permitted under ABP-313750-22,
- the examination of the environmental impact, including in relation to Natura 2000 sites, carried out in the course of that application,
- the limited nature and scale of the alterations when considered in relation to the overall permitted development,
- the location of the proposed alterations, within the footprint of the permitted development site,
- the absence of any significant new or additional environmental impacts arising as a result of the proposed alterations, and
- the report of the Commission's inspector, which is adopted,

It is considered that the proposed alterations would not be material. In accordance with section 146B(3)(a) of the Planning & Development Act, as amended, the Commission hereby makes the said alterations.

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

Paul Kelly

Senior Planning Inspector

9th February 2026

Appendix 1 Form 1 - EIA Pre-Screening

Case Reference	ACP-323449-25
Proposed Development Summary	Request to alter the already permitted wind farm and associated development (ABP-313750-22)
Development Address	Located in Turrock, Cronin, Gortnaphuill, Glenrevagh, Tullyneeny, Bredagh, Cuilleenirwan, Cuilleenoolagh, Curry, Miltown, Tobermacloughin, Skeavally, Boleyduff, Clooncaltry, Feacle, Cam, Tawnagh and other townlands in County Roscommon.
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2.
	<input type="checkbox"/> No, No further action required.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
<input type="checkbox"/> Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	State the Class here
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	

<input type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
<input checked="" type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	Schedule 5, Class 13(a) (Part 2): ‘Any change or extension of development already authorised, executed or in the process of being executed (not being a change or extension referred to in Part 1) which would:- (i) result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this schedule, and (ii) result in an increase in size greater than – - 25 per cent, or - An amount equal to 50 per cent of the appropriate threshold which is the greater’.

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input checked="" type="checkbox"/>	Screening Determination required (Complete Form 3)
No <input type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ **Date:** _____

Appendix 2 Form 3 - EIA Screening Determination Form

A. CASE DETAILS		
An Coimisiun Pleanála Case Reference	ACP-323449-25	
Development Summary	<p>Alteration request in accordance with Section 146B regarding the permitted Seven Hills Wind Farm (ABP-313750-22). Alterations proposed:</p> <ul style="list-style-type: none"> The alteration of all wind turbine hub heights from 99m to between 98m and 101m; The alteration of all wind turbine rotor diameters from 162m to between 158m and 163m; The alteration of all wind turbine overall tip heights from 180m to between 179m and 180m. This will result in an alteration to the electrical capacity of the project from 102MW to between 94.5MW and 122MW. 	
	Yes / No / N/A	Comment (if relevant)
1. Was a Screening Determination carried out by the PA?	N/A	This application was made directly to the Commission under Section 146B of the Act.
2. Has Schedule 7A information been submitted?	Yes	An Environmental Impact Assessment Screening Report has been submitted with the application. This contains Schedule 7A information.
3. Has an AA screening report or NIS been submitted?	Yes	An Addendum NIS was submitted with the application.
4. Is a IED/ IPC or Waste Licence (or review of licence) required from the EPA? If YES has the EPA commented on the need for an EIAR?	No	

<p>5. Have any other relevant assessments of the effects on the environment which have a significant bearing on the project been carried out pursuant to other relevant Directives – for example SEA</p>	<p>No</p>		
<p>B. EXAMINATION</p>	<p>Yes/ No/ Uncertain</p>	<p>Briefly describe the nature and extent and Mitigation Measures (where relevant)</p> <p>(having regard to the probability, magnitude (including population size affected), complexity, duration, frequency, intensity, and reversibility of impact)</p> <p>Mitigation measures –Where relevant specify features or measures proposed by the applicant to avoid or prevent a significant effect.</p>	<p>Is this likely to result in significant effects on the environment?</p> <p>Yes/ No/ Uncertain</p>
<p>This screening examination should be read with, and in light of, the rest of the Inspector’s Report attached herewith</p>			
<p>1. Characteristics of proposed development (including demolition, construction, operation, or decommissioning)</p>			
<p>1.1 Is the project significantly different in character or scale to the existing surrounding or environment?</p>	<p>No.</p>	<p>The proposed project consists of alterations to a permitted wind farm. The alterations are considered to be minor in nature and have been assessed as not material. They consist of alterations to the dimensions of the permitted turbine within a range of percentage changes from a reduction of 2.5% to an increase of + 2%, with the percentage change to the overall tip height consisting of a 0.5% reduction or no change. The proposed alterations do not require the re-siting or relocation of any of the wind turbines or ancillary infrastructure as assessed in the EIAR and approved under the parent permission. Construction phase activities will be</p>	<p>No.</p>

		identical to those approved under the permitted development. No likely significant impacts are predicted.	
1.2 Will construction, operation, decommissioning or demolition works cause physical changes to the locality (topography, land use, waterbodies)?	No.	There will be physical changes to the environment with the construction of the permitted Seven Hills Wind Farm, particularly at operational stage with the insertion of turbines into a rural setting. However, this was assessed as acceptable in the EIA of the permitted development with the location and siting deemed to assist in assimilating the works into the landscape. The proposed alterations are minor in nature with no change or only 0.5% change to the overall turbine tip height and if built in accordance with the EIAR and documentation submitted with the original application will have no likely significant physical changes to the locality or significant effect on the environment.	No.
1.3 Will construction or operation of the project use natural resources such as land, soil, water, materials/minerals or energy, especially resources which are non-renewable or in short supply?	No.	The proposed alterations to the permitted turbine dimensions, and resultant change to the electrical capacity of the permitted development will not result in significant effects on natural resources. All construction works and related activities will be identical to those of the permitted development and if carried out in accordance with the original EIAR, including the Construction and Environmental Management Plan (CEMP) and Drainage Management Plan (DMP) will have no likely significant effect on natural resources or the environment.	No.
1.4 Will the project involve the use, storage, transport, handling or production of substance which would be harmful to human health or the environment?	No.	The proposed alterations relate to the permitted turbine dimensions, and resultant change to the electrical capacity of the permitted development. All construction works and related activities will be identical to those of the permitted development. If	No.

		implemented in accordance with the original EIAR and application documentation, including the CEMP and the specific mitigation measures for dust, there will be no likely significant effect on human health or the environment. Shadow Flicker and Noise will be controlled by the limits and conditions of the parent permission irrespective of the alterations proposed or final turbine model selected.	
1.5 Will the project produce solid waste, release pollutants or any hazardous / toxic / noxious substances?	No.	The proposed minor alterations will not result in the production of solid waste, or the release of pollutants or any hazardous/toxic/noxious substances either by itself or as an alteration to the permitted development. There will be no significant effect on the environment from the generation or production of emissions or waste.	No.
1.6 Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	No.	The EIA of the permitted development assessed that the risk of pollution to ground and surface waters would be mitigated by the implementation of measures set out in the EIAR, DMP and CEMP. The proposed minor alterations consist of identical construction related activities to those of the permitted development and if built in accordance with the EIAR and documentation submitted with the original application will have no significant effect on the environment.	No.
1.7 Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	No.	The EIA of the permitted development assessed that noise and vibration effects during all phases would be avoided by the implementation of the measures set out in the EIAR and CEMP. Construction related activities will be identical to those of the permitted development. Noise limits are controlled by Condition No.8 of the permitted development (ABP-313750-22) which will ensure that noise levels do not exceed the prescribed	No.

		limits at noise sensitive receptors during the operational phase regardless of final turbine design. There will be no significant effects on the environment.	
1.8 Will there be any risks to human health, for example due to water contamination or air pollution?	No.	All construction works and related activities will be identical to those of the permitted development. If implemented in accordance with the original EIAR and application documentation, including the CEMP and the specific mitigation measures for dust, the DMP and measures for the protection of water quality there will be no likely significant effect on human health or the environment.	No.
1.9 Will there be any risk of major accidents that could affect human health or the environment?	No.	Due to the minor nature of the proposed alterations which will not change the nature of the construction works or related activities of the permitted development, it is not considered that a risk of major accidents arises. If implemented in accordance with the original EIAR and application documentation, including the CEMP and best practice construction methodologies it is considered there will be no likely significant effect on human health or the environment.	No.
1.10 Will the project affect the social environment (population, employment)	No.	Construction and operational phase activities will be identical to those of the permitted development. No likely significant effects on the social environment are predicted at any phase of the proposed development as a result of the proposed minor alterations.	No.
1.11 Is the project part of a wider large scale change that could result in cumulative effects on the environment?	No.	The proposed alterations will be constructed concurrently with the permitted Seven Hills Wind Farm, however no cumulative impacts are expected due to the minor nature of the alterations. The EIA of the permitted development noted several existing and permitted plans and projects within a 20km radius of the proposed	No.

