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Ballyfeeny Green Energy Limited

Ballyfeeny Green Energy Project

Response to RFI Item 12

June 2026

This report considers the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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Quality Assurance

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The findings outlined within this report and the data we have provided are to our knowledge true and express our bona fide professional opinions. This report has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) good practice guidelines. Where pertinent CIEEM Guidelines used in the preparation of this report include the *Guidelines for Ecological Report Writing* (CIEEM, 2017a), *Guidelines for Preliminary Ecological Appraisals* (CIEEM, 2017b) and *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*, (CIEEM, 2018). CIEEM Guidelines include model formats for Preliminary Ecological Appraisal and Ecological Impact Assessment. Also, where pertinent, evaluations presented herein take cognisance of recommended Guidance from the EPA such as *Guidelines on the information to be contained in Environmental Impact Assessment Reports* (EPA, 2022), and in respect of European sites, *Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC* (European Commission, 2018).

Due cognisance has been given at all times to the provisions of relevant legislation including the following as amended *Wildlife Acts 1976-2024,* the *European Union (Natural Habitats) Regulations*, the *European Communities (Birds and Natural Habitats) Regulations 2011-2021,* EU Regulation on Invasive Alien Species under *EU Regulation 1143/2014*, the *EU Birds Directive 2009/147/EC* and *Habitats Directive 92/43/EEC*.

No method of assessment can completely remove the possibility of obtaining partially imprecise or incomplete information. Any limitation to the methods applied or constraints however are clearly identified within the main body of this document.

Version	Date		Name	Signature
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Project Reference	**2232K**	**Title**	Response to RFI Item 12

Notice

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This report was produced by INIS Environmental Consultants Ltd. (INIS) on behalf of Ballyfeeny Green Energy Limited (hereafter known as the Applicant) to in response to a request for further information regarding in-combination effects for the Ballyfeeny Green Energy Project. The purpose of this report is to address point 12 of the request for further information from the Planning Authority, regarding the biogeographical scale impacts to Natura 2000 sites arising from the Ballyfeeny Green Energy Project and associated pathways, with all reasonable skill, care and due diligence within the terms of the contract with the client, incorporating our terms and conditions and taking account of the resources devoted to it by agreement with the client.

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1. INTRODUCTION

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The following request for further information was made by Roscommon County Council (RCC) regarding the Project:

'Lough Ree SPA is noted to be internationally important for breeding gulls and waders, with a small number of remaining clusters of breeding Curlew nest sites and species rich semi-natural habitats. It is noted that Section 5.8 of the Natura Impact Statement has reported that due to the scale of the project and the extent of likely significant effects to be considered in stage 2, any projects with potential for in-combination effects were screened-in for adverse in-combination effects under the precautionary principle. The projects identified as being screened-in are: Ballyfeeney Rock Quarry, Sliabh Bawn Wind Farm, The Lanesboro to Sliabh Bawn 110kV overhead line upgrade, Derryadd Windfarm, Derane Wind Farm and the N5 Ballaghaderreen to Scramoge Realignment Scheme. A consultation response has been received from the Department of Housing, Local Government and Heritage (DHLGH) which reports, inter alia, that a full assessment of the potential cumulative mortality and displacement ex-situ impacts on the Lough Ree SPA Special Conservation Interest (SCI) species from the proposed development should be fully considered at the biogeographic level and that collectively, both consented and proposed energy developments including solar farm developments should be taken into account beyond those projects identified in the Natura Impact Statement (NIS) and EIAR. Projects referenced by the DHLGH in County Roscommon but which have not been scoped-in in the NIS received include; (a) Seven Hills Wind Farm, Co. Roscommon, a Strategic Infrastructure

Development with risks identified for the Lough Ree SPA, (b) Carrowkeel Wind Farm, Co. Roscommon, at the pre-planning stage, with reported concerns raised by the DHLGH of potential in-combination impacts with similar projects on the ornithological SCIs of Lough Ree SPA, and additional small-scale wind energy developments in County Roscommon including the Roxborough and Kilcash projects. In order that full consideration may be given to the potential for cumulative ornithological impacts on the Lough Ree biogeographic area collectively, taking into consideration an assessment of the proposed development in combination with other renewable energy developments at various stages of the planning process, including those currently at the pre-planning phase, as well as those that have received planning consent, the applicant is required to modify the consideration of in-combination effects in the NIS (including NIS Section 8) and relevant in-combination/cumulative assessments in EIAR to give effect to this requirement. Where the foregoing modifies the overall assessment of likely significant effects, appropriately detailed mitigation measures should be incorporated into the NIS, EIAR and associated documents where appropriate.'

