

## Ecology – Primary Report

<b>PLANNING REFERENCE NUMBER</b>	25/6398
<b>APPLICATION RECEIVED</b>	06-Nov-2025
<b>APPLICANT</b>	Wingleaf Limited
<b>APPLICATION TYPE</b>	Permission
<b>DESCRIPTION</b>	<p>Permission for a period of 10 years for development of this site. The proposed development will consist of the provision of the following: I. 3 no. wind turbines with an overall turbine tip height of 156.5 metres; a rotor blade diameter of 133 metres; and hub height of 90 metres, and associated foundations, hard-standing and assembly areas; II. Continued use of the existing onsite 38kV substation and associated 38kV underground cabling (built under Cork County Council Ref. No. 00/6590 / An Coimisiún Pleanála Ref. No. 04.127297); III. A meteorological mast with a height of 30 metres above ground and associated foundation and hard-standing area; IV. All associated underground electrical and communications cabling connecting the wind turbines and meteorological mast to the existing onsite 38kV substation; V. A temporary construction compound (including 2 no. site offices and staff facilities (with a combined floor area of 60 sq.m); VI. A borrow pit; VII. Peat and spoil management; VIII. Upgrade of existing site tracks / roads and provision of new site access roads, junctions and hardstand areas; IX. Temporary improvements and modifications to the existing site access junction off the R584 to facilitate delivery of turbine components; X. Upgrade of an existing access track off the R584, including temporary improvements and modifications to facilitate a turbine component turning area; XI. Tree Felling and Vegetation Removal; XII. Biodiversity Enhancement measures (Kerry Slug habitat enhancement, peatland habitat</p>

enhancement, and riparian planting of native broadleaf trees); XIII. Site Drainage; XIV. Operational stage site signage; and XV. All associated site development works, ancillary works and apparatus. A 35-year operational life from the date of the full commissioning of the wind turbines and subsequent decommissioning of the development is being sought. An Environmental Impact Assessment Report (EIAR) and Naura Impact Statement (NIS) have been prepared in respect of the proposed development and accompany this planning application.

Cead a iarraidh ar feadh tréimhse 10 mbliana, chun an suíomh seo a fhorbairt sna bailte fearainn Doirín Dún Aodha, An Currach Glas, An Cheapach Bhuí Bheag, agus An Inse Mhór, Co. Chorcaí. Cuimseofar na nithe seo leanas san bhForbairt Bearthaithe; I. 3 thuirbín gaoithe le huasairde barr tuirbín de 156.5 méadar; trastomhas lann rótair de 133 méadar; agus airde moil de 90 méadar, agus na boinn, na limistéir chrua-sheasta agus na limistéir tionóil ghaolmhara; II. Úsáid leanúnach an fhostáisiúin 38kV atá ar an Suíomh cheana féin agus an cháblaíocht faoi thalamh 38kV gaolmhar (tógtha faoi Uimhir Thagartha Chomhairle Contae Chorcaí 00/6590 / Uimhir Thagartha an Choimisiúin Phleanála 04.127297); III. Crann meitéareolaíochta atá 30 méadar ar airde os cionn na talún agus an bunús agus an limistéar cruu-sheasta gaolmhar; IV. An cháblaíocht leictreach agus cumarsáide faoi thalamh gaolmhar go léir a nascann na tuirbíní gaoithe agus an crann meitéareolaíochta leis an bhfostáisiún 38kV atá ann cheana féin ar an Suíomh; V. Compún tógála sealadach (lena n-áirítear 2 oifig suímh agus áiseanna foirne, (le hachar urláir comhcheangailte de 60

