SPECIALIST REPORT TO PLANNING: ORNITHOLOGY – ACP 323783

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SECTION 1- ORNITHOLOGICAL IMPACT ASSESSMENT TO ACCOMPANY THE EIA

INTRODUCTION

This Specialist Report to the Inspector and available to the Commission is a written record of my review and examination of the submitted information in the planning application for Cloonkett Wind Farm regarding ornithology and the requirements for Appropriate Assessment (AA) (including screening) in relation to bird interests. I can confirm that I have the relevant expertise to provide an independent professional appraisal as to the adequacy of the information for the Inspector and the Board to undertake AA and Environmental Impact Assessment (EIA) of the proposed project.

In the review of the biodiversity aspects of the Environmental Impact Assessment Report (EIAR), I focus my examination on key issues raised in submissions including on hen harrier, kestrel and waterbirds.

In the review of the Natura Impact Statement (NIS), I focus my examination on key issues raised in submissions and the requirements for screening and for AA in view of the conservation objectives of relevant European Sites.

I have reviewed the scope of the proposed development as described in the EIAR and NIS, which consists of the construction of a 14-turbine wind farm, permanent 220kV substation and ancillary works.

I have reviewed and examined the following documents including relevant appendices and figures (plans and particulars):

- NIS including AA Screening Report;
- EIAR with particular focus on Chapters 9 Biodiversity and Chapter 17 Interactions of the foregoing and associated figures and appendices; and
- Applicant's response to submissions.

The documents have been reviewed with respect to the following current best practice guidance:

- CIEEM (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.3 updated September 2024. Chartered Institute of Ecology and Environmental Management, Winchester;

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- CIEEM (2019) Ecological Impact Assessment Checklist (as relevant to Irish legislation);
- EPA (2022) Guidelines on the information to be contained in environmental impact assessment reports;
- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC;
- EC (2021) Assessment of plans and projects in relation to Natura 2000 sites. Methodological guidance on Article 6(3) and 6(4) of the Habitats Directive 92/43/EC; and
- EC (2020) Guidance document on wind energy development and EU nature legislation.

ISSUES RAISED

I have had regard to submissions related to ornithology and AA matters and have summarised the key issues raised below. My appraisal has also considered the additional information provided in the Applicant's response to submissions.

STATUTORY SUBMISSIONS

Development Applications Unit (DAU) / National Parks and Wildlife Service (NPWS) / Department of Housing, Local Government and Heritage (DHLGH)

The DAU, NPWS and DHLGH made the following comments regarding the Development:

- The ecological value of the bird assemblage is undervalued in the EIAR;
- The conclusion in the EIAR that impacts on hen harrier will be negligible due to no evidence of nests despite numerous observations over the study period requires further assessment. Dawn/dusk surveys and nest search effort were not sufficient to rule out the possibility of breeding hen harrier;
- Further assessment required for impact on kestrel as the Department considers it to be potentially significant;
- Insufficient survey data to inform collision-risk and disturbance assessments for barn owl, merlin, sparrowhawk, short-eared owl and white-tailed eagle;
- The Development may cause a barrier effect and increase collision risk for waterfowl and waders travelling between the Cloonkett/Glenconaunmore wetland habitats and Gortglass/Cloonsnaghta Loughs. Geese and swan sensitivity is not reflected in the impact conclusions; and
- The limitations outlined in the EIAR may render some of the conclusions uncertain.

Clare County Council

Clare County Council (the Council) expressed concerns over the conclusion that hen harrier will not be affected by the Development despite numerous records of the species during the surveys. The Council also noted that the in-combination and cumulative effects on hen harrier from the Development and nearby developed wind farms has not been properly assessed from the perspective of it being an Annex I listed species.

The Council noted the importance of blanket bogs and loughs in proximity to the Development which are used by avian species associated with the Shannon Estuary Special Area of Conservation (SAC) and the Lower River Shannon Special Protection Area (SPA).

PUBLIC SUBMISSIONS

General concerns regarding avian ecology included the following:

- Impacts on hen harrier, marsh harrier, curlew, merlin, barn owls;
- Incomplete survey coverage of area;
- Insufficient survey effort to accurately assess avian baseline or impacts; and
- Lack of flightline mapping, barrier effect analysis and cumulative collision risk assessment.