A review of the Department of Housing, Local Government and Heritage (DoHLGH) consultation response has been undertaken as part of preparing the response to this further information request. The DoHLGH have recommended that;

'Roscommon County Council should fully take into consideration the potential for cumulative ornithological impacts on the Lough Ree biogeographic area collectively, taking into consideration an assessment of the proposed Ballyfeeny Wind Farm in-combination with other renewable energy developments at various stages of the planning process, including those currently at the pre-planning phase as well as those that have received planning consent.'

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EIAR, **Chapter 6 Biodiversity**, **Section 6.10** submitted as part of the planning application for the proposed Project, provided a cumulative and in-combination effects assessment and was supported by **EIAR**, **Chapter 16 Cumulative Effects**. The cumulative projects assessed in **Chapter 6 Biodiversity** were those with a likely significant cumulative effect on biodiversity. Scoped-in projects included all wind farms and other relevant projects within 20km of the proposed Project.

The as submitted Appropriate Assessment Screening Report and Natura Impact Statement provided full consideration of all in-combination effects at both stages of the AA process. As outlined in **Section 5.7** of the **Natura Impact Statement (NIS)** any project with potential for in-combination effects were screened-in for adverse in-combination effects under the precautionary principle. Scoped-in projects included all wind farms and other relevant projects within 20km of the proposed Project.

The Appropriate Assessment Screening Report and EIAR, **Chapter 6 - Biodiversity** submitted as part of the planning application for the proposed development, identified whether there were viable Source-Pathways in order to assess the potential for significant effects, as outlined in **Section 3.4** of the **Natura Impact Statement** (NIS) (**Volume 6**) and **Section 6.3.2 EIAR**, **Chapter 6 – Biodiversity**.

Item 12 on the Request for Further Information (RFI) received from Roscommon County Council and the consultation response issued by DoHLGH, has requested that an assessment of the potential in-combination effects in the NIS and in-combination/ cumulative effects (notably mortality and displacement ex-situ impacts) on the Lough Ree SPA Special Conservation Interest (SCI) species from the proposed Project be considered at the **biogeographic level** and that collectively, both consented and proposed energy developments including solar farm developments should be taken into account ***beyond those projects identified in the as submitted Natura Impact Statement (NIS) and EIAR***.

To specifically address Item 12 on the RFI from Roscommon County Council and the DoHLGH submission, the additional projects listed in the RFI and those identified to be within the biogeographic area of Lough Ree SPA are considered for in-combination effects and cumulative effects in the form of displacement and mortality ex-situ impacts on the Lough Ree SPA Special Conservation Interest (SCI) species in **Table 1**.

2. Response to Item 12: Consideration of DoHLGH submission – In-Combination (NIS) /Cumulative effects (EIAR)

The biogeographic area of Lough Ree SPA is undefined in the RFI issued by Roscommon County Council and DoHLGH submission. As such in order to establish an appropriate study area for in-combination and cumulative displacement and mortality effects on the Lough Ree SPA, a worst-case scenario biogeographic area Zone of Influence (ZoI) of 20km from Lough Ree SPA was established. This ZoI is considered appropriate and in accordance with Nature Scot (formerly SNH) *Assessing Connectivity with Special Protection Areas (SPAs)* guidance (SNH, 2016). SNH (2016) provides guidance in relation to the identification of ecological connectivity between proposed development sites and Special Protection Areas. The guidance is also relevant to Ireland for species that are also present in Ireland. The distances for core and maximum dispersal and foraging ranges are drawn from a literature review that examined ranging behaviour across a variety of locations in Britain, Ireland and beyond, not just in Scotland (Pendlebury et al. 2011). The guidance takes into consideration the distances species may

travel beyond the boundary of relevant SPAs and provides information on dispersal and foraging ranges of bird species which are frequently encountered when considering plans and projects. It goes on to state that "i*n most cases the core range should be used when determining whether there is connectivity between the proposal and the qualifying interests*". Where SPAs are at greater distance from the proposed development than the core foraging distances for their listed SCI species, there is no likely ecological connectivity to the development and so the SPAs are outside the likely zone of Impact.