		development but assessed that any in-combination effects could be avoided, managed and mitigated by the measures which form part of the proposed development as described in the EIAR and NIS and recommended planning conditions. I am satisfied that the minor scale of the proposed alterations would not result in appreciable cumulative impacts beyond that assessed in the permitted development or which would result in significant effects on the environment.	
2. Location of proposed development			
<p>2.1 Is the proposed development located on, in, adjoining or have the potential to impact on any of the following:</p> <ul style="list-style-type: none"> - European site (SAC/ SPA/ pSAC/ pSPA) - NHA/ pNHA - Designated Nature Reserve - Designated refuge for flora or fauna - Place, site or feature of ecological interest, the preservation/conservation/ protection of which is an objective of a development plan/ LAP/ draft plan or variation of a plan 	No.	<p>The project is not located in, on, or adjoining any European site, designated or proposed NHA, or any other listed area of ecological interest or protection. It consists primary of grasslands as described in the parent EIAR.</p> <p>Accordingly, having regard to the minor nature of the alterations proposed I do not consider that the location of the project is likely to result in a significant effect on the environment.</p>	No.
<p>2.2 Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, for example: for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?</p>	No.	<p>The site is not under any wildlife or conservation designation as stated above. An addendum NIS and EIAR Biodiversity and Ornithology Chapter accompanies the subject alteration application. I note the conclusion of the applicants AA Screening Report which concludes that the proposed alterations will not affect the previously described pathways for impacts on European sites nor will it introduce any additional pathways for impacts to occur. I also note the conclusions of the Addendum NIS which finds that the</p>	No.

proposed alterations present no mechanism by which any likely significant effects could occur on any European site beyond those assessed in the parent application NIS. Specifically, I note the conclusions of the Addendum to the EIAR which considers the Biodiversity and Ornithology chapters in the context of avian collision risk and bat mitigation buffers. In terms of collision risk, for all species modelled the worst-case scenario did not result in any collision estimates above those for the permitted development and in almost all cases, the resulting rate of collisions was lower. The same was true for the predicted effect on species populations. In terms of bat mitigation measures, in a worst-case scenario the proposed alteration could result in more vegetation loss above and beyond what was permitted in the parent permission, but this is a marginal additional loss of 27.94m. In a best-case scenario, there will be 116.98m less vegetation removal required. The linear lengths of habitats proposed for replanting remain the same in either scenario with a similar nett gain of 1,103.06m relative to that permitted of 1,131m in a worst-case scenario. In this regard the Addendum to the EIAR concludes that *'following the implementation of the monitoring and mitigation programme....there is no potential for significant residual effects on bat species'*, and regarding linear habitats concludes that *'no potential for significant effects exists at any geographic scale'*.....with additional hedgerow planting resulting in a net gain.

Having regard to the above, and to the minor nature of the alterations proposed, I am satisfied that the proposed alterations do not have the potential to affect any ecological receptor beyond

		those already assessed in the permitted development either alone or in combination with any other plans or projects.	
2.3 Are there any other features of landscape, historic, archaeological, or cultural importance that could be affected?	No.	<p>The EIA of the permitted development assessed that there would be no adverse effect on cultural heritage subject to the full implementation of the EIAR mitigation measures and recommended planning conditions and that the proposed development would not give rise to any significant adverse cumulative impacts in-combination with other plans or projects.</p> <p>As the construction works and related activities are unchanged in relation to the proposed alterations, which are otherwise minor and do not increase the overall tip height I am satisfied that they will not alter this conclusion. I do not consider that this aspect of the project is likely to result in a significant effect on the environment.</p>	No.
2.4 Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, for example: forestry, agriculture, water/coastal, fisheries, minerals?	No.	Having regard to the minor nature of the alterations proposed, I do not consider that there is any potential to affect high quality or scarce resources.	No.
2.5 Are there any water resources including surface waters, for example: rivers, lakes/ponds, coastal or groundwaters which could be affected by the project, particularly in terms of their volume and flood risk?	No.	I do not consider that the nature of the proposed alterations to the dimensions of the permitted turbines, and alteration to the permitted electrical capacity of the wind farm, has any potential to result in significant effects associated with the volume of water resources or flood risk. The proposed construction works and related activities will remain identical to the permitted development, and as already discussed above it was determined in parent application that the original EIAR, including the CEMP and DMP	No.

		provided adequate measures for the protection of water quality.	
2.6 Is the location susceptible to subsidence, landslides or erosion?	No.	There is no evidence of these risks. I note from the Geological Survey of Ireland (GSI) landslide susceptibility mapping, that the area of the project is classified as low risk.	No.
2.7 Are there any key transport routes (eg National primary Roads) on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	No.	The EIA of the permitted development assessed that the proposed development would not give rise to a traffic hazard or endanger the safety of other road users, subject to full implementation of the EIAR mitigation measures and compliance with recommended conditions. The applicants EIASR in respect of the subject application submits that all potential routes which may be utilised in the delivery of the wind turbine components have been assessed as being capable of accommodating turbine components of the dimensions proposed in the alterations.	No.
2.8 Are there existing sensitive land uses or community facilities (such as hospitals, schools etc) which could be affected by the project?	No.	The EIA of the permitted development describes the rural location of the project as 'sparsely populated' with 'a small number of dispersed houses and farms along the regional and local road network'. The presence of several community and recreational uses in the wider area, including churches, schools and GAA pitches is noted. I am satisfied, that there are no sensitive community facilities, such as hospitals or schools in proximity to the site such that could be significantly affected by the project.	No.
3. Any other factors that should be considered which could lead to environmental impacts			
3.1 Cumulative Effects: Could this project together with existing and/or approved development result in	No.	The EIA of the permitted development concluded that the effects of the proposed development on the	No.

cumulative effects during the construction/ operation phase?		environment, by itself and in-combination with other plans and projects in the vicinity, would be acceptable. The EIASR submitted in respect of the subject application concluded that the proposed alterations would not give rise to impacts if a magnitude which, on their own or cumulatively, could cause a likely significant effect on the environment. The plans and projects considered in this cumulative assessment are set out in Table 3 of Appendix B to Annex 4 of the application and I note that this includes the alternative grid connection permitted under ABP-321238-24. I am satisfied that the minor nature of the proposed alterations does not include any mechanisms for significant effects. I am satisfied that the main potential effects arising are an increased risk of avian collision and mortality and additional habitat loss associated with increased bat mitigation buffers, but that for the reasons set out in this assessment, these effects are not significant.	
3.2 Transboundary Effects: Is the project likely to lead to transboundary effects?	No.	There are no transboundary effects arising.	No.
3.3 Are there any other relevant considerations?	No.	No.	No.
C. CONCLUSION			
No real likelihood of significant effects on the environment.	<input checked="" type="checkbox"/>	EIAR Not Required	
Real likelihood of significant effects on the environment.	<input type="checkbox"/>	EIAR Required	
D. MAIN REASONS AND CONSIDERATIONS			
Having regard to: -			

- The parent permission granted under ABP-313750-22 and the conditions to which it is subject,
- The minor nature and scale of the proposed alterations which can be constructed in accordance with the permitted construction works, methodologies and related activities ,
- The location of the proposed alterations within the footprint of the permitted development site and the absence of change to the permitted development layout,
- The pattern of development in the surrounding area,
- The criteria set out in Schedule 7 of the Planning and Development Regulations, 2001 (as amended),
- The location of the development outside of any sensitive location specified in Article 109(4)(a) of the Planning and Development Regulations, 2001 (as amended), and
- The Guidance set out in the 'Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding sub-threshold development' issued by the Department of the Environment, Heritage and Local Government (2003),

I conclude that the proposed development would not be likely to have significant effects on the environment, and that an environmental impact assessment report is not required.

