

4.2 Department of Defence

The Department of Defence (DoD) in its submission noted that the Air Corps were consulted in preparation of its response.

The DoD sets out the following conditions in the event that the Proposed Project is granted:

- All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. Obstacle lighting may be incandescent. If LED or other lighting types are used, should be a type visible to Night Vision equipment. Obstacle lighting must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light insensitively to be of similar value to that emitted in the visible spectrum of light.
- In the event of negative impacts on future military radar systems, the owner will engage with the Department of Defence and will provide suitable mitigations as soon as practical.

The Applicant acknowledges the aviation safeguarding conditions set out by the DoD and confirms that they are agreeable to these conditions, in the event that the Proposed Project is granted planning permission.

4.3 Development Applications Unit

The Development Applications Unit (DAU) made a submission on the planning application for the Proposed Project in relation to both Archaeology and Nature Conservation. These matters are addressed separately below.

4.3.1 Archaeology

The DAU note that previously unknown sub-surface archaeological features or deposits may be present within the Site and recommends that appropriate conditions relating to archaeological investigation, monitoring and mitigation are implemented by the Commission, in the event that planning permission is granted.

The Applicant acknowledges the conditions set out by the DAU with respect to Archaeology, which are consistent with the archaeological mitigation strategy set out in Chapter 14 of the EIAR and is agreeable to appropriate conditions being imposed by the Commission, in the event that the Proposed Project is granted planning permission.

4.3.2 Nature Conservation

4.3.2.1 White Tailed Eagle

The DAU note that white-tailed sea eagle were recorded near the Wind Farm Site and note several casualties along the Kerry/Cork border. The DAU note concern that the Proposed Wind Farm may give further rise to the risk of collision for the species.

Response

While it is acknowledged that white-tailed eagle collisions have occurred in the State and that the species may be more susceptible than some other species to collisions, site-specific factors are likely to be more pertinent (e.g. occurrence locally and suitability of habitats) in the consideration of likely significant effects.

In the present case, there was a very low rate of occurrence throughout surveying, and the commercial forestry of the Site is of only limited value to the species (the species roost in commercial forestry on occasion, although there was no evidence of that here).

The risk of colliding with a turbine decreases/increases with the amount of time spent in the air within the rotor swept area of a turbine. White-tailed eagle was not recorded with any regularity at the Site. As outlined in Section 7.5.5.4 of the EIAR, in the 3 years of surveys that informed this planning application (April 2022 to March 2025), there were only 2 no. observations of white-tailed eagle. Both observations were greater than 500m from the proposed turbines, one flying approximately 750m and one soaring high approximately 3.2km from the Proposed Wind Farm site. Because of the absence of flights within the Proposed Wind Farm site, it was not possible to calculate a formal estimate of predicted collisions, however, White-tailed eagles were not found to be utilising the Proposed Wind Farm site and no suitable breeding sites are present.

In summary, throughout the comprehensive suite of bird surveys undertaken, spanning April 2022 to March 2025, there is no evidence of white-tailed eagle flight activity that would suggest that collisions are likely to pose a significant risk to this species resulting from the Proposed Project, or that the area in which the Proposed Wind Farm site is located provides attractive thermals or corridors for travelling and hunting.

No significant effects are predicted.

4.3.2.2 **Annex I and Article 17 Habitats**

The Department highlighted that proposed turbines and supporting infrastructure occur within annexed habitats under the EU Habitats Directive (HD). It is highlighted that the State has responsibilities under Article 17 of the HD to report details of losses and degradation to Article 17 mapped habitat.

Response

Impacts on Article 17 Habitats

The potential for impacts on habitats mapped and reported to the European Commission by the State under Article 17 of the HD has been fully assessed in the EIAR. There are Article 17-mapped habitats within the EIAR site boundary as shown in Figure 6-3 of the EIAR. An area of alpine/subalpine heath 4060 is mapped within the vicinity of T7 and T8 within the south of the site. However, as demonstrated in Section 6.3.1.2, Chapter 6, of the EIAR, this area actually comprises a conifer plantation and does not conform to Annex I habitat. The Proposed Wind Farm completely avoids all other mapped areas of Article 17 habitat and as such there is no potential for loss of or degradation of Annex I habitats reported by the State to the European Commission.