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According to the SNH (2016) guidance, the largest core foraging distances from SPAs is 15-20 km (based on wintering greylag goose and pink-footed goose). This represents the largest foraging range of all the species listed in the SNH (2016) guidance document.

A desk study was undertaken including a review of planning files from Roscommon County Council, Westmeath County Council and Longford County Council in order to list the consented and proposed energy developments including solar farm developments within a 20km distance of Lough Ree SPA.

A total of 10 projects have been included for consideration, including the projects listed by DoHLGH and other renewable energy developments identified through the desk study, within the Lough Ree SPA biogeographic area and are assessed in **Table 1**. These additional projects which are **beyond those projects identified in the NIS and EIAR** as submitted and assessed for the purposes of this response range in distance from 17.9km – 40.6km from the proposed Project.

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Table 1: *Projects identified for in-combination and/or cumulative effects within the Lough Ree SPA biogeographic area*

Project	Planning / Project Ref.	Distance to the proposed Ballyfeeny Wind Farm Site	Distance to Lough Ree SPA	Scoped in / out for in combination and/or cumulative effects
Creevy Solar Farm	PD/17/28 ACP: 248780	17.9km	5.4 km	A review of the planning file for the Creevy Solar farm and information available on the project was undertaken. This solar farm is constructed and has exported its first power to the national grid in April 2026. The project was granted planning permission by An Coimisiún Pleanála (formally An Bord Pleanala), the board's decision to grant permission was generally in accordance with the inspector's recommendations. The planners report concludes that the Creevy Solar Farm, would not be likely to have a significant effect on Lough Ree SPA, and a Stage 2 Appropriate Assessment (NIS) was not required. Based on the findings above, the distance between Creevy Solar Farm and that of the Ballyfeeny Green Energy Project, the findings of no significant residual effects on ornithological receptors associated with the proposed project (EIAR, Chapter 6, Section 6.13), it can be concluded that there is no likely significant in-combination or cumulative effects with regards to displacement and mortality on the SCIs of Lough Ree SPA. It is concluded based on the findings from the Screening Assessment completed for the Creevy Solar Farm and the NIS prepared for the proposed Project, there is no potential for the proposed Ballyfeeny Green Energy Project to contribute to any cumulative adverse effects on the Lough Ree SPA when considered in-combination with the operational Creevy Solar Farm. Scoped out - no further assessment is required.

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Project	Planning / Project Ref.	Distance to the proposed Ballyfeeny Wind Farm Site	Distance to Lough Ree SPA	Scoped in / out for in combination and/or cumulative effects
Skrine Wind Farm	4103	25.4km	7.1 km	Given the separation distance between Skrine Wind Farm and that of Ballyfeeny Green Energy Project, there is no likely significant in-combination or cumulative effects with regards to displacement and mortality on the SCIs of Lough Ree SPA. As outlined in Section 8 and 10 of the NIS for the Ballyfeeny Green Energy Project, there is no potential for cumulative adverse effects on any European Site, individually or in combination with any other development. In consideration of the information available, it can be concluded there is no likely in-combination effects between the proposed Ballyfeeny Green Energy Project and that of the Skrine Wind Turbines (2 No. operational turbines) on the SCIs of the Lough Ree SPA. Scoped out - no further assessment is required.
Foigha Solar Farm	2460325 ACP: 500085	27.8km	1.6km	The Foigha Solar Farm was granted planning permission by the Planning Authority on the 25th of September 2025. The project has subsequently been appealed and is awaiting a decision by An Coimisiún Pleanála. A Natura Impact Statement and Ecological Impact Assessment (EIA) was submitted to the Planning Authority, as part of the development. The NIS concluded that, with the implementation of mitigation measures set out in the NIS, there will be no potential for direct, indirect or cumulative impacts arising from the proposed Foigha Solar Farm either alone or in-combination on Lough Ree SPA. The distance between Foigha Solar Farm and that of the Ballyfeeny Green Energy Project, and the findings of no significant residual effects on ornithological receptors associated with the Ballyfeeny Green Energy Project (EIAR, Chapter 6, Section 6.13), it can be concluded that there is no likely significant in-combination or cumulative effects with regards to displacement and mortality on the SCIs of Lough Ree SPA. It is concluded based on the findings of the AASR and NIS completed for the Foigha Solar Farm and the NIS prepared for the Ballyfeeny Green Energy Project, there is no potential for the proposed Ballyfeeny Green Energy Project to contribute to any cumulative