Inspector _____

Date _____

Approved (ADP) _____

Date _____

Appendix 3: AA Screening Determination

Test for likely significant effects

Screening for Appropriate Assessment Test for likely significant effects				
Step 1: Description of the project and local site characteristics				
Brief description of project	<p>Alteration request in accordance with Section 146B regarding the permitted Seven Hills Wind Farm (ABP-313750-22). Alterations proposed:</p> <ul style="list-style-type: none"> The alteration of all wind turbine hub heights from 99m to between 98m and 101m; The alteration of all wind turbine rotor diameters from 162m to between 158m and 163m; The alteration of all wind turbine overall tip heights from 180m to between 179m and 180m. <p>This will result in an alteration to the electrical capacity of the project from 102MW to between 94.5MW and 122MW.</p>			
Brief description of development site characteristics and potential impact mechanisms	<p>The site consists primarily of rural grasslands with sporadic one-off rural housing in the general area. The primary potential impact mechanisms associated with the proposed alterations to the permitted turbine dimensions, including the rotor diameter, are an increased risk of avian collision and mortality which could result in changes to the range of potential collision heights.</p>			
Screening report	Yes			
Natura Impact Statement	Yes			
Relevant submissions	n/a			
Compliance with Article 6(3) of the EU Habitats Directive.				
<p>The proposed development is not directly connected to or necessary to the management of any European site and therefore is subject to the provisions of Article 6(3). The proposed development is examined in relation to any possible interaction with European sites designated Special Conservation Areas (SAC) and Special Protection Areas (SPA) to assess whether it may give rise to significant effects on any European Site.</p> <p>* Whilst some Conservation Objectives have been updated (as per NPWS.ie) since the parent development was permitted (2023), I am satisfied that the parent Appropriate Assessment, the Addendum NIS, the Collision Risk Modelling and this Stage 1 AA has considered all relevant QI's, SCI bird species and conservation objectives of the relevant European sites. I am satisfied that there are no lacunae in this assessment in respect of QI or SCI bird species of the relevant European Sites.</p> <p>* I have adopted the list of European Sites determined to be within the Zone of Influence (ZOI) of the permitted development as determined in the parent NIS and the AA in respect of ABP-313750-22, as I am satisfied that the proposed alterations do not introduce new pathways for effects.</p> <p>* The approximate distances given in the third column of the table above relate to the permitted windfarm development site excluding the permitted Grid Connection Route as the proposed alterations the subject of this request concern only the permitted turbine parameters.</p>				
Step 2. Identification of relevant European sites using the Source-pathway-receptor model				
European Site (code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed	Ecological connections ²	Consider further in screening ³

		development (km)		Y/N
Ballynamona Bog and Corkip Lough SAC (Site Code: 002339)	<ul style="list-style-type: none"> ▪ Turloughs [3180] ▪ Active raised bogs [7110] ▪ Degraded raised bogs still capable of natural regeneration [7120] ▪ Depressions on peat substrates of the Rhynchosporion [7150] ▪ Bog woodland [91D0] <p>https://www.npws.ie/protected-sites/sac/002339</p> <p>NPWS September 2016</p>	Approx. 1.2km at its closest point	Hydrological or Hydrogeological, including ground water.	Yes.
Killeglan Grassland SAC (Site Code: 002214)	<ul style="list-style-type: none"> ▪ Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] <p>https://www.npws.ie/protected-sites/sac/002214</p> <p>NPWS June 2018</p>	Approx. 0.5km at its closest point	Airborne.	Yes.
Four Roads Turlough SAC (Site Code: 001637)	<ul style="list-style-type: none"> ▪ Turloughs [3180] <p>https://www.npws.ie/protected-sites/sac/001637</p> <p>NPWS February 2018</p>	Approx. 3km at its closest point.	Hydrological or Hydrogeological, including ground water.	Yes.
River Shannon Callows SAC (Site Code: 000216)	<ul style="list-style-type: none"> ▪ Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410] ▪ Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis) [6510] ▪ Alkaline fens [7230] ▪ Limestone pavements [8240] ▪ Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] ▪ Lutra lutra (Otter) [1355] <p>https://www.npws.ie/protected-sites/sac/000216</p> <p>NPWS January 2022</p>	Approx. 14km at its closest point.	Hydrological.	Yes.
Four Roads Turlough SPA	<ul style="list-style-type: none"> ▪ Golden Plover (Pluvialis apricaria) [A140] 	Approx. 3km at its closest point.	Ornithological. Species either	Yes.

<p>(Site Code: 004140)</p>	<ul style="list-style-type: none"> ▪ Greenland White-fronted Goose (Anser albifrons flavirostris) [A395] ▪ Wetland and Waterbirds [A999] <p>https://www.npws.ie/protected-sites/spa/004140</p> <p>NPWS January 2025</p>		<p>recorded at the permitted development site during surveys or the permitted development site is within core foraging range(s).</p> <p>Hydrological or hydrogeological for wetland and water birds.</p>	
<p>Lough Croan Turlough SPA (Site Code: 004139)</p>	<ul style="list-style-type: none"> ▪ Golden Plover (Pluvialis apricaria) [A140] ▪ Greenland White-fronted Goose (Anser albifrons flavirostris) [A395] ▪ Shoveler (Spatula clypeata) [A857] ▪ Wetland and Waterbirds [A999] <p>https://www.npws.ie/protected-sites/spa/004139</p> <p>NPWS January 2025</p>	<p>Approx. 1.2km at its closest point.</p>	<p>Ornithological. Species either recorded at the permitted development site during surveys or the permitted development site is within core foraging range(s).</p> <p>Hydrological or hydrogeological for wetland and water birds.</p>	<p>Yes.</p>
<p>River Suck Callows SPA (Site Code: 004097)</p>	<ul style="list-style-type: none"> ▪ Whooper Swan (Cygnus cygnus) [A038] ▪ Golden Plover (Pluvialis apricaria) [A140] ▪ Lapwing (Vanellus vanellus) [A142] ▪ Greenland White-fronted Goose (Anser albifrons flavirostris) [A395] ▪ Wigeon (Mareca penelope) [A855] ▪ Wetland and Waterbirds [A999] <p>https://www.npws.ie/protected-sites/spa/004097</p> <p>NPWS November 2022</p>	<p>Approx. 2.5km at its closest point.</p>	<p>Ornithological. Species either recorded at the permitted development site during surveys or the permitted development site is within core foraging range(s).</p> <p>Hydrological or hydrogeological for wetland and water birds.</p>	<p>Yes.</p>
<p>Lough Ree SPA (Site Code: 004064)</p>	<ul style="list-style-type: none"> ▪ Little Grebe (Tachybaptus ruficollis) [A004] ▪ Whooper Swan (Cygnus cygnus) [A038] ▪ Teal (Anas crecca) [A052] ▪ Mallard (Anas platyrhynchos) [A053] ▪ Tufted Duck (Aythya fuligula) [A061] ▪ Common Scoter (Melanitta nigra) [A065] ▪ Goldeneye (Bucephala clangula) [A067] ▪ Coot (Fulica atra) [A125] ▪ Golden Plover (Pluvialis apricaria) [A140] ▪ Lapwing (Vanellus vanellus) [A142] 	<p>Approx. 9km at its closest point.</p>	<p>Ornithological. Species either recorded at the permitted development site during surveys or the permitted development site is within core foraging range(s).</p> <p>Hydrological or hydrogeological for wetland and water birds.</p>	<p>Yes.</p>

	<ul style="list-style-type: none"> ▪ Common Tern (<i>Sterna hirundo</i>) [A193] ▪ Wigeon (<i>Mareca penelope</i>) [A855] ▪ Shoveler (<i>Spatula clypeata</i>) [A857] ▪ Wetland and Waterbirds [A999] <p>https://www.npws.ie/protected-sites/spa/004064</p> <p>NPWS April 2025</p>			
Middle Shannon Callows SPA (Site Code: 004096)	<ul style="list-style-type: none"> ▪ Whooper Swan (<i>Cygnus cygnus</i>) [A038] ▪ Corncrake (<i>Crex crex</i>) [A122] ▪ Golden Plover (<i>Pluvialis apricaria</i>) [A140] ▪ Lapwing (<i>Vanellus vanellus</i>) [A142] ▪ Black-tailed Godwit (<i>Limosa limosa</i>) [A156] ▪ Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] ▪ Wigeon (<i>Mareca penelope</i>) [A855] ▪ Wetland and Waterbirds [A999] <p>https://www.npws.ie/protected-sites/spa/004096</p> <p>NPWS November 2022</p>	Approx. 12km at its closest point.	<p>Ornithological. Species either recorded at the permitted development site during surveys or the permitted development site is within core foraging range(s).</p> <p>Hydrological or hydrogeological for wetland and water birds.</p>	Yes.

Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
<p>Site 1: Ballynamona Bog and Corkip Lough SAC (Site Code: 002339)</p> <p>Turloughs [3180], Active raised bogs [7110], Degraded raised bogs still capable of natural regeneration [7120], Depressions on peat substrates of the Rhynchosporion [7150], Bog woodland [91D0]</p>	<p>None.</p> <p>There are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could affect terrestrial habitats, water quality, hydrology or hydrogeology including GWDTEs.</p>	<p>None.</p>
	<p>Likelihood of significant effects from proposed development (alone): No.</p>	
	<p>If No, is there likelihood of significant effects occurring in combination with other plans or projects? No.</p>	
	<p>Possibility of significant effects (alone) in view of the conservation objectives of the site* No.</p>	
	Impacts	Effects

<p>Site 2: Killeglan Grassland SAC (Site Code: 002214)</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]</p>	<p>None.</p> <p>There are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could affect dust or airborne pollution or terrestrial habitats.</p>	<p>None.</p>
	<p>Likelihood of significant effects from proposed development (alone): No.</p>	
	<p>If No, is there likelihood of significant effects occurring in combination with other plans or projects? No.</p>	
	<p>Possibility of significant effects (alone) in view of the conservation objectives of the site* No.</p>	
	<p>Impacts</p>	<p>Effects</p>
<p>Site 3: Four Roads Turlough SAC (Site Code: 001637)</p> <ul style="list-style-type: none"> ▪ Turloughs [3180] 	<p>None.</p> <p>There are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could affect terrestrial habitats, water quality, hydrology or hydrogeology including GWDTEs.</p>	<p>None.</p>
	<p>Likelihood of significant effects from proposed development (alone): No.</p>	
	<p>If No, is there likelihood of significant effects occurring in combination with other plans or projects? No.</p>	
	<p>Possibility of significant effects (alone) in view of the conservation objectives of the site* No.</p>	
	<p>Impacts</p>	<p>Effects</p>
<p>Site 4: River Shannon Callows SAC (Site Code: 000216)</p> <p>Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410], Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis) [6510], Alkaline fens [7230], Limestone pavements [8240], Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0], Lutra lutra (Otter) [1355]</p>	<p>None.</p> <p>There are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could affect terrestrial habitats or Q.I. interests through waterborne pollution.</p>	<p>None.</p>
	<p>Likelihood of significant effects from proposed development (alone): No.</p>	
	<p>If No, is there likelihood of significant effects occurring in combination with other plans or projects? No.</p>	
	<p>Possibility of significant effects (alone) in view of the conservation objectives of the site* No.</p>	

	Impacts	Effects
<p>Site 5: Four Roads Turlough SPA (Site Code: 004140)</p> <p>Golden Plover (<i>Pluvialis apricaria</i>) [A140], Greenland White-fronted Goose (<i>Anser albifrons flavirostris</i>) [A395], Wetland and Waterbirds [A999]</p>	<p>Direct. (<i>Golden Plover, Greenland White-fronted Goose</i>)</p> <p>Potential increased avian collision risk. Dependent on the turbine model selected, the proposed alteration could result in a 1m increase to a 4m decrease in the range of potential collision heights, which could alter the collision risk volume used within collision risk modelling.</p> <p>None. (<i>Wetland and Waterbirds</i>)</p> <p>There are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could affect wetland or waterbird habitat through waterborne pollution or alteration of local hydrology.</p>	<p>Increased avian mortality (<i>Golden Plover, Greenland White-fronted Goose</i>)</p>
	Likelihood of significant effects from proposed development (alone): Yes.	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? N/a	
	Possibility of significant effects (alone) in view of the conservation objectives of the site* Yes.	
	Impacts	Effects
<p>Site 6: Lough Croan Turlough SPA (Site Code: 004139)</p> <p>Golden Plover (<i>Pluvialis apricaria</i>) [A140], Greenland White-fronted Goose (<i>Anser albifrons flavirostris</i>) [A395], Shoveler (<i>Spatula clypeata</i>) [A857], Wetland and Waterbirds [A999]</p>	<p>Direct. (<i>Golden Plover, Greenland White-fronted Goose</i>)</p> <p>Potential increased avian collision risk. Dependent on the turbine model selected, the proposed alteration could result in a 1m increase to a 4m decrease in the range of potential collision heights, which could alter the collision risk volume used within collision risk modelling.</p> <p>None. (<i>Shoveler, Wetland and Waterbirds</i>)</p> <p>There are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could affect wetland or waterbird habitat through waterborne pollution or alteration of local hydrology.</p> <p>I note that Shoveler were not recorded in the bird surveys. Accordingly, there are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could significantly affect this species as a result of collision risk/mortality.</p>	<p>Increased avian mortality (<i>Golden Plover, Greenland White-fronted Goose</i>)</p>
	Likelihood of significant effects from proposed development (alone): Yes.	

	If No, is there likelihood of significant effects occurring in combination with other plans or projects? N/a.	
	Possibility of significant effects (alone) in view of the conservation objectives of the site* Yes.	
	Impacts	Effects
Site 7: River Suck Callows SPA (Site Code: 004097) Whooper Swan (<i>Cygnus cygnus</i>) [A038], Golden Plover (<i>Pluvialis apricaria</i>) [A140], Lapwing (<i>Vanellus vanellus</i>) [A142], Greenland White-fronted Goose (<i>Anser albifrons flavirostris</i>) [A395], Wigeon (<i>Mareca penelope</i>) [A855], Wetland and Waterbirds [A999]	<p>Direct. (<i>Whooper Swan, Golden Plover, Lapwing, Greenland White-fronted Goose & Wigeon</i>)</p> <p>Potential increased avian collision risk. Dependent on the turbine model selected, the proposed alteration could result in a 1m increase to a 4m decrease in the range of potential collision heights, which could alter the collision risk volume used within collision risk modelling.</p> <p>None. (<i>Wetland and Waterbirds</i>)</p> <p>There are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could affect wetland or waterbird habitat through waterborne pollution or alteration of local hydrology.</p>	<p>Increased avian mortality (<i>Whooper Swan, Golden Plover, Lapwing, Greenland White-fronted Goose & Wigeon</i>)</p>
	Likelihood of significant effects from proposed development (alone): Yes.	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? N/a.	
	Possibility of significant effects (alone) in view of the conservation objectives of the site* Yes.	
	Impacts	Effects
Site 8: Lough Ree SPA (Site Code: 004064) Little Grebe (<i>Tachybaptus ruficollis</i>) [A004], Whooper Swan (<i>Cygnus cygnus</i>) [A038], Teal (<i>Anas crecca</i>) [A052], Mallard (<i>Anas platyrhynchos</i>) [A053], Tufted Duck (<i>Aythya fuligula</i>) [A061], Common Scoter (<i>Melanitta nigra</i>) [A065], Goldeneye (<i>Bucephala clangula</i>) [A067], Coot (<i>Fulica atra</i>) [A125], Golden Plover (<i>Pluvialis apricaria</i>) [A140], Lapwing (<i>Vanellus vanellus</i>) [A142], Common Tern (<i>Sterna hirundo</i>) [A193], Wigeon (<i>Mareca penelope</i>) [A855], Shoveler (<i>Spatula clypeata</i>) [A857], Wetland and Waterbirds [A999]	<p>Direct. (<i>Whooper Swan, Golden Plover, Lapwing & Wigeon</i>)</p> <p>Potential increased avian collision risk. Dependent on the turbine model selected, the proposed alteration could result in a 1m increase to a 4m decrease in the range of potential collision heights, which could alter the collision risk volume used within collision risk modelling.</p> <p><i>* Teal, Mallard, Common Scooter & Coot – not modelled as number of flights so low that collision risk was negligible.</i></p> <p>None. (<i>Little Grebe, Tufted Duck, Goldeneye, Common Tern, Shoveler, Wetland and Waterbirds</i>)</p> <p>There are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could affect wetland</p>	<p>Increased avian mortality (<i>Whooper Swan, Golden Plover, Lapwing & Wigeon</i>)</p>