EXAMINATION OF THE EIAR

ROBUSTNESS OF ASSESSMENT METHODS

The assessment of impacts of ornithological receptors follows the latest CIEEM Guidelines for Ecological Impact Assessment (2018). The impacts on avifauna assessed in the EIAR and the Applicant's Response to Submissions are in line with good practice.

The collision risk modeling (CRM) followed the best practice guidance on assessing collision risk available at the time of the assessment (SNHY, 2017) and uses the Band Model. The calculations are presented in text form in Appendix 9.3 of the EIAR. The CRM excel spreadsheets were not submitted alongside the EIAR and so it was not possible to check the underlying calculations and formula in detail.

FIELD SURVEY RESULTS AND EVALUATION OF CONSERVATION IMPORTANCE

The survey methods set out in Chapter 9 of the EIAR and Appendix 9.3 reference best practice guidance, including Scottish National Heritage (SNH) bird survey guidance for onshore wind farms (SNH, 2017) as well as individual survey methods for different survey types.

In their submission to the EIAR, DHLGH raised concerns about the survey effort and coverage undertaken to inform the EIA. The Applicant addressed these concerns in their response to submissions, stating that limitations relating to survey effort for site walkovers, dusk surveys and wider area breeding bird of prey surveys related to surveys in 2021 and 2022. However, having reviewed the Applicant's response, and the methods set out in Appendix 9.3 and survey coverage maps, I believe there are still limitations relating to surveys undertaken in 2023 and 2024. Survey coverage of breeding bird surveys within 500m of the turbine array area show limited transect coverage of the survey area in 2023 (Appendix 9.3 Figure 9). Breeding bird surveys of the turbine array area and 500m buffer in 2023 and 2024 also missed the earlier part of the breeding season with the first visit in 2023 undertaken in May and the first visit in 2024 undertaken in June. The results reflect these limitations, with numbers of individuals of many species being much higher in 2024 when more of the site was covered, and number of individuals dropping off sharply after the first visit in both 2023 and 2024 as breeding activity decreases. However, breeding bird survey data from 2024 suggests that the breeding assemblage of Red and Amber birds recorded in 2023 is relatively representative of the site, even if numbers are lower in 2023.

No maps are provided showing which areas could not be accessed for the hinterland breeding raptor surveys (2km buffer shown in Appendix 9.3 Figure 13), although the limitations section acknowledges that surveys could only be carried out on lands where permission had been granted. Submissions from members of the public note that they were not asked for

permission for survey access. The limitations state that areas were covered using vantage point watches and scanning from publicly accessible lands, which may or may not have provided sufficient coverage. Flight activity surveys, however, provide additional survey effort and would be expected to identify breeding activity within the surveyed area if breeding raptors were present.

Vantage point surveys in 2022 and 2023 were undertaken simultaneously from five separate viewsheds, with the 2 km viewsheds from four of the vantage points (VPs) overlapping with surveyors positioned at other VPs. Although viewsheds used for analysis were reduced to remove areas overlapping with other VPs, disturbance may well still have occurred within viewsheds due to the presence of other surveyors (SNH, 2017).

CONTEXT

The site supports a range of lowland habitats including agricultural fields, grasslands, raised bog, including large areas of cut over bog, conifer plantation, scrub and hedgerows.

BASELINE

The site supports a relatively diverse assemblage of birds, dominated by passerine species. Eight Annex I-listed species were recorded during baseline surveys. Nine Birds of Conservation Concern Ireland Red List and 23 Amber List species were recorded during baseline surveys. The closest designated site is Gortglass Lough Proposed Natural Heritage Area located approximately 200m south of the project site, and the River Shannon and River Fergus Estuaries SPA is located approximately 3.3km southeast of the project site.

POTENTIAL EFFECTS

Table 1 summarizes the impact assessment presented in the EIAR.

TABLE 1 ORNITHOLOGY: SUMMARY OF IMPACT ASSESSMENT (CHAPTER 9)

Ornithological Feature	**Phase**	**Potential Direct, Indirect and Cumulative Effects**	**Residual Effects**
All	Do-nothing scenario	Under the do-nothing scenario, existing land management practices would continue. The current bird assemblage supported by the site would likely continue to be supported, albeit with the quality of much of the peatland habitat which supports them continuing to slowly degrade.	Not significant
Golden Plover	Construction	**Direct**: None **Indirect**: Potential for water pollution events resulting in downstream water quality deterioration/loss of prey in the Shannon Estuary. **Cumulative**: None	Not significant
	Operation	**Direct**: Collision	