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Project	Planning / Project Ref.	Distance to the proposed Ballyfeeny Wind Farm Site	Distance to Lough Ree SPA	Scoped in / out for in combination and/or cumulative effects
				adverse effects on the Lough Ree SPA when considered in-combination with the Foigha Solar Farm. Scoped out - no further assessment is required.
Kilcash Wind Turbine	2360142 ACP: 319800	24.3km	4.7km	The Kilcash project, was one of five projects identified by the DoHLGH, in their submission to the Planning Authority. The Kilcash wind turbine was granted planning permission by An Coimisiún Pleanála in February 2025. An NIS was submitted as part of the planning application for the proposed development. A review of the NIS and Inspectors Report has been carried out. It was considered that the wind turbine would give rise to localised displacement of foraging by Golden Plover and Lapwing (both SCIs of Lough Ree SPA). It was, however, concluded that the single turbine was unlikely to lead to total displacement from the site of either species, and was considered to be a minor adverse effect. Similarly, potential collision risk to Golden Plover and Lapwing was identified. The collision risk was considered to be minor in scale and would not constitute a significant effect on any European Site. It is also noted that a single observation of four Whooper Swans flying over the site occurred. The risk of collision or displacement effects on Whooper Swan was considered negligible. The NIS concluded that there would be no adverse effects on the integrity of any European Site as a result of the proposed Kilcash Wind Turbine. Given the separation distance between Kilcash Wind Turbine and that of the Ballyfeeny Green Energy Project and the scale of the Kilcash Wind Turbine (1 No. turbine), there is no likely significant in-combination or cumulative effects with regards to displacement and mortality on the SCIs of Lough Ree SPA. As outlined in Section 8 and 10 of the NIS for the Ballyfeeny Green Energy Project, there is no potential for cumulative adverse effects on any European Site, individually or in combination with any other development.

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Project	Planning / Project Ref.	Distance to the proposed Ballyfeeny Wind Farm Site	Distance to Lough Ree SPA	Scoped in / out for in combination and/or cumulative effects
				In consideration of the information available, it can be concluded there is no likely in-combination effects between the proposed Ballyfeeny Green Energy Project and that of the Kilcash Wind Turbine on the SCIs of the Lough Ree SPA. Scoped out - no further assessment is required.
Ballymahon Solar Farm	2560265	24.7km	5.1 km	Planning permission for the proposed Ballymahon Solar Farm was granted by the Planning Authority in May 2026. An EIAR, AA and NIS has been submitted as part of the Planning Application and has been reviewed as part of this response. Direct Mortality during construction was screened out for further assessment for Lough Ree SPA. Disturbance during construction was screened in for further assessment for Lough Ree SPA, including for the SCIs Whooper Swan, Lapwing and Golden Plover. Where the potential for adverse effects have been identified, mitigation measures have been proposed. The NIS concluded that the proposed development individually or in-combination with other plans and projects will not adversely affect the integrity of any Natura 2000 site. The assessment of effects on Golden Plover, Lapwing, and Whooper Swan have been considered as part of the proposed Ballyfeeny Green Energy Project. Disturbance and mortality effects both individually and in-combination were considered to be unlikely. Based on the findings and given the separation distance between the Ballymahon Solar Farm and that of the Ballyfeeny Green Energy project, there is no likely significant in-combination or cumulative effects with regards to displacement and mortality on the SCIs of Lough Ree SPA. Based on the findings of the NIS prepared for the proposed Ballyfeeny Green Energy Project and the NIS for the proposed Ballymahon Solar Farm no significant displacement or mortality in-combination effects are considered likely.