	<p>or waterbird habitat through waterborne pollution or alteration of local hydrology.</p> <p>I note that Little Grebe, Tufted Duck, Goldeneye, Common Tern, and Shoveler were not recorded in the bird surveys. Accordingly, there are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could significantly affect these species as a result of collision risk/mortality.</p>	
	Likelihood of significant effects from proposed development (alone): Yes.	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? N/a.	
	Possibility of significant effects (alone) in view of the conservation objectives of the site* Yes.	
	Impacts	Effects
<p>Site 9: Middle Shannon Callows SPA (Site Code: 004096)</p> <p>Whooper Swan (<i>Cygnus cygnus</i>) [A038], Corncrake (<i>Crex crex</i>) [A122], Golden Plover (<i>Pluvialis apricaria</i>) [A140], Lapwing (<i>Vanellus vanellus</i>) [A142], Black-tailed Godwit (<i>Limosa limosa</i>) [A156], Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179], Wigeon (<i>Mareca penelope</i>) [A855], Wetland and Waterbirds [A999]</p>	<p>Direct. (<i>Golden Plover, Lapwing, Wigeon</i>)</p> <p>Potential increased avian collision risk. Dependent on the turbine model selected, the proposed alteration could result in a 1m increase to a 4m decrease in the range of potential collision heights, which could alter the collision risk volume used within collision risk modelling.</p> <p><i>*Black-headed Gull– not modelled as number of flights so low that collision risk was negligible.</i></p> <p>None. (<i>Whooper Swan, Corncrake, Black-tailed Godwit, Wetland and Waterbirds</i>)</p> <p>There are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could affect wetland or waterbird habitat through waterborne pollution or alteration of local hydrology.</p> <p>I note that Corncrake and Black-tailed Godwit were not recorded in the bird surveys, and the proposed development is beyond the core foraging range for Whooper Swan. Accordingly, there are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could significantly affect these species as a result of collision risk/mortality.</p>	<p>Increased avian mortality (<i>Golden Plover, Lapwing, Wigeon</i>)</p>
	Likelihood of significant effects from proposed development (alone): Yes.	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? N/a.	

	<p>Possibility of significant effects (alone) in view of the conservation objectives of the site* Yes.</p>
<p>The following Special Protection Areas (SPA's) lie within 15km of the permitted development site: Lough Croan SPA (1.2Kkm), River Suck Callows SPA (2.5km), Four Roads Turlough SPA (3km), Lough Ree SPA (9km) and Middle Shannon Callows SPA (12km). All of these sites include QI interests (bird species) which were either recorded within the permitted development site during bird surveys, or which have core foraging ranges extending to include the permitted development site (as detailed above at Step 3).</p> <p>As a windfarm development, there is potential for collision risk on QI bird species utilizing the wider area (including the permitted development site) and beyond the designated SPA's. Alterations to the turbine parameters, depending upon the final turbine model selected, could result in a 1m increase to a 4m decrease in the range of potential collision heights, which could alter the collision risk volume used within the Collision Risk Model (CRM) and the values predicted for avian collision.</p>	
<p>Step 4 Conclude if the proposed development could result in likely significant effects on a European site</p>	
<p>Based on the alterations proposed, the physical footprint of the permitted development will remain unchanged, construction works, related activities and methodologies will remain unchanged and mitigation measures remain unchanged. No further mitigation measures are required for the proposed alterations during the construction phase. There are no mechanisms by which the proposed alterations to the dimensions of the permitted turbines or the electrical capacity of the permitted development could affect terrestrial habitats, water quality, hydrology or hydrogeology including GWDTEs.</p> <p>The addendum NIS also discusses bat buffer zones, however as bats are not a QI interest of any of the European sites considered at Step 2 and 3 above, this matter is discussed in my environmental screening assessment and determination.</p> <p>In relation to avian collision risk, a possible effect on certain QI bird species as detailed in Step 3 above was identified. Potential for adverse effects due to avian collision risk affecting bird populations listed as Special Conservation Interests (SCI) of the SPAs set out hereunder could not be ruled out at Stage 1 AA:</p> <ul style="list-style-type: none"> ○ Four Roads Turlough SPA (004140) - (<i>Golden Plover, Greenland White-fronted Goose</i>) ○ Lough Croan Turlough SPA (004139) - (<i>Golden Plover, Greenland White-fronted Goose</i>) ○ River Suck Callows SPA (004097) - (<i>Whooper Swan, Golden Plover, Lapwing, Greenland White-fronted Goose & Wigeon</i>) ○ Lough Ree SPA (004064) - (<i>Whooper Swan, Golden Plover, Lapwing & Wigeon</i>) ○ Middle Shannon Callows SPA (004096) - (<i>Golden Plover, Lapwing, Wigeon</i>) <p>Accordingly, I conclude that it is not possible to exclude the possibility that proposed development alone would result significant effects on Four Roads Turlough SPA (004140), Lough Croan Turlough SPA (004139), River Suck Callows SPA (004097), Lough Ree SPA (004064) and Middle Shannon Callows SPA (004096) from effects associated with avian collision risk. An appropriate assessment is required on the basis of the possible effects of the project 'alone'. Further assessment in combination with other plans and projects is not required at screening stage.</p> <p>The mitigation measures that form part of the permitted parent permission, will apply to the subject development. Notwithstanding this, <u>no measures</u> designed or intended to avoid or reduce any harmful effects of the project on a European Site have been relied upon in this screening exercise.</p>	

Screening Determination

Significant effects cannot be excluded

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that it is not possible to exclude that the proposed development alone will give rise to significant effects as a result of avian collision risk on Four Roads Turlough SPA (004140), Lough Croan Turlough SPA (004139), River Suck Callows SPA (004097), Lough Ree SPA (004064) and Middle Shannon Callows SPA (004096) European Site(s) in view of the sites conservation objectives and a number of qualifying interests of those sites.

It is therefore determined that Appropriate Assessment (Stage 2) [Under Section 177V of the Planning and Development Act, 2000 (as amended)] is required.

This determination is based on:

- The nature of the proposed alterations the subject of this application which seeks a range of flexibility in the permitted turbine dimensions/parameters with a consequential alteration of the electrical capacity of the permitted wind farm.
- The physical footprint of the permitted development, the construction methodology and the original mitigation measures which all remain unchanged from the permitted development.
- The ornithological link between the development site and Four Roads Turlough SPA (004140), Lough Croan Turlough SPA (004139), River Suck Callows SPA (004097), Lough Ree SPA (004064) and Middle Shannon Callows SPA (004096)

Inspector _____

Date _____

Appendix 4: AA and AA Determination

Appropriate Assessment

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

Taking account of the preceding screening determination, the following is an appropriate assessment of the implications of the proposed development in view of the relevant conservation objectives of Four Roads Turlough SPA (004140), Lough Croan Turlough SPA (004139), River Suck Callows SPA (004097), Lough Ree SPA (004064) and Middle Shannon Callows SPA (004096) based on scientific information provided by the Applicant.

The information relied upon includes the following:

- **Planning Statement (PS)** which includes:
 - o *Annex 1 & 2 – Drawings of the permitted development and proposed alterations (site location, layout plans and elevations)*
 - o *Annex 3 - Environmental Impact Assessment Screening Report (EIASR)*
 - o *Annex 4 - Addendum Natura Impact Statement (ANIS)*

- **Environmental Report (ER)** which includes:
 - o *Annex 1 – Addendum to EIAR Biodiversity and Ornithology Chapters*
 - o *Annex 2 – Landscape & Visual Impact Assessment (LVIA)*
 - o *Annex 3 – Comparative Photomontages*

I am satisfied that the information provided is adequate to allow for Appropriate Assessment. I am satisfied that all aspects of the project which could result in significant effects are considered and assessed in the ANIS and mitigation measures designed to avoid or reduce any adverse effects on site integrity are included and assessed for effectiveness.