		Indirect: None **Cumulative**: None	
	Decommissioning	**Direct**: None **Indirect**: None **Cumulative**: None	None
Snipe	Construction	**Direct**: Loss of nest sites **Indirect**: Habitat loss and disturbance **Cumulative**: Habitat loss	Not significant
	Operation	**Direct**: Collision **Indirect**: Displacement **Cumulative**: Displacement	
	Decommissioning	**Direct**: None **Indirect**: None **Cumulative**: None	None
Curlew	Construction	**Direct**: None **Indirect**: Disturbance and potential for water pollution events resulting in downstream water quality deterioration/loss of prey. **Cumulative**: None	Not significant
	Operation	**Direct**: None **Indirect**: Disturbance **Cumulative**: None	
	Decommissioning	**Direct**: None **Indirect**: None **Cumulative**: None	None
Grey heron	Construction	**Direct**: None **Indirect**: Habitat loss, disturbance and potential for water pollution events resulting in downstream water quality deterioration/loss of prey. **Cumulative**: None	Not significant
	Operation	**Direct**: Collision risk **Indirect**: Habitat loss and disturbance **Cumulative**: None	

	Decommissioning	**Direct**: None **Indirect**: None **Cumulative**: None	None
Gull species (Herring gull, lesser black-backed gull, black-headed gull)	Construction	**Direct**: Habitat loss **Indirect**: Disturbance **Cumulative**: None	None
	Operation	**Direct**: None **Indirect**: None **Cumulative**: None	
	Decommissioning	**Direct**: None **Indirect**: None **Cumulative**: None	
Kestrel	Construction	**Direct**: Loss of nest sites **Indirect**: Disturbance and displacement **Cumulative**: None	Not significant
	Operation	**Direct**: Collision **Indirect**: None **Cumulative**: None	
	Decommissioning	**Direct**: None **Indirect**: None **Cumulative**: None	None
Hen harrier	Construction	**Direct**: None **Indirect**: Disturbance and displacement **Cumulative**: None	Not significant
	Operation	**Direct**: None **Indirect**: None **Cumulative**: None	
	Decommissioning	**Direct**: None **Indirect**: None **Cumulative**: None	None

MITIGATION

A summary of the mitigations outlined in the EIAR Section 9.7, and accompanied by a Construction Environmental Management Plan (CEMP) and Biodiversity Management and Enhancement Plan (BMEP), include:

- Access within the Development will be restricted to the footprint of the proposed works and will only be permitted via internal access routes;
- A competent Ecological Clerk of Works will oversee all works and ensure all mitigation measures are adhered to during the construction phase of the Development;
- The mitigation hierarchy will be implemented to avoid, minimise and offset any potential likely significant adverse effects as appropriate;
- Embedded 'Design Stage' mitigation which focuses on locating infrastructure away from priority/sensitive habitats and watercourses;
- Construction will begin outside the breeding season (March to August inclusive);
- Any removal of suitable nesting habitat will occur outside of the breeding season;
- Upon removal of suitable nesting habitat, the areas will be maintained in an unsuitable nesting condition for the rest of construction;
- If vegetation clearance is required during the breeding season, the area will be surveyed in advance to confirm there are no breeding birds present, or to set up appropriate buffer zones around nesting birds;
- Any construction works to be carried out during the breeding season will be preceded by a bird survey and appropriate buffer zones around nests or territories will be set up to avoid disturbance. Particular attention will be given to sensitive bird species, and monitoring will carry on throughout the breeding season where appropriate;
- Management of 4.03 ha of wet grassland for breeding snipe, to mitigate for the loss of 5.64 ha of wet grassland under the Development footprint; and
- Two kestrel nest boxes will be provided to increase breeding success and mitigate any future collision mortality.

The NIS further outlines the following mitigation measures set out to prevent adverse effects on watercourses and downstream designated sites:

- Avoidance of sensitive avian habitats, including Annex I bog/wetland habitats used by upland and wetland bird species;
- Reduced turbine count and repositioned layout to minimise collision, disturbance, and habitat loss;
- Minimised watercourse crossings; redesigned grid route to protect downstream designated wetland/river bird habitats;
- ≥50 m buffers around all watercourses to safeguard riparian bird corridors.
- Drainage design preventing direct discharge to maintain high-quality downstream habitats for water-dependent birds;
- Strict timing restrictions (no in-channel works outside 1 July–30 September) to avoid disturbance to breeding birds;

- Full sediment and pollution control (settlement ponds, silt fencing, traps) to prevent water-quality impacts affecting bird foraging areas;
- Careful peat/soil handling to avoid hydrological changes to bog/wetland habitats;
- Rapid re-vegetation of disturbed ground to restore habitat and reduce erosion risk; and

  Water quality monitoring, including continuous turbidity monitoring, to protect downstream designated habitats supporting avian qualifying interests.