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Project	Planning / Project Ref.	Distance to the proposed Ballyfeeny Wind Farm Site	Distance to Lough Ree SPA	Scoped in / out for in combination and/or cumulative effects
				It is concluded given the distance between both projects and based on the findings outlined, there is no potential for the proposed Ballyfeeny Green Energy Project to contribute to any cumulative adverse effects on the Lough Ree SPA when considered in-combination with the consented Ballymahon Solar Farm project. Scoped out - no further assessment is required.
Carrowkeel Wind Farm	2660172	24.9km	8.5km	Carrowkeel Wind Farm was identified in the DoHLGH submissions made to the Planning Authority with respect to the proposed Project. The Carrowkeel Wind Farm project was submitted to Roscommon County Council in April 2026. An EIAR, AASR and NIS was submitted as part of the planning application, for the proposed Carrowkeel project, and have been considered as part of this response. The residual effects assessment for the proposed Carrowkeel project concludes that the proposed project, either individually or cumulatively with other projects, will not result in significant effects on any of the identified key ornithology receptors (EIAR, Chapter 6, Section 6.14 of the proposed Carrowkeel Wind Farm project). Based on the findings and given the separation distance between the Carrowkeel Wind Farm and that of the Ballyfeeny Green Energy Project, there is no likely significant in-combination or cumulative effects with regards to displacement and mortality on the SCIs of Lough Ree SPA. In the submitted NIS for the proposed Carrowkeel project one SCI species (Golden Plover) of Lough Ree SPA was carried forward to the Stage 2 AA. Following the implementation of mitigation measures it was determined that no significant residual effects on the Lough Ree SPA SCI species Golden Plover, either individually or in combination with other plans or projects, are likely to occur. Based on the findings of the NIS prepared for the proposed Ballyfeeny Green Energy Project and the NIS for the proposed Carrowkeel Wind Farm project no significant displacement or mortality in-combination effects are considered likely.

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Project	Planning / Project Ref.	Distance to the proposed Ballyfeeny Wind Farm Site	Distance to Lough Ree SPA	Scoped in / out for in combination and/or cumulative effects
				It is concluded given the distance between both projects and based on the findings outlined, there is no potential for the proposed Ballyfeeny Green Energy Project to contribute to any cumulative adverse effects on the Lough Ree SPA when considered in-combination with the proposed Carrowkeel Wind Farm project. Scoped out - no further assessment is required.
Seven Hills Wind Farm	PA20.313750/ VA20.321238	34.5km	1.8 km	Seven Hills Wind Farm was identified in the DoHLGH submission made to the Planning Authority with respect to the proposed Project. The wind farm was granted planning permission by An Bord Pleanála in November 2023. ABP (now ACP) decision was generally in accordance with the inspector's report. An EIAR and NIS was submitted as part of the planning application and has been reviewed as part of this response. Potential effects considered in relation to Lough Ree SPA include general disturbance to SCI species during construction and mortality related to collision with operational turbines. All SCI species related to Lough Ree SPA were screened in for further assessment in a Stage 2 Appropriate Assessment. It was concluded that the Seven Hills Wind Farm individually or in-combination with any other plans or projects would not adversely effect the integrity of Lough Ree SPA, subject to the implementation of mitigation measures set out. Based on the findings and given the significant separation distance between the Seven Hills Wind Farm and that of the Ballyfeeny Green Energy project, there is no likely significant in-combination or cumulative effects with regards to displacement and mortality on the SCIs of Lough Ree SPA. Based on the findings of the NIS prepared for the proposed Ballyfeeny Green Energy Project and the NIS for the consented Seven Hills Wind Farm no significant displacement or mortality in-combination effects are considered likely. It is concluded given the distance between both projects and based on the findings outlined, there is no potential for the proposed Ballyfeeny Green Energy Project to

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Project	Planning / Project Ref.	Distance to the proposed Ballyfeeny Wind Farm Site	Distance to Lough Ree SPA	Scoped in / out for in combination and/or cumulative effects
				contribute to any cumulative adverse effects on the Lough Ree SPA when considered in-combination with the consented Seven Hills Wind Farm. Scoped out - no further assessment is required.
Umma More Limited	ACP: 321595 ACP: 316051	37.9km	10km	The Umma More wind farm project was refused planning permission by An Bord Pleanála in February 2024. The Board's decision has subsequently been quashed by order of the High Court. The case has been reactivated by ACP following the High Court order and is currently pending a decision. An EIAR, AA Screening Report and Natura Impact Statement accompanied the planning application for the Umma More project and has been reviewed as part of this response. The proposed Umma More wind farm site was considered to be located outside the potential foraging range of SCI Species associated with the Lough Ree SPA. Disturbance and mortality effects both individually and in-combination were screened out in the Appropriate Assessment Screening Report and not considered further in the NIS. Based on the information available with regard to the proposed Umma More wind farm and the significant distance between the Umma More wind farm and that of the proposed Ballyfeeny Green Energy Project, there is no likely significant in-combination or cumulative effects with regards to displacement and mortality on the SCIs of Lough Ree SPA. Based on the findings of the NIS prepared for the proposed Ballyfeeny Green Energy Project and the AASR for the proposed Umma More wind farm no significant displacement or mortality in-combination effects are considered. There is therefore no potential for the proposed Ballyfeeny Green Energy Project to contribute to any cumulative adverse effects on the Lough Ree SPA when considered in-combination with the proposed Umma More Wind Farm.