Impacts on other Annex I Habitats

The potential for impacts on other Annex I habitats not reported on under Article 17 as a result of the Proposed Project has been fully assessed in the EIAR. The potential impact as a result of direct loss of 1.6ha of Annex I wet heath and 0.2ha of Annex I blanket bog has been fully assessed in Table 6-12 of the EIAR. As reported, there will be loss of 1.6ha of degraded wet heath which will be offset through the implementation of the Biodiversity Management and Enhancement Plan (BMEP), Appendix 6-4 of the EIAR. There will be a residual loss of 0.2ha of unmapped blanket bog habitat which has not been mapped or reported under Article 17. This assessment has also included the potential for impacts due to proposed spoil management areas which will be located at proposed turbines T10, T09, T08, T07 and T01 within what is currently conifer plantation forestry, and which will not result in the loss of Annex I habitat.

The potential for indirect impacts on Annex I wet heath and blanket bog habitat (unreported under Article 17) as a result of indirect drainage impacts (eg from construction and upgrade of new roads) as well as impacts from construction phase dust has also been assessed in Table 6-12 (Chapter 6) of the EIAR, with mitigation prescribed to ensure there is no potential for residual significant indirect effects on these habitats. The potential for impacts on peatland habitats due to peat slippage has been fully assessed in Chapter 8 ‘Land, Soils and Geology’ of the EIAR with a Geotechnical and Peat Stability Assessment Report included as Appendix 8-1.

Annex I Bird Species and Red-Listed Bird Species

The DAU raises concern over several Annex I and Red Listed Species that were identified during the surveying period for the Proposed Wind Farm site, including Chough, Golden Plover, Kestrel, Common Snipe, Breeding Woodcock, Wintering Merlin, Curlew, Hen Harrier, Ring Ouzel, Whooper Swan, Goshawk, Goldeneye, Grey Wagtail, Redwing, Swift, Peregrine Falcon and Stock Dove

In response, and as outlined in Section 7.2.4.3 of the EIAR, the key potential sources of impacts from this type of development are summarised as follows. Wind farms present three potential risks to birds (Drewitt and Langston 2006, 2008; *Band et al.*, 2007):

- **Direct habitat loss** due to wind farm infrastructure.
- **Disturbance/displacement** (sometimes called indirect habitat loss) if birds avoid the wind farm and its surrounding area due to construction works or turbine operation. Displacement may also include barrier effects in which birds are deterred from using normal routes to feeding or roosting grounds.
- Death through **collision** or interaction with turbine blades and other infrastructure.

For each of these three risks, the detailed knowledge of bird distribution and flight activity within and surrounding the Project has been used to predict potential impacts of the Proposed Project on birds. These impacts are also assessed cumulatively with other projects.

A comprehensive suite of bird surveys was undertaken at the Proposed Wind Farm Site between April 2022 and March 2025. Results derived from a continuous 2 years and 11 months of surveying at the Site and hinterland, undertaken in line with best practise, i.e. NatureScot guidance², were analysed to inform this assessment. As such, the surveys undertaken provide the information necessary to allow a complete, comprehensive and robust assessment of the potential impacts of the Proposed Project on avian receptors. These best practice surveys are the scientific basis for the impact assessment that followed.