RESIDUAL EFFECTS

With the identified mitigation measures in place, the EIAR predicts no significant effects on any avian receptors. DHLGH raised concerns about the assessment of impacts on hen harrier, kestrel, other raptor species (barn owl, merlin, sparrowhawk, short-eared owl and white-tailed eagle), as well as waterfowl and waders. The Applicant's response to submissions provided additional assessment or discussion relating to each of these issues, and confirmed the findings of the assessment as there being no residual significant effects. Discussion on the assessment of effects on these receptors is presented below.

ANALYSIS, EVALUATION AND ASSESSMENT: DIRECT AND INDIRECT EFFECTS

For hen harrier, although there were limitations in the surveys undertaken, I agree with the Applicant's assessment that it is unlikely that hen harrier have bred on the wind farm site during the period when surveys have been undertaken. Additional analysis and assessment of the hen harrier flight activity recorded on site during the breeding season is provided in the Applicant's response to submissions. This indicates that the majority of flight activity was recorded later in the breeding season and is unlikely to relate to locally breeding birds. However, it appears that birds have been recorded during flight activity surveys during the earlier part of the breeding season and may relate to birds breeding in the wider area. The predicted collision risk is however low, and no significant effects are predicted. Although some displacement may occur during operation, there is abundant alternative suitable foraging habitat in the wider area.

For kestrel, the EIAR predicts a pre-mitigation effect from operational collision mortality of low significance at a national level. Mitigation measures are proposed to offset mortality through the provision of nest boxes, with monitoring undertaken to determine the success of this mitigation. Assuming nest boxes are placed sufficiently far from the project site they do not increase flight activity and collision risk, and that monitoring includes adaptive management measures to require additional mitigation if collision mortality is higher than predicted, I agree that residual effects will be not significant.

The EIAR assesses the impacts of other raptor species, with information on each species also presented in the Applicant's response to submissions. Although limitations in survey effort and coverage of some surveys have been noted, taking the results of all surveys together (including flight activity surveys), and with mitigation measures in place to avoid impacts on breeding raptors, the assessment presented is considered to be adequate.

In relation to potential effects on wintering waterfowl and waders, the Applicant's Response to Submissions provides additional assessment of these groups, both as individual species, and in relation to the River Shannon and River Fergus Estuaries SPA (see Section 2). The additional assessment includes consideration of potential disturbance and displacement, collision morality

and barrier effects. The information provided presents additional justification for the assessment findings presented in the EIAR.

A cumulative assessment was undertaken and is presented in Chapter 9 of the EIAR. Additional assessment of cumulative impacts on hen harrier is presented in the Applicant's response to submissions. Additional commentary on the cumulative assessment is presented in Section 2 below.

CONCLUSION: DIRECT AND INDIRECT EFFECTS

Having regard to the information presented in the EIAR and the Applicant'

s response to submissions, I consider that the direct, indirect and cumulative effects of the proposed development have been adequately assessed, and that with mitigation measures in place significant effects will not occur on ornithological receptors.

REASONED CONCLUSION FOR ORNITHOLOGY

Overall I consider that, despite instances of survey effort and coverage not being aligned with best practice, the Applicant has adequately addressed and considered issues related to ornithology based on knowledge of the site from existing published sources and collected over a number of years of bird survey.

Issues of concern raised in submissions have been addressed by the Applicant through their response to submissions.

I consider that the information provided allows for an adequate assessment and that with mitigation measures in place the proposed development will not result in significant impacts on bird species.

SECTION 2 – TECHNICAL NOTE ON ORNITHOLOGY TO INFORM THE APPROPRIATE ASSESSMENT

ARTICLE 6(3) OF THE HABITATS DIRECTIVE

The requirements of Article 6(3) as related to AA of a project under part XAB of the Planning and Development Act 2000 (as amended) are considered in this section. This section does not comprise the AA but serves to assist the Inspector and the Commission in their assessment.