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Project	Planning / Project Ref.	Distance to the proposed Ballyfeeny Wind Farm Site	Distance to Lough Ree SPA	Scoped in / out for in combination and/or cumulative effects
				Scoped out - no further assessment is required.
TDC Community Solar Park/Taduff Solar Park and Battery Energy Storage Facility	2036 21350 23197	40.6km	5.2 km	A number of planning permissions in relation to the consented TDC Community Solar Park have been considered as part of this response. From a review of the project website construction is expected to begin in Spring 2028. The planning files for each application have been reviewed including the Ecological Impact Assessment, the Appropriate Assessment Screening Report and Natura Impact Statements. Potential disturbance effects were considered on the SCI species of Lough Ree SPA during the construction phase of the Taduff Solar Park. The Inspector's and Planner's reports have concluded that with the implementation of mitigation as set out for in the EcIA, AASR and NIS, the TDC Community Solar Park will not adversely affect the integrity of any European Sites (including Lough Ree SPA). Based on the findings and given the separation distance between the TDC Community Solar Project and that of the Ballyfeeny Green Energy Project, there is no likely significant in-combination or cumulative effects with regards to displacement and mortality on the SCIs of Lough Ree SPA. Based on the findings of the NIS prepared for the proposed Ballyfeeny Green Energy Project and the NIS for the proposed TDC Community Solar Project no significant displacement or mortality in-combination effects are considered likely. Scoped out - no further assessment is required.
Moate Solar Farm	2260041 ACP: 318352	40.1km	14.6 km	The proposed Moate Solar Farm was granted permission by An Coimisiún Pleanála in November 2024, the board's decision to grant permission was generally in accordance with the inspector's recommendation. A review of the planning files has been completed including the Ecological Appraisal, Appropriate Assessment and Natura Impact Statement submitted with the planning application.

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Project	Planning / Project Ref.	Distance to the proposed Ballyfeeny Wind Farm Site	Distance to Lough Ree SPA	Scoped in / out for in combination and/or cumulative effects
				Ornithological connectivity with the Lough Ree SPA is assessed in Moate Solar Farm Ecological Appraisal. It was considered that the solar farm, in the absence of mitigation, is unlikely to cause significant adverse effects for the qualifying bird species of the Lough Ree SPA. The Ecological Appraisal determined no likely significant cumulative effects upon any nearby environmental designated sites. Displacement effects on the SCI species associated with Lough Ree SPA were considered for likely significant effects. The NIS concludes with design measures, mitigation and best practice construction methods, the proposed Moate Solar Farm will not have a significant effect on any European Site (including Lough Ree SPA). Based on the findings and given the significant separation distance between the Moate Solar Farm and that of the Ballyfeeny Green Energy Project, there is no likely significant in-combination or cumulative effects with regards to displacement and mortality on the SCIs of Lough Ree SPA. Based on the findings of the NIS prepared for the proposed Ballyfeeny Green Energy Project and the NIS for the consented Moate Solar Farm no significant displacement or mortality in-combination effects are considered likely. It is concluded given the distance between both projects and based on the findings outlined, there is no potential for the proposed Ballyfeeny Green Energy Project to contribute to any cumulative adverse effects on the Lough Ree SPA when considered in-combination with the consented Moate Solar Farm project. Scoped out - no further assessment is required.

3. CONCLUSIONS

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Following the consideration of the renewable energy projects listed in **Table 1**, within the Lough Ree SPA biogeographic ZoI, cumulative displacement and mortality effects are considered to be unlikely and in combination impacts which would affect the integrity of the Lough Ree SPA will not occur.

As stated in the **EIAR**, **Chapter 6 Biodiversity,** Section 6.10 Cumulative Effects Assessment scoped-in projects included all wind farms and other relevant developments within 20km of the proposed Ballyfeeny Green Energy Project. **Section 8** of the Ballyfeeny Green Energy Project NIS considered all projects within a 20km ZoI that had potential to have in-combination effects on the Lough Ree SPA when considered in-combination with the proposed Ballyfeeny Green Energy Project. This ZoI of 20km is considered appropriate and in accordance with Nature Scot (formerly SNH) *Assessing Connectivity with Special Protection Areas (SPAs)* guidance (SNH, 2016).