EIAR Section 7.5.2 provides an outline of the rationale for identifying the key ornithological receptor (KOR) of the Proposed Wind Farm site for detailed impact assessment. Whether the species was listed on Annex I of the Birds Directive and/or Red-listed (BoCCI) was a key consideration in this regard. The impact assessment that follows in EIAR Section 7.5.5 provides a detailed species-specific impact assessment of the construction, operation and decommissioning phases. This includes consideration of direct (physical) and indirect (e.g. disturbance and displacement) habitat loss and collision risk effects associated with the Proposed Project. Key considerations included:

- Large sections of the Proposed Wind Farm site is characterised primarily by commercial forestry. Commercial forestry is typically considered to be of low ecological value;
- The rate of occurrence of the receptor (informed by a comprehensive suite of surveys);
- Context: The suitability and abundance of habitat on site relative to the wider surroundings;

² As outlined in Section 7.2.6.1 of the EIAR, surveys were undertaken in line with the NatureScot Guidance of the time (SNH, 2017). Following the completion of these surveys, updated survey Guidance was published by NatureScot (i.e. SNH, 2017; revised in NatureScot, 2025). The surveys are also in accordance with the revised Guidance (NatureScot, 2025).

- The pathway for impacts;
- Conservation status of the population; and
- Population importance.

The balance of this evidence informed a comprehensive and robust impact assessment. As outlined in Section 7.6.3 of the EIAR and reiterated herein, no significant effects were identified for any KOR.

In summary, the comprehensive suite of surveys provided the scientific basis to undertake a meaningful examination of likely significant effects. This impact assessment included consideration of habitat loss (direct and indirect) and collision risk for the avian community of the Site and wider surroundings. No significant effects were identified.

4.3.2.3 Cumulative Effects

The DAU raises concern over the level of detail provided on in-combination effects and cumulative impacts from the other wind farms in the cumulative assessment. The below provides additional species-specific detail and assessment of cumulative effects for each of the Key Ornithological Receptors, including information on collision risk estimates for other wind farms where it is available.

Chough

At a national level, the main pressures and threats for chough listed in Article 12 reporting are: conversion from mixed farming and agroforestry systems to specialised production, conversion from one type of agricultural land use to another, and abandonment of grassland management; as well as use of plant protection chemicals in agriculture. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for chough. All of the pressures/threats listed were ranked as of medium importance.

The extent of commercial forestry in the landscape influences the availability and distribution of open habitat for chough. Afforestation reduces the extent of open foraging habitat. Ballybane, Carrigarierk Extension, Carrigarierk, Cleanrath, Cummeenabuddoge, Curraglass, Derragh, Gortyrhilly, Inchamore, Killaveenoge, Knocknamork, Shehy More and Sillahertane-Coomagearlachy II are all located within, or partially within, commercial forestry.

The intensity and type of agricultural activity can affect habitat suitability for chough (e.g., through changes in grazing pressure, vegetation structure and levels of human disturbance). Barnadivane, Coomatallin, Garranereagh, Kilvinane, Lahanaght Hill, and Reenascreena are all located within, or partially within, agricultural grassland habitats.

Upland open habitats are of value to chough. Ballybane, Barnadivane, Cleanrath, Clydraghroe, Coomatallin, Dreenacreenig West, Gortloughra, Gortyrhilly, Grousemount, Kilgarvan II, Kilgarvan Repowering, Kilgarvan, Knocknamork, Midas, Milane Hill, Shehy More and Sillahertane-Coomagearlachy II are located within, or partially within, upland habitats (bog/wet grassland).

Information on collision risk at other wind farms was available for Gortyrhilly, which predicted 0.23 collisions per year, and Gortloughra, which predicted 0.06. Combined with the Proposed Project, this is a cumulative 0.392 birds per annum. If 0.392 were to occur per annum, this would increase the annual mortality of the county population by 1.37%. The magnitude of the effect is assessed as low, which corresponds to a Low effect significance.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on chough are anticipated at the county, national or international scale.

Hen Harrier

At a national level, the main pressures and threats for hen harrier listed in Article 12 reporting are: conversion to forest from other land uses, or afforestation; replanting with or introducing non-native or non-typical species; wood transport; removal of small landscape features for agricultural land parcel consolidation; reseedling of grasslands and other semi-natural habitats; conversion from one type of agricultural land use to another; burning for agriculture; abandonment of management/use of other agricultural and agroforestry systems; and wind, wave and tidal power, including infrastructure; as well as problematic native species. The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for hen harrier. The pressures/threats of wind, wave and tidal power and agricultural are ranked as of medium importance. Conversion to forest from other land uses, or afforestation, and replanting with or introducing non-native or non-typical species were ranked as of high importance, with the remaining pressures/threats relating to forestry and agricultural practices ranked as of medium importance.