	<p>méadar cearnach); VI. Sloc iasachta; VII. Bainistiú móna agus cartadh; VIII. Uasghrádú ar rianta/bóithre suímh atá ann cheana féin, agus soláthar bóithre rochtana suímh nua, acomhail agus limistéir chrua-sheasta; IX. Feabhsuithe agus modhnuithe sealadacha ar an acomhal rochtana suímh atá ann cheana féin amach ón R584 chun seachadadh ualaí neamhghnácha a éascú; X. Uashghrádú ar an mbóthar rochtana atá ann cheana féin amach ón R584, lena n-áirítear feabhsuithe agus modhnuithe chun limistéar casadh comhpháirteanna tuirbíní a éascú; XI. Leagan Crann agus Baint Fásra; XII Bearta Feabhsúcháin Bithéagsúlachta (feabhsú gnáthóige drúchtín ballach, feabhsú gnáthóige portaigh, agus plandáil crainn dhúchasacha leathanduilleacha bruachánach); XIII. Draenáil Suímh; XIV. Comharthaíocht ar shulomh na céime oibríochta; agus XV. Gach obair fhorbartha suímh ghaolmhar, oibreacha coimhdeacha agus fearas. Saolré oibríochta 35 bliain ó dháta choimisiúnaithe iomlán na dtuirbíní gaoithe agus díchoimisiúnaithe na forbartha ina dhiaidh sin atá á lorg. Tá Tuarascáil ar Mheasúnú Tionchair Timpeallachta (EIAR) agus Ráiteas Tionchair Natura (NIS) ullmhaithe I ndáil leis an bhforbairt bheartaithe agus gabhann siad an iarratas pleanála seo.</p>
<b>LOCATION</b>	Wingleaf Limited, Derreendonee, Curraglass,, Cappaboy Beg and Inchi More, Co. Cork
<b>DECISION DUE DATE</b>	09-Jan-2026

## 1 Site Location

The Proposed Development is located within a rural, agricultural setting in southwest Cork, approximately 6.8km northeast of Kealkill Village and 3.8km southwest of the village of Ballingearry (Figure 1). The Site historically hosted an operational windfarm that had its turbines removed, with existing wind farm infrastructure, such as the existing windfarm roads, the onsite 38kV substation and existing 38kV overhead line.

The Site covers an area of approximately 270 hectares in total, the majority of which is planted with mixed forestry and existing wind farm infrastructure. The Site ranges in elevation from 111 metres above ordnance datum (OD), in the northeast the Site, to 347m OD in the east of the Site. Current land-use on the Site comprises of commercial, agricultural land and unutilised existing wind farm infrastructure. Wind energy is also a significant land use within the surrounding area and includes the operating Shehy More, Grousemount and Cleanrath wind farms. In addition to forestry and wind energy, other land-uses in the surrounding area include agriculture, and residential / commercial activities. Three no. turbines are planned for the site as well as a meteorological mast (See Figure 2)

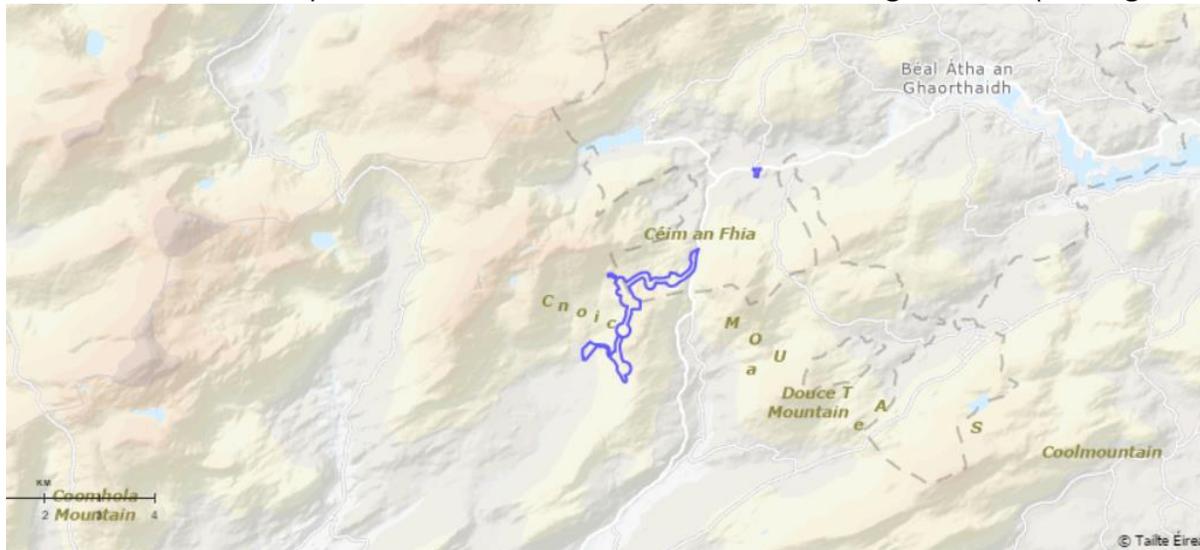


Figure 1 Site Location