Submissions/observations

Department of Housing, Heritage and Local Government

- No observations made on nature conservation.

Public Submissions

- A single public submission was received from Wind Turbine Action Group South Roscommon. Whilst this submission raised biodiversity concerns in relation to grasslands within third party lands adjoining the development site, these lands are not a designated European Site. This submission is therefore considered in Section 7.1.7 of my report.

Four Roads Turlough SPA (004140):

Summary of Key issues that could give rise to adverse effects (from screening stage):

- (i) **Increased avian collision risk & avian mortality**

See Section 4.2 of the Addendum NIS

Qualifying Interest features likely to be affected	Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures (summary)
Golden Plover [A140]	To restore the Favourable conservation condition of	Potential increased collision risk & mortality	None.

	<p>Golden Plover at Four Roads Turlough SPA</p> <p><i>Long term winter population trend stable or increasing, sufficient winter spatial distribution of suitable habitat to support population target, no significant disturbance to pop. trend or spatial distribution, no sig. barriers to SPA or other ecologically important sites, sufficient suitable habitat and forage biomass, sufficient suitable roosting habitat and sufficient utilisable habitat in ecologically important sites outside SPA.</i></p>		
Greenland White-fronted Goose [A395]	<p>To restore the Favourable conservation condition of Greenland White-fronted Goose at Four Roads Turlough SPA</p> <p><i>As above.</i></p>	Potential increased collision risk & mortality	None.

The QI 'Wetland and Waterbirds' [A999] of this SPA was excluded at the preceding AA Screening Stage for the reasons given in Step 3 thereof. (See Appendix 3).

The above table is based on the documentation and information provided on the file and that available at www.NPWS.ie and I am satisfied that the submitted ANIS has identified the relevant attributes and targets of the Qualifying Interests. In particular, I note those relating to long term winter population trend, disturbance and barriers.

Assessment of issues that could give rise to adverse effects view of conservation objectives

The Four Roads Turlough SPA is within approx. 3km of the proposed development site. The SPA includes two SCI bird species, Golden Plover and Greenland White-fronted Goose, which were either recorded within the permitted development site during bird surveys, or which have core foraging ranges extending to include the permitted development site (as detailed above at Step 3 of Appendix 3). As a windfarm development, there is potential for collision risk on SCI bird species. Alterations to the turbine parameters, depending upon the final turbine model selected, could result in a 1m increase to a 4m decrease in the range of potential collision heights, which could alter the collision risk volume used within the Collision Risk Model (CRM) and the values predicated for avian collision.

(i) Potential increased avian collision risk & avian mortality

This is assessed in Section 4.2 of the ANIS. Collision risk for this SPA and the said SCI species was re-modelled against a best- and worst-case scenario for the range of alternative turbine permutations proposed. The proposed alterations to the permitted turbine parameters could result in a 1m increase (0.6%) to a 4m decrease (2.5%) in the range of potential collision heights. The results are presented in Table 4-1 of the ANIS with detailed modelling spreadsheets set out in Appendix A thereto. For both SCI species the re-modelled collision risk predicts a small reduction in modelled collisions per year in both a best- and worst-case scenario and finds no change in the predicted mortality rate relative to background mortality in either scenario.

The ANIS draws general findings in respect of all SPA's that were screened in for Stage 2 AA and finds that there will be no effect on modelled collision mortality for the range of alternative turbine permutations when compared to that for the permitted development. Specifically, the ANIS finds that in almost all cases collision mortality relative to background is the same as permitted, and that for some species it is marginally smaller than permitted. On this basis the ANIS finds that the effects of the proposed alterations on the integrity of all SPA's 'alone' is the same as reported in the parent NIS in respect of the permitted development.

I note that the Stage 2 AA in respect of the parent permitted development, found that there would be no significant adverse impacts resulting from, inter alia, collision risk or resultant fatalities on the SCI species of this SPA and that the project would not have an adverse effect on the SCI species at a population level. I accept the findings of the addendum NIS in relation to avian collision risk based on the minor nature of the proposed alterations and the re-

modelling carried out. I consider that the conclusion of the original NIS remains valid and that there are no significant effects predicted in relation to avian collision risk as a result of the proposed alterations.

Mitigation Measures and Conditions

The ANIS states that as the proposed alterations will not change the connectivity of the permitted development to a European Site and will not change the 'alone' or 'in-combination' effects identified, there is no need to alter any of the original mitigations measures or introduce new mitigation measures.

I am satisfied that no new mitigation measures are proposed or required. I am further satisfied that with the implementation of all mitigation measures described in Section 6.2 of the original NIS of the parent permitted development (313750-22) and in the absence of any identified adverse change to avian collision risk or mortality, that no significant adverse effects will result from the proposed alterations on Four Roads Turlough SPA (004140), its QI interests or SCI bird species.

In-combination effects

I am satisfied that in-combination effects has been assessed adequately in the ANIS. The plans and projects considered in this cumulative assessment are set out in Table 3 of Appendix B to Annex 4 of the application and I note that this includes the alternative grid connection permitted under ABP-321238-24. In respect of the parent permitted development (313750-22) the applicant demonstrated satisfactorily that no significant residual effects would remain post the application of the mitigation measures contained within the original NIS, and in respect of the proposed alterations has demonstrated satisfactorily that they will not give rise to any new or additional effects which require mitigation. Accordingly, I am satisfied that there is therefore no potential for in-combination effects as a result of the proposed alterations.

Findings and conclusions

The applicant determined that with the implementation of all previously committed mitigation measures there is no possibility of the proposed alterations alone, **or in combination with other plans and projects**, adversely affecting the integrity of any European site.

Based on the information provided, I am satisfied that adverse effects arising from aspects of the proposed development (alterations) can be excluded for the Four Roads Turlough SPA (004140). No direct or indirect impacts are predicted. I am satisfied that the mitigation measures proposed to prevent adverse effects in the original NIS in respect of the parent development (313750-22) have been assessed as effective and can be implemented, and that the proposed alterations do not change this assessment or determination.

Reasonable scientific doubt

I am satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

The proposed development (alterations) will not affect the attainment of the Conservation objectives of the Four Roads Turlough SPA (004140). Adverse effects on site integrity can be excluded and no reasonable scientific doubt remains as to the absence of such effects.

Lough Croan Turlough SPA (Site Code: 004139):

Summary of Key issues that could give rise to adverse effects (from screening stage):

- (i) Increased avian collision risk & avian mortality

See Section 4.2 of the Addendum NIS

Qualifying Interest features likely to be affected	Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures (summary)
Golden Plover [A140]	To restore the Favourable conservation condition of	Potential increased collision risk & mortality	None.

	Golden Plover at Lough Croan Turlough SPA <i>As above for SCI species.</i>		
Greenland White-fronted Goose [A395]	To restore the Favourable conservation condition of Greenland White-fronted Goose at Lough Croan Turlough SPA <i>As above for SCI species.</i>	Potential increased collision risk & mortality	None.

The QI 'Wetland and Waterbirds' [A999] and SCI bird species 'Shoveler' of this SPA were excluded at the preceding AA Screening Stage for the reasons given in Step 3 thereof. (See Appendix 3).

The above table is based on the documentation and information provided on the file and that available at www.NPWS.ie and I am satisfied that the submitted ANIS has identified the relevant attributes and targets of the Qualifying Interests. In particular, I note those relating to long term winter population trend, disturbance and barriers.

Assessment of issues that could give rise to adverse effects view of conservation objectives

The Lough Croan Turlough SPA is within approx. 1.2km of the proposed development site. *As above for Four Roads Turlough SPA (004140).*

(i) Potential increased avian collision risk & avian mortality

As above for Four Roads Turlough SPA (004140).

Mitigation Measures and Conditions

As above for Four Roads Turlough SPA (004140).

In-combination effects

As above for Four Roads Turlough SPA (004140).