Commercial forestry habitats are of limited value to hen harrier except during the pre-thicket stage (approximately the first ten years of growth) when they can be used by hunting and nesting birds. Some areas of forestry in the landscape may naturally become unsuitable for this species over the lifetime of the Proposed Project due to the maturation of commercial forestry. However, due to the regular cycles of commercial forestry, additional areas are likely to also be felled within the landscape, and as such new potential suitable habitat would become available. Ballybane, Carrigarierk Extension, Carrigarierk, Cleanrath, Cummeenabuddoge, Curraglass, Derragh, Gortyrhilly, Inchamore, Killaveenoge, Knocknamork, Shehy More and Sillahertane-Coomagearlachy II are all located within, or partially within, commercial forestry.

The intensity and type of agricultural activity can affect habitat suitability for hen harrier (e.g., through changes in prey availability, grazing pressure, vegetation structure and levels of human disturbance). For example, drainage, reseedling and improvement may reduce habitat suitability in some areas, while low-intensity grazing systems may maintain suitable foraging habitat. Barnadivane, Coomattallin, Garranereagh, Kilvinane, Lahanaght Hill, and Reenascreena are all located within, or partially within, agricultural grassland habitats.

Open upland habitats are of value to hen harrier. Ballybane, Barnadivane, Cleanrath, Clydraghroe, Coomattallin, Dreenacreenig West, Gortloughra, Gortyrhilly, Grousemount, Kilgarvan II, Kilgarvan Repowering, Kilgarvan, Knocknamork, Midas, Milane Hill, Shehy More and Sillahertane-Coomagearlachy II are located within, or partially within, upland habitats (bog/wet grassland).

Information on collision risk at other wind farms was available. The predicted number of collisions per annum were: 0.001 at Cummeenabuddoge, 0.003 for Gortyrhilly, 0.004 for Gortloughra, 0.00171 for Cleanrath and 0.001 for Carrigarierk Extension. Predicted values were not calculated for Knocknamork and Shehy More due to the low level of flight activity. Combined with the Proposed Project, this is a cumulative 0.012 birds per annum. If 0.392 were to occur per annum, this would increase the annual mortality of the wintering county population (estimated to be 3 birds) by 2.11%. The magnitude of the effect is assessed as low, which corresponds to a Low effect significance.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on hen harrier are anticipated at the county, national or international scale.

Peregrine Falcon

At a national level, the main pressure/threats for peregrine falcon listed in Article 12 reporting are: wind, wave and tidal power, including infrastructure; agricultural activities (which relates to changes in habitat extent and quality due to agricultural management); and use of plant protection chemicals in agriculture; as well as poisoning of animals, illegal harvesting, and other human intrusions and disturbance not mentioned above (which relates to checking nests and taking chicks for the purposes of falconry). The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which also have the potential to influence habitat availability and quality for peregrine falcon. Overall, the pressure from wind, wave and tidal power is not considered to currently be having a negative impact on the national/regional populations.

The maturation and management of commercial forestry in the landscape influences the availability and distribution of habitat for peregrine falcon. Afforestation may reduce the extent of open foraging habitat, while forest maturation further reduces habitat suitability over time. Conversely, felling and restructuring operations may periodically create temporary open habitat conditions in some areas that could be suitable for foraging. The suitability of the landscape for peregrine falcon is therefore influenced by the age structure, composition and management cycle of commercial forestry. Ballybane, Carrigariel Extension, Carrigariel, Cleanrath, Cummeenabuddoge, Curraghglass, Derragh, Gortyrally, Inchamore, Killaveenoge, Knocknamork, Shehy More and Sillahertane-Coomagearlachy II are all located within, or partially within, commercial forestry.