ROBUSTNESS OF SCREENING METHODOLOGIES

The project is not connected with or necessary for the management of any European Sites and is therefore subject to AA screening.

The screening stage examines the likely effects of a project either alone, or in combination with other projects and plans on a European site and seeks to answer the question "can it be concluded that no likely significant effect will occur?", in view of the site's conservation objectives.

The proposed development does not overlap with any European Sites. The closest European site is the Lower River Shannon SAC, approximately 1.6km west of the project site. The closest European site designated for ornithological interest is the River Shannon and River Fergus Estuaries SPA, located approximately 3.3km southeast of the project site.

The AA Screening and NIS Report prepared on behalf of the Applicant uses the source-pathway-receptor model to identify potential impacts of the project on European Sites, within the site's Zone of Influence (ZoI). The AA Screening section of the report provides some discussion around the ZoI applied for ornithology but does not define it, however a 15km buffer is shown in Figure 4. This ZoI is appropriate for the species discussed in the AA Screening section.

Two SPA sites were identified within 15km of the project site:

- The River Shannon and River Fergus Estuaries SPA; and
- Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA, located approximately 13.9 km south of the project site.

The Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA is designated for its breeding hen harrier population. The project site is beyond the accepted 2km core connectivity distance for hen harrier and the potential for likely significant effects on the SPA is ruled out.

The AA Screening section of the report screened in impacts on wetland habitat which support the bird interest features of the River Shannon and River Fergus Estuaries SPA through hydrological connectivity but screened out impacts on all qualifying bird interest features of SPA, despite seven species from the SPA being recorded during baseline surveys for the project.

The potential impact pathways identified that could lead to likely significant effects on the wetland habitats of the River Shannon and River Fergus Estuaries SPA are emissions to water and the spread of invasive alien species. The Applicant considers that in the absence of mitigation these impacts could lead to a likely significant effect which could undermine the conservation objects of the River Shannon and River Fergus Estuaries SPA.

ROBUSTNESS OF SCREENING CONCLUSIONS

Having regard to the information presented in the AA Screening and NIS Report, including the nature, size and location of the project and likely effects during all stages of the Development, the source-pathway-receptor model and sensitivities of the ecological receptors, I consider that the Applicant has incorrectly screened out the potential for likely significant effects on individual bird qualifying features of The River Shannon and River Fergus Estuaries SPA.

The omission of screening in the potential for likely significant effects on individual bird qualifying features of the River Shannon and River Fergus Estuaries SPA is addressed through additional information provided in the Applicant's Response to Submissions for the individual species but is not presented as an update to the AA Screening process or NIS report.

I am satisfied that there is no likely significant effect on the Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA.

SUMMARY OF THE NATURA IMPACT STATEMENT

The NIS Report sets out the conservation objectives of the Wetlands and Waterbirds features of the River Shannon and River Fergus Estuaries SPA. There is a section on the potential impacts from the project that may result in an adverse effect on the site integrity of the SPA in relation to its conservation objectives. This section identifies the accidental release of pollutants and

the introduction of invasive alien species as potentially affecting the species' composition and habitat condition of habitat qualifying interest features.

The NIS Report sets out a wide range of mitigation measures, including embedded mitigation, construction phase mitigation and operational phase mitigation relating to mitigating impacts on water quality. Embedded mitigation measures include siting of project infrastructure and works away from watercourses, minimising the number of watercourse crossings, designing site drainage to prevent sediment and pollution from entering receiving watercourses.

The NIS Report includes a section on Collision Risk, despite not screening collision risk in as having the potential for resulting in a likely significant effect. The section states that there is no collision risk to any of the bird species which are qualifying interest features of the River Shannon and River Fergus Estuaries SPA. Construction and operation mitigation includes regular checking of machinery for leaks and presence of alien invasive species, checking construction materials for invasive species, storage of contaminants in bunded compounds away from watercourses and spill management. The proposed mitigation measures include a number of specific plans to avoid impacts and restore habitats including a CEMP, an Aquatic Habitat Management and Enhancement Plan, a Surface Water Management Plan, a Peat and Spoil Management Plan and a BEMP. The Applicant's Response to Submissions provides additional detail on mitigation measures to avoid and reduce impacts on receiving watercourses.