Findings and conclusions

The applicant determined that with the implementation of all previously committed mitigation measures there is no possibility of the proposed alterations alone, **or in combination with other plans and projects**, adversely affecting the integrity of any European site.

Based on the information provided, I am satisfied that adverse effects arising from aspects of the proposed development (alterations) can be excluded for the Lough Croan Turlough SPA (004139). No direct or indirect impacts are predicted. I am satisfied that the mitigation measures proposed to prevent adverse effects in the original NIS in respect of the parent development (313750-22) have been assessed as effective and can be implemented, and that the proposed alterations do not change this assessment or determination.

Reasonable scientific doubt

I am satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

The proposed development (alterations) will not affect the attainment of the Conservation objectives of the Lough Croan Turlough SPA (004139). Adverse effects on site integrity can be excluded and no reasonable scientific doubt remains as to the absence of such effects.

River Suck Callows SPA (004097):

Summary of Key issues that could give rise to adverse effects (from screening stage):

- (i) Increased avian collision risk & avian mortality**

See Section 4.2 of the Addendum NIS

Qualifying Interest features likely to be affected	Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures (summary)
Whooper Swan [A038]	<p>To maintain the favourable conservation condition of whooper swan in River Suck Callows SPA</p> <p><i>Long term winter population trend stable or increasing, sufficient winter spatial distribution of suitable habitat to support population target, no significant disturbance to pop. trend or spatial distribution, no sig. barriers to SPA or other ecologically important sites, sufficient suitable habitat and forage biomass, sufficient suitable roosting habitat and sufficient utilisable habitat in ecologically important sites outside SPA.</i></p>	Potential increased collision risk & mortality	None.
Golden Plover [A140]	<p>To restore the Favourable conservation condition of Golden Plover at River Suck Callows SPA</p> <p><i>As above for SCI species.</i></p>	Potential increased collision risk & mortality	None.
Lapwing [A142]	<p>To restore the favourable conservation condition of lapwing in River Suck Callows SPA</p> <p><i>Long term winter population trend stable or increasing, sufficient winter spatial distribution of suitable habitat to support population target, no significant disturbance to pop. trend or spatial distribution, no sig. barriers to SPA or other ecologically important sites, sufficient suitable habitat and forage biomass, sufficient suitable roosting habitat and sufficient utilisable habitat in ecologically important sites outside SPA.</i></p>	Potential increased collision risk & mortality	None.
Greenland White-fronted Goose [A395]	<p>To restore the Favourable conservation condition of Greenland White-fronted Goose at River Suck Callows SPA</p> <p><i>As above for SCI species.</i></p>	Potential increased collision risk & mortality	None.
Wigeon [A855]	<p>To restore the favourable conservation condition of wigeon in River Suck Callows SPA</p> <p><i>Long term winter population trend stable or increasing, sufficient winter spatial distribution of</i></p>	Potential increased collision risk & mortality	None.

suitable habitat to support population target, no significant disturbance to pop. trend or spatial distribution, no sig. barriers to SPA or other ecologically important sites, sufficient suitable habitat and forage biomass, sufficient suitable roosting habitat and sufficient utilisable habitat in ecologically important sites outside SPA.

The QI 'Wetland and Waterbirds' [A999] of this SPA was excluded at the preceding AA Screening Stage for the reasons given in Step 3 thereof. (See Appendix 3).

The above table is based on the documentation and information provided on the file and that available at www.NPWS.ie and I am satisfied that the submitted ANIS has identified the relevant attributes and targets of the Qualifying Interests. In particular, I note those relating to long term winter population trend, disturbance and barriers.

Assessment of issues that could give rise to adverse effects view of conservation objectives

The River Suck Callows SPA is within approx. 2.5km of the proposed development site. The SPA includes five SCI bird species, Whooper Swan, Golden Plover, Lapwing, Greenland White-fronted Goose and Wigeon, which were either recorded within the permitted development site during bird surveys, or which have core foraging ranges extending to include the permitted development site (as detailed above at Step 3 of Appendix 3). As a windfarm development, there is potential for collision risk on SCI bird species. Alterations to the turbine parameters, depending upon the final turbine model selected, could result in a 1m increase to a 4m decrease in the range of potential collision heights, which could alter the collision risk volume used within the Collision Risk Model (CRM) and the values predicated for avian collision.

(i) Potential increased avian collision risk & avian mortality

This is assessed in Section 4.2 of the ANIS. Collision risk for this SPA and the said SCI species was re-modelled against a best- and worst-case scenario for the range of alternative turbine permutations proposed. The proposed alterations to the permitted turbine parameters could result in a 1m increase (0.6%) to a 4m decrease (2.5%) in the range of potential collision heights. The results are presented in Table 4-1 of the ANIS with detailed modelling spreadsheets set out in Appendix A thereto. For Whooper Swan, Golden Plover and Lapwing the re-modelled collision risk predicts a small reduction in modelled collisions per year and predicted morality rate relative to background mortality in both a best- and worst-case scenario. For Greenland White-fronted Goose and Wigeon the re-modelled collision risk predicts a small reduction in modelled collisions per year in both a best- and worst-case scenario and finds no change or a small reduction in the predicted morality rate relative to background mortality in either scenario.

Otherwise as above for Four Roads Turlough SPA (004140).

Mitigation Measures and Conditions

As above for Four Roads Turlough SPA (004140).

In-combination effects

As above for Four Roads Turlough SPA (004140).

Findings and conclusions

The applicant determined that with the implementation of all previously committed mitigation measures there is no possibility of the proposed alterations alone, **or in combination with other plans and projects**, adversely affecting the integrity of any European site.

Based on the information provided, I am satisfied that adverse effects arising from aspects of the proposed development (alterations) can be excluded for the River Suck Callows SPA (004097). No direct or indirect impacts are predicted. I am satisfied that the mitigation measures proposed to prevent adverse effects in the original NIS in

respect of the parent development (313750-22) have been assessed as effective and can be implemented, and that the proposed alterations do not change this assessment or determination.

Reasonable scientific doubt

I am satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

The proposed development (alterations) will not affect the attainment of the Conservation objectives of the River Suck Callows SPA (004097). Adverse effects on site integrity can be excluded and no reasonable scientific doubt remains as to the absence of such effects.

Lough Ree SPA (004064):

Summary of Key issues that could give rise to adverse effects (from screening stage):

- (i) **Increased avian collision risk & avian mortality**

See Section 4.2 of the Addendum NIS

Qualifying Interest features likely to be affected	Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures (summary)
Whooper Swan [A038]	To restore the Favourable conservation condition of Whooper Swan in Lough Ree SPA <i>As above for SCI species.</i>	Potential increased collision risk & mortality	None.
Golden Plover [A140]	To restore the Favourable conservation condition of Golden Plover at Lough Ree SPA <i>As above for SCI species.</i>	Potential increased collision risk & mortality	None.
Lapwing [A142]	To restore the Favourable conservation condition of Lapwing in Lough Ree SPA <i>As above for SCI species.</i>	Potential increased collision risk & mortality	None.
Wigeon [A855]	To restore the Favourable conservation condition of Wigeon in Lough Ree SPA <i>As above for SCI species.</i>	Potential increased collision risk & mortality	None.

The SCI bird species ‘Teal, Mallard, Common Scooter, Coot, Little Grebe, Tufted Duck, Goldeneye, Common Tern & Shoveler’ and the QI ‘Wetland and Waterbirds’ [A999] of this SPA were excluded at the preceding AA Screening Stage for the reasons given in Step 3 thereof. (See Appendix 3).

The above table is based on the documentation and information provided on the file and that available at www.NPWS.ie and I am satisfied that the submitted ANIS has identified the relevant attributes and targets of the Qualifying Interests. In particular, I note those relating to long term winter population trend, disturbance and barriers.

Assessment of issues that could give rise to adverse effects view of conservation objectives

The Lough Ree SPA (004064) is within approx. 9km of the proposed development site. The SPA includes four SCI bird species, Whooper Swan, Golden Plover, Lapwing and Wigeon, which were either recorded within the permitted development site during bird surveys, or which have core foraging ranges extending to include the permitted

development site (as detailed above at Step 3 of Appendix 3). As a windfarm development, there is potential for collision risk on SCI bird species. Alterations to the turbine parameters, depending upon the final turbine model selected, could result in a 1m increase to a 4m decrease in the range of potential collision heights, which could alter the collision risk volume used within the Collision Risk Model (CRM) and the values predicated for avian collision.