The intensity and type of agricultural activity can affect habitat suitability for peregrine falcon (e.g., through changes in prey availability, grazing pressure, vegetation structure and levels of human disturbance). For example, drainage, reseeding and improvement may reduce habitat suitability in some areas, while low-intensity grazing systems may maintain suitable foraging habitat. Barnadivane, Coomatalin, Garranereagh, Kilvinane, Lahanaght Hill, and Reenascreena are all located within, or partially within, agricultural grassland habitats.

Open upland habitats are of value to peregrine falcon: this species needs open area with a plentiful supply of birds to hunt and secure sites for breeding (Ratcliffe, 1993). Ballybane, Barnadivane, Cleanrath, Clydraghroe, Coomatalin, Dreenacreenig West, Gortloughra, Gortyrally, Grousemount, Kilgarvan II, Kilgarvan Repowering, Kilgarvan, Knocknamork, Midas, Milane Hill, Shehy More and Sillahertane-Coomagearlachy II are located within, or partially within, upland habitats (bog/wet grassland).

Information on collision risk at other wind farms was available. The predicted number of collisions per annum were: 0.0006 for Gortrally, 0.221 for Curraghglass, 0.03 for Gortloughra and 0.0235 for Cleanrath. Combined with the Proposed Project, this is a cumulative 0.299 birds per annum. If 0.299 collisions were to occur per annum, this would increase the annual mortality of the county population by 1.25%. The magnitude of the effect is assessed as low, which corresponds to a Low effect significance.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on peregrine falcon are anticipated at the county, national or international scale.

White-tailed Eagle

At a national level, the main pressures and threats for white-tailed eagle listed in Article 12 reporting are: wood transport; transmission of electricity and communications; agricultural activities generating diffuse pollution to surface or ground waters; and wind, wave and tidal power, including infrastructure; as well as sports, tourism and leisure activities, plant and animal diseases, pathogens and pests, and increases in precipitation due to climate change. The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a

combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for white-tailed eagle. Of the pressures/threats listed, wind, wave and tidal power is ranked as of high importance, while those relating to commercial forestry or agriculture are of medium importance.

The extent of commercial forestry in the landscape influences the availability and distribution of open habitat for white-tailed eagle. Afforestation reduces the extent of open foraging habitat, although this species also forages over water. Ballybane, Carrigariark Extension, Carrigariark, Cleanrath, Cummeenabuddoge, Curraglass, Derragh, Gortyrhilly, Inchamore, Killaveenoge, Knocknamork, Shehy More and Sillahertane-Coomagearlachy II are all located within, or partially within, commercial forestry.

The intensity and type of agricultural activity can affect habitat suitability for white-tailed eagle (e.g., through changes in prey availability, grazing pressure, vegetation structure and levels of human disturbance, as well as carrion availability). For example, drainage, reseeded and improvement may reduce habitat suitability in some areas, while low-intensity grazing systems may maintain suitable foraging habitat, although this species also forages over water. Barnadivane, Coomatalin, Garranereagh, Kilvinane, Lahanaght Hill, and Reenascreena are all located within, or partially within, agricultural grassland habitats.

Upland open habitats are of value to white-tailed eagle. Ballybane, Barnadivane, Cleanrath, Clydraghroe, Coomatalin, Dreenacreenig West, Gortloughra, Gortyrhilly, Grousemount, Kilgarvan II, Kilgarvan Repowering, Kilgarvan, Knocknamork, Midas, Milane Hill, Shehy More and Sillahertane-Coomagearlachy II are located within, or partially within, upland habitats (bog/wet grassland).

Information on collision risk at other wind farms was available for Gortyrhilly, which predicted 0.05 collisions per year. The level of flight activity at Curraghglass was too low to calculate a collision risk value.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on white-tailed eagle are anticipated at the county, national or international scale.