From the overview presented in Table 1 for this response to RFI Item 12, it is considered that the conclusion in the EIAR that "t*here will be no significant adverse effect on the conservation objectives for Golden Plover, or any other SCIs for statutory Sites during the operation phase*" and the conclusion in the NIS that "*no adverse effect would likely results from in-combination interactions….no additional mitigation measures are required to prevent or avoid an adverse effect*" still stands further to the assessment provided.

It is therefore considered that all projects with any likely potential to result in cumulative significant effects or in combination adverse impacts on the integrity of the Lough Ree SPA were appropriately considered in the submitted EIAR and NIS for the proposed Ballyfeeny Green Energy Project and that the assessments are in accordance with all best practice guidance (including OPR, 2021a; OPR, 2021b) and relevant legislation. As such, no modification of the NIS or EIAR submitted as part of the planning application for the proposed Ballyfeeny Green Energy Project, is considered appropriate or necessary.

3.1. AA Screening Conclusion

Following the review of the methodology and assessment for the screening for Appropriate Assessment undertaken, the Statement provided in the submitted AA screening remains unchanged:

"*On the basis of objective scientific information and in completion of the report to inform Screening for AA in respect of the proposed wind farm Project at Ballyfeeny, and surrounding townlands, Co. Roscommon, it is the considered opinion of Inis Environmental Consultants Ltd. that in the absence of mitigation, likely significant effects on the receptors identified in Table 12 on the following European sites (Lough Ree SAC, Lough Ree SPA & Ballykenny-Fisherstown Bog SPA) cannot be ruled out during the construction, operation and decommissioning phases of the proposed Project. As a result it is respectfully submitted that the competent authority carry out an Appropriate Assessment (AA) in respect to the proposed Project. To assist with the AA, relevant Qis/SCIs, either individually or in-combination with other projects and plans and are further assessed for possible adverse effects within* ***the Stage 2 NIS***. *See Table 12 for a summary of the screening results.*"

3.2. NIS Conclusion

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In addition, following this review of additional projects and the possibility of in-combination effects, the Statement provided in the submitted NIS also remains unchanged:

*"Cumulative and In-combination effects are presented and considered in detail in **Section 8** of this NIS. Provided adherence to the overarching policies and objectives of the plans and programmes and best practice and mitigation measures are implemented for individual projects, there is no potential for the mentioned plans and projects to have a cumulative impact to features of biodiversity interest, in combination with the Project. All Projects considered in the Zone of Influence of the Project are subject to the statutory planning process and where required are accompanied by the requisite planning and environmental assessment documentation, including Appropriate Assessment, Ecological Impact Assessment and Environmental Impact Assessment reporting. To that end, other projects, programmes and plans within the project zone of influence have been developed under the consideration of potential impacts and effects to their receiving and surrounding environment and are tasked with avoiding and minimising such impacts, through the Appropriate Assessment and Environmental Impact Assessment processes.*

*It is determined that, following the implementation of mitigation measures for the protection of designated QIs and SCIs, as outlined in **Section 8**, on the basis of best scientific evidence and in the absence of any reasonable scientific doubt, that the Project, individually or in combination with any other development, **will not adversely effect** the integrity of any European Site."*

3.3. Chapter 6 of EIAR Conclusion

As with the AA/NIS, the conclusion of the biodiversity chapter of the EIAR also remains unchanged. No projects stated in the DoHLGH or within the wider biogeographical area of Lough Ree SPA require amendments to the EIA assessment for cumulative or in-combination effects. As such, following this consideration of the indicated projects, the submitted conclusion for the EIAR remains unchanged.

"*This chapter has assessed the potential effects on biodiversity during the construction, operation and decommissioning phases of the proposed Project. **Table 6-27** displays the impact assessment for all phases of the Project and confirms the residual effects following the application of mitigation measures. The assessment has identified that the proposed Project exhibits low risk to Biodiversity and that there will be No Significant effects on Biodiversity because of the proposed Project. Due to the prevention and mitigation measures to be taken, it is not likely that there will be significant effects on biodiversity and the environment.*"

RECEIVED: 05/06/2026

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