

Re: Bord Pleanála Case reference: PA17.319448

Date: 23-05-2024

Submission of Triona Ní Fhionnáin, Annagh, Oldcastle, Co.Meath

Greenland white-fronted geese

The applicant has not fully considered the potential negative effects on this Birds Directive, EU Annex I species.

Satellite locational data, incidentally collected as part of a study¹ regarding Greenland white-fronted geese in Ireland and Britain indicates that it is likely that a substantial portion of this species, which overwinter in Wexford, use a route across the Irish midlands on migration to and from Iceland (before flying onto Greenland where they breed). Please see Figure 1 in the report¹ which shows roughly the migration movement paths across the country using colour coded dots.

This species has been discounted in the ecological assessments as being at risk from the proposed development, citing lack of daytime sightings of flocks of migrating geese. This satellite data would be far more informative than data obtained from vantage point surveys which can only provide a snapshot of activity within and over the proposed site. Also the VP surveys do not cover the night-time period when approximately 30% of migratory flights take place.

With no other technology used to ascertain migratory flights over the proposed site, the proposed developer should be requested to seek from the NPWS, the location/ altitude/ nocturnal migration information which it holds, as a result of the aforementioned study.

It is essential that this data is fully considered and that potential impacts including possible collisions, are identified and that a post construction and operational phase monitoring plan and mitigation are proposed.

¹Schindler AR, Fox AD, Wikle, CK, Ballard, BM, Walsh AJ, Kelly SBA, Cao L., Griffen LR, Weegman MD. 2024. Energetic trade-offs in migration decision-making, reproductive effort and subsequent parental care in a long-distance migratory bird. Proc. R. Soc. B 291:20232016. See <https://royalsocietypublishing.org/doi/10.1098/rspb.2023.2016>

Birds- General

The proposed mitigation measures during operation phase only relate to those identified as IEF species and those which have been shown during the 3 year proposed monitoring programme to be affected significantly. Therefore, should any significant issues arise following the 3 year post monitoring period, there will be no way the Planning Authority or any other public authority can enforce appropriate mitigation such as turbine curtailment on the IEF bird species.

It further appears that any significant impacts on other species (excluding IEF species), including Greenland white-fronted geese, arising at any time post construction/ operational phase, cannot be addressed.

Therefore, post operational monitoring conditions would be required to allow the Planning Authority to make appropriate subsequent requirements of the developer/ operator.

Woodcock

Given the lack of breeding sites and the significant decline in breeding number of this species, it is unacceptable that the wet woodland habitat where it was found breeding is to be mostly destroyed to accommodate Turbine 3. There is no guarantee that the proposed compensatory habitat will have the exact conditions required to attract this species.

Turbines 1, 2 and 3

Turbines 1, 2 and 3 should be excluded from the proposed development given their proximity and hydrological connections to the River Boyne and River Blackwater Special Area of Conservation (002299). Any risk here is totally unacceptable especially as parts of the downstream river system support salmon spawning habitat.