Kestrel

At a national level, the main pressures and threats for kestrel listed in Article 12 reporting are: use of plant protection chemicals in agriculture; conversion from mixed farming and agroforestry systems to specialised production; and removal of small landscape features for agricultural land parcel consolidation; as well as interspecific relations. The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for kestrel. The threats/pressures listed that relate to agriculture were ranked as of medium importance.

Kestrel is a habitat generalist that may use commercial forestry, agricultural and upland environments. Curraglass, and Shehy More are all located within, or partially within, commercial forestry. Dreenacreenig West and Gortloughra are located within, or partially within, upland habitats (bog/wet grassland). However forestry and open upland habitats are widespread and abundant in the landscape. Extensive areas of suitable habitat will persist after construction. Given that kestrel at the Proposed Wind Farm site was determined to be a population of Local Importance (Higher Value), this further reduces the likelihood of significant cumulative impacts at the landscape scale.

Information on collision risk at other wind farms was available. The predicted number of collisions per annum were: 1.013 for Knocknamork, 0.87 for Gortyrhilly, 0.28 for Curraghglass, 2.4 for Gortloughra and 0.28 for Carrigariark Extension. Combined with the Proposed Project, this is a cumulative 5.393 birds

per annum. If 5.393 collisions were to occur per annum, this would increase the annual mortality of the county population by 1.08%. The magnitude of the effect is assessed as low, which corresponds to a Low effect significance.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on kestrel are anticipated at the county, national or international scale.

Red Grouse

The main pressures and threats for red grouse listed in Article 12 reporting are: conversion to forest from other land uses, or afforestation; intensive grazing or overgrazing by livestock; burning for agriculture, drainage for use as agricultural land; and peat extraction; as well as change of habitat location, size, and/or quality due to climate change, other invasive alien species, and problematic native species. The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for red grouse. All the threats/pressures listed are ranked as of medium importance.

The extent of commercial forestry in the landscape influences the availability and distribution of open habitat for red grouse. Afforestation reduces the extent of open habitat. Ballybane, Carrigarierk Extension, Carrigarierk, Cleanrath, Cummeenabuddoge, Curraglass, Derragh, Gortyrhilly, Inchamore, Killaveenoge, Knocknamork, Shehy More and Sillahertane-Coomagearlachy II are all located within, or partially within, commercial forestry.

The intensity and type of agricultural activity can affect habitat suitability for red grouse (e.g., through changes in grazing pressure, vegetation structure and levels of human disturbance). For example, drainage, reseeding and improvement may reduce habitat suitability for foraging, roosting and nesting, while low-intensity grazing systems may maintain suitable habitat. Barnadivane, Coomatallin, Garranereagh, Kilvinane, Lahanaght Hill, and Reenascreena are all located within, or partially within, agricultural grassland habitats.

Upland open habitats are of value to red grouse. Ballybane, Barnadivane, Cleanrath, Clydraghroe, Coomatallin, Dreenacreenig West, Gortloughra, Gortyrhilly, Grousemount, Kilgarvan II, Kilgarvan Repowering, Kilgarvan, Knocknamork, Midas, Milane Hill, Shehy More and Sillahertane-Coomagearlachy II are located within, or partially within, upland habitats (bog/wet grassland).

The impact assessment for two other wind farms (Cummeenabuddoge and Knocknamourk) did not calculate a collision risk prediction due to low levels of flight activity, therefore no cumulative effects are predicted.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on red grouse are anticipated at the county, national or international scale.

Snipe

At a national level, the main pressures and threats for snipe listed in Article 12 reporting are: conversion to forest from other land uses, or afforestation; mowing or cutting of grasslands; intensive grazing or overgrazing by livestock; conversion from one type of agricultural land use to another; abandonment of grassland management; drainage for use as agricultural land; wind, wave and tidal power, including infrastructure; and peat extraction; as well as other invasive alien species, and problematic native species.