(i) Potential increased avian collision risk & avian mortality

This is assessed in Section 4.2 of the ANIS. Collision risk for this SPA and the said SCI species was re-modelled against a best- and worst-case scenario for the range of alternative turbine permutations proposed. The proposed alterations to the permitted turbine parameters could result in a 1m increase (0.6%) to a 4m decrease (2.5%) in the range of potential collision heights. The results are presented in Table 4-1 of the ANIS with detailed modelling spreadsheets set out in Appendix A thereto. For Whooper Swan and Lapwing the re-modelled collision risk predicts a small reduction in modelled collisions per year and predicted morality rate relative to background mortality in both a best- and worst-case scenario. For Golden Plover and Wigeon the re-modelled collision risk predicts a small reduction in modelled collisions per year in both a best- and worst-case scenario and finds no change or a small reduction in the predicted morality rate relative to background mortality in either scenario.

Otherwise as above for Four Roads Turlough SPA (004140).

Mitigation Measures and Conditions

As above for Four Roads Turlough SPA (004140).

In-combination effects

As above for Four Roads Turlough SPA (004140).

Findings and conclusions

The applicant determined that with the implementation of all previously committed mitigation measures there is no possibility of the proposed alterations alone, **or in combination with other plans and projects**, adversely affecting the integrity of any European site.

Based on the information provided, I am satisfied that adverse effects arising from aspects of the proposed development (alterations) can be excluded for the Lough Ree SPA (004064). No direct or indirect impacts are predicted. I am satisfied that the mitigation measures proposed to prevent adverse effects in the original NIS in respect of the parent development (313750-22) have been assessed as effective and can be implemented, and that the proposed alterations do not change this assessment or determination.

Reasonable scientific doubt

I am satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

The proposed development (alterations) will not affect the attainment of the Conservation objectives of the Lough Ree SPA (004064). Adverse effects on site integrity can be excluded and no reasonable scientific doubt remains as to the absence of such effects.

Middle Shannon Callows SPA (004096):

Summary of Key issues that could give rise to adverse effects (from screening stage):

- (i) Increased avian collision risk & avian mortality**

See Section 4.2 of the Addendum NIS

Qualifying Interest features likely to be affected	Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures (summary)
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Golden Plover [A140]	To maintain the Favourable conservation condition of Golden Plover at Middle Shannon Callows SPA <i>As above for SCI species.</i>	Potential increased collision risk & mortality	None.
Lapwing [A142]	To restore the Favourable conservation condition of Middle Shannon Callows SPA <i>As above for SCI species.</i>	Potential increased collision risk & mortality	None.
Wigeon [A855]	To restore the Favourable conservation condition of Wigeon in Middle Shannon Callows SPA <i>As above for SCI species.</i>	Potential increased collision risk & mortality	None.

The SCI bird species 'Black-headed Gull, Teal, Mallard, Whooper Swan, Corncrake, Black-tailed Godwit' and the QI 'Wetland and Waterbirds' [A999] of this SPA were excluded at the preceding AA Screening Stage for the reasons given in Step 3 thereof. (See Appendix 3).

The above table is based on the documentation and information provided on the file and that available at www.NPWS.ie and I am satisfied that the submitted ANIS has identified the relevant attributes and targets of the Qualifying Interests. In particular, I note those relating to long term winter population trend, disturbance and barriers.

Assessment of issues that could give rise to adverse effects view of conservation objectives

The Middle Shannon Callows SPA (004096) is within approx. 12km of the proposed development site. The SPA includes three SCI bird species Golden Plover, Lapwing and Wigeon, which were either recorded within the permitted development site during bird surveys, or which have core foraging ranges extending to include the permitted development site (as detailed above at Step 3 of Appendix 3). As a windfarm development, there is potential for collision risk on SCI bird species. Alterations to the turbine parameters, depending upon the final turbine model selected, could result in a 1m increase to a 4m decrease in the range of potential collision heights, which could alter the collision risk volume used within the Collision Risk Model (CRM) and the values predicated for avian collision.

(i) Potential increased avian collision risk & avian mortality

This is assessed in Section 4.2 of the ANIS. Collision risk for this SPA and the said SCI species was re-modelled against a best- and worst-case scenario for the range of alternative turbine permutations proposed. The proposed alterations to the permitted turbine parameters could result in a 1m increase (0.6%) to a 4m decrease (2.5%) in the range of potential collision heights. The results are presented in Table 4-1 of the ANIS with detailed modelling spreadsheets set out in Appendix A thereto. For Lapwing the re-modelled collision risk predicts a small reduction in modelled collisions per year and predicted morality rate relative to background mortality in both a best- and worst-case scenario. For Golden Plover and Wigeon the re-modelled collision risk predicts a small reduction in modelled collisions per year in both a best- and worst-case scenario and finds no change or a small reduction in the predicted morality rate relative to background mortality in either scenario.

Otherwise as above for Four Roads Turlough SPA (004140).

Mitigation Measures and Conditions

As above for Four Roads Turlough SPA (004140).

In-combination effects

As above for Four Roads Turlough SPA (004140).

Findings and conclusions

The applicant determined that with the implementation of all previously committed mitigation measures there is no possibility of the proposed alterations alone, **or in combination with other plans and projects**, adversely affecting the integrity of any European site.

Based on the information provided, I am satisfied that adverse effects arising from aspects of the proposed development (alterations) can be excluded for the Middle Shannon Callows SPA (004096). No direct or indirect impacts are predicted. I am satisfied that the mitigation measures proposed to prevent adverse effects in the original NIS in respect of the parent development (313750-22) have been assessed as effective and can be implemented, and that the proposed alterations do not change this assessment or determination.

Reasonable scientific doubt

I am satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

The proposed development (alterations) will not affect the attainment of the Conservation objectives of the Middle Shannon Callows SPA (004096). Adverse effects on site integrity can be excluded and no reasonable scientific doubt remains as to the absence of such effects.

Appropriate Assessment Conclusion: Integrity Test

In screening the need for Appropriate Assessment, it was determined that the proposed development could result in significant effects on the Four Roads Turlough SPA (004140), Lough Croan Turlough SPA (004139), River Suck Callows SPA (004097), Lough Ree SPA (004064) and Middle Shannon Callows SPA (004096) in view of the conservation objectives of those sites and that Appropriate Assessment under the provisions of S177V was required.

Following an examination, analysis and evaluation of the ANIS all associated material submitted and taking into account the submissions received, I consider that adverse effects on site integrity of the Four Roads Turlough SPA (004140), Lough Croan Turlough SPA (004139), River Suck Callows SPA (004097), Lough Ree SPA (004064) and Middle Shannon Callows SPA (004096) can be excluded in view of the conservation objectives of these sites and that no reasonable scientific doubt remains as to the absence of such effects.

My conclusion is based on the following:

- The minor nature and character of the proposed alterations to the dimensions of the permitted turbines,
- The results of the collision risk re-modelling which predicts no change or a small reduction in collisions per year and predicted morality rate relative to background mortality in both a best- and worst-case scenario for the range of alternative turbine permutations proposed,
- The absence of any change to the construction or work-related activities and associated methodologies,
- The site-specific conservation objectives, targets, attributes, QI's and SCI's of the respective European Sites as detailed and assessed in my Stage 2 AA as appended to this report (Appendix 4)
- The proposed development will not affect the attainment of conservation objectives for the Four Roads Turlough SPA (004140), Lough Croan Turlough SPA (004139), River Suck Callows SPA (004097), Lough Ree SPA (004064) and Middle Shannon Callows SPA (004096) or prevent or delay the restoration of favourable conservation condition for Golden Plover, Greenland White-fronted Goose, Whooper Swan, Lapwing, & Wigeon
- The effectiveness of the suite of mitigation measures set out in the parent permitted development ABP-313750-22 which will be implemented in full.

Inspector _____

Date _____