An in-combination assessment is presented in the NIS Report which identifies other developments which could act in-combination with the project, out to 20km. The section includes an assessment of four of these projects, as well as identifying 15 wind farms within 20km of the project. The assessment states that there is no hydrological connectivity between these developments and the watercourses impacted by the project as the AA Screening section of the report screened out likely significant effects of the project on SPA bird species from collision mortality, therefore the in-combination assessment does not assess in-combination collision mortality.

Following the assessment, the Applicant determined that, with the proposed mitigation measures in place, the project would not adversely affect the integrity of any European Site either alone or in combination with any other plan or project.

ROBUSTNESS OF APPROPRIATE ASSESSMENT METHODOLOGIES

The NIS assesses impacts on the River Shannon and River Fergus Estuaries SPA from hydrological aspects, using the same methods and assessment as used to assess impacts on the Lower River Shannon SAC. As such, I have not provided detailed comment on the suitability of the methods, which are addressed in the response on ecology. Although screened out in the AA Screening, the NIS identifies collision risk as a potential impact, but no assessment is presented.

The Applicant's EIAR considers impacts from habitat loss, collision mortality, disturbance and displacement and collision risk of qualifying bird features of the River Shannon and River Fergus Estuaries SPA recorded during baseline surveys. The methods for these assessments are appropriate, including use of the Band Model for collision risk modelling. There are some uncertainties associated with the results of some of the baseline surveys undertaken (See Section 1) due to the number or timing of visits not being fully aligned with best practice guidance. However, based on the results of the survey which were undertaken (which included

a greater number of years/seasons than the minimum required by SNH / NatureScot guidance), I consider it unlikely that these uncertainties have undermined the assessment of impacts. The EIAR does not specifically relate the assessment of impacts on potential River Shannon and River Fergus Estuaries SPA to whether there will be a likely significant effect or adverse effect on the integrity of the SPA.

DHLGH raised concerns regarding how the ornithological findings were summarised in the EIAR and NIS, and the manner in which value has been attributed to the identified.

The Applicant's Response to Submissions addresses this concern and includes additional assessment of the impacts on the River Shannon and River Fergus Estuaries SPA. The Response to Submissions confirms that seven qualifying interest feature species of the River Shannon and River Fergus Estuaries SPA were recorded during baseline surveys and could be impacted by the project. Three of these species (whooper swan, teal and lapwing) occurred in very low numbers, and the project would not result in an adverse effect on the integrity of the SPA. This is based on very low levels of flight activity, and the lack of evidence of the project site being an important foraging area for SPA populations.

For four species (cormorant, curlew, golden plover and black-headed gull) more detailed assessment is presented, including discussion on the seasonal use of the project site and for cormorant, golden plover and black-headed gull, the results of collision risk modelling. The additional assessment presented in the Applicant's Response to Submissions is not presented as an update to the NIS and does not re-screen for impacts on the River Shannon and River Fergus Estuaries SPA. However, I am satisfied that, based on the information presented across the EIAR, NIS and the Applicant's Response to Submissions, sufficient information has been provided to demonstrate that the project will not undermine the conservation objectives for the River Shannon and River Fergus Estuaries SPA.

ASSESSMENT OF CUMULATIVE EFFECTS

The AA Screening and NIS includes an in-combination assessment that assessed cumulative effects of the project with other developments. In line with the likely significant effects screened into the NIS, the in-combination assessment focusses on cumulative impacts to water quality and hydrology. In this regard, I believe the findings of the in-combination assessment are robust and, with mitigation measures in place, there will be no in-combination effects on any European Sites.

As collision risk to SPA bird species was screened out at the AA Screening stage, the NIS does not include an in-combination assessment of cumulative collision morality impacts, although it does list 14 wind farms (10 operational, 4 consented) within 20km of the project.

The Applicant's Response to Submissions does not include any additional in-combination assessment for either the River Shannon or River Fergus Estuaries SPA. However, the predicted collision mortality for the qualifying interest bird species of the site from the project is sufficiently low so I am satisfied that in-combination collision impacts will not occur.

ROBUSTNESS OF APPROPRIATE ASSESSMENT CONCLUSIONS

The AA Screening and NIS Report have a number of omissions in relation to the European Sites screened in, and the identification of likely significant effects identified and taken forward for inclusion in the NIS. However, information is included in the EIAR and, in particular, in the Applicant's Response to Submissions which provides additional information and assessment to

allow the Board to reach complete, precise and definitive findings as part of the AA of the implications of the project on the integrity of the River Shannon and River Fergus Estuaries SPA in view of the conservation objectives of the site.