The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for snipe. Some of the threats/pressures relating to forestry and agriculture were ranked as of high importance (mowing or cutting of grasslands; intensive grazing or overgrazing by livestock; conversion from one type of agricultural land use to another), while the remained were ranked as of medium importance. Peat extraction, and wind, wave and tidal power were ranked as of medium importance.

The extent of commercial forestry in the landscape influences the availability and distribution of open habitat for snipe. Afforestation reduces the extent of open foraging habitat. Ballybane, Carrigariark Extension, Carrigariark, Cleanrath, Cummeenabuddoge, Curraglass, Derragh, Gortyrhilly, Inchamore, Killaveenoge, Knocknamork, Shehy More and Sillahertane-Coomagearlaghy II are all located within, or partially within, commercial forestry.

The intensity and type of agricultural activity can affect habitat suitability for snipe (e.g., through changes in grazing pressure, vegetation structure and levels of human disturbance). For example, drainage, reseeding and improvement may reduce habitat suitability for foraging, roosting and nesting, while low-intensity grazing systems may maintain suitable habitat. Barnadivane, Coomatalin, Garranereagh, Kilvinane, Lahanaght Hill, and Reenascreena are all location within, or partially within, agricultural grassland habitats.

Open upland habitats are of value to snipe. Ballybane, Barnadivane, Cleanrath, Clydraghroe, Coomatalin, Dreenacreenig West, Gortloughra, Gortyrhilly, Grousemount, Kilgarvan II, Kilgarvan Repowering, Kilgarvan, Knocknamork, Midas, Milane Hill, Shehy More and Sillahertane-Coomagearlaghy II are located within, or partially within, upland habitats (bog/wet grassland).

Information on collision risk at other wind farms was available. The predicted number of collisions per annum were: 0.006 for Curraghglass and 0.001 for Carrigariark Extension. A specific value was not provided for Gortloughra, but collision risk here was assessed to be negligible. Combined with the Proposed Project, this is a cumulative 0.009 birds per annum. If 0.009 collisions were to occur per annum, this would increase the annual mortality of the county population by 0.01%. The magnitude of the effect is assessed as negligible, which corresponds to a Very Low effect significance.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on snipe are anticipated at the county, national or international scale.

Buzzard

At a national level, the main pressures and threats for buzzard listed in Article 12 reporting are: abandonment of grassland management; as well as poisoning of animals, and illegal shooting/killing. The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for buzzard. Threats/pressures relating to agriculture were ranked as of medium importance.

Buzzard is a habitat generalist that may use commercial forestry, agricultural and upland environments. Curraglass, and Shehy More are all located within, or partially within, commercial forestry. Dreenacreenig West and Gortloughra are located within, or partially within, upland habitats (bog/wet grassland). However forestry and open upland habitats are widespread and abundant in the landscape. Extensive areas of suitable habitat will persist after construction. Given that buzzard at the Proposed Wind Farm

site was determined to be a population of Local Importance (Higher Value), this further reduces the likelihood of significant cumulative impacts at the landscape scale.

Information on collision risk at other wind farms was available. The predicted number of collisions per annum were: 0.038 for Curraghglass, 0.12 for Gortloughra and 0.28 for Carrigariark Extension. Combined with the Proposed Project, this is a cumulative 0.51 birds per annum. If 0.51 collisions were to occur per annum, this would increase the annual mortality of the county population by 3.4%. The magnitude of the effect is assessed as low, which corresponds to a Very Low effect significance.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on buzzard are anticipated at the county, national or international scale.

Sparrowhawk

At a national level, the main pressures and threats for sparrowhawk listed in Article 12 reporting are: removal of small landscape features for agricultural land parcel consolidation; conversion from mixed farming and agroforestry systems to specialised; and use of plant protection chemicals in agriculture. The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for sparrowhawk. The threats/pressures relating to agriculture and forestry are ranked as of medium importance.

Snipe is a habitat generalist that may use commercial forestry, agricultural and upland environments. Curraglass, and Shehy More are all located within, or partially within, commercial forestry. Dreenacreenig West and Gortloughra are located within, or partially within, upland habitats (bog/wet grassland). However forestry and open upland habitats are widespread and abundant in the landscape. Extensive areas of suitable habitat will persist after construction. Given that sparrowhawk at the Proposed Wind Farm site was determined to be a population of Local Importance (Higher Value), this further reduces the likelihood of significant cumulative impacts at the landscape scale.

Information on collision risk at other wind farms was available. The predicted number of collisions per annum were: 0.015 for Knocknamourk and 0.004 for Curraghglass. A specific value was not provided for Gortahilly or Gortloughra, but collision risk here was assessed to be negligible for Gortloughra. Combined with the Proposed Project, this is a cumulative 0.024 birds per annum. If 0.024 collisions were to occur per annum, this would increase the annual mortality of the county population by 0.2%. The magnitude of the effect is assessed as negligible.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on sparrowhawk are anticipated at the county, national or international scale.

4.3.2.3.1 Increased Anthropomorphic Activity

The DAU raises concern over disturbance from increased anthropomorphic activity at the Proposed Wind Farm site. Disturbance during the construction phase is assessed in full in Section 7.5.5 of the EIAR and reiterated herein. No significant effects were identified for any KOR.

Management and servicing of the wind farm will not add significantly to the background levels of disturbance currently occurring in the area. The temporary disturbance of birds is possible throughout the Proposed Wind Farm site during the operational phase by maintenance vehicles and personnel visits,

particularly in the vicinity of the proposed turbines, access roads and the onsite V substation. This may result in temporary avoidance by birds, however the volume and frequency of such visits is considered to be very low and is likely to be minor in scale and short in duration when it occurs.

4.3.2.3.2 **Special Protection Areas for Chough**

The DAU expresses concern that breeding chough recorded during field surveys are associated with Special Protection Areas. The Proposed Wind Farm site is outside the chough foraging range of any Special Protection Area. Therefore it is unlikely that foraging birds observed during the breeding season originated from a Special Protection Area. The breeding chough recorded during field surveys were nesting within and in proximity to the Proposed Wind Farm site and foraging close to their nest sites, therefore are not dependent on the Special Protection Areas for breeding. As calculated in the cumulative collision risk assessment above, from the best available data, cumulative collisions would increase the annual mortality of the county population by 1.37%. The magnitude of the effect is assessed as low, which corresponds to a Low effect significance.

4.3.2.3.3 **Impacts on Prey Species**

The DAU raises concern over impacts to species such as meadow pipit, which are a prey resource for raptors such as merlin and hen harrier. Meadow pipit are abundant within the Proposed Wind Farm site and surrounds. As outlined in Section 7.5.2 of the EIAR, meadow pipit were found to be breeding on the Proposed Wind Farm site. However, as per NatureScot guidance, it is generally considered that passerine bird species are not significantly impacted by wind farms due to their ecology. As such, the potential for direct habitat loss, disturbance/displacement and collision risk are limited and there is no evidence to suggest that the development will significantly impact this species.

4.4 **Health Service Executive**

The National Environmental Health Service (NEHS), a section within the Health Service Executive (HSE), made a submission with observations and recommendations in relation to the following:

- Public Consultation,
- Noise and Vibration,
- Shadow Flicker,
- Land, Soils and Geology,
- Hydrology and Hydrogeology,
- Traffic and Access,
- Other - CEMP, Food Safety and Environmental Compliance, Recommendations.

4.4.1 **Public Consultation**

The NEHS note that a Community Liaison Strategy was implemented to facilitate engagement with local residents as part of the Proposed Project, which included door-to-door distribution of information packs to households within approximately 2km of the Proposed Wind Farm site, a project website and dedicated contact channels, direct liaison with residents regarding queries and concerns, and 2 no. public information events in April and November 2025. The NEHS considers it important that regular communication and engagement with the local community be maintained throughout the construction and operational phases of the Proposed Project. The Applicant is committed to continuing this regular communication and engagement with the local community in the event that the Proposed Project is granted planning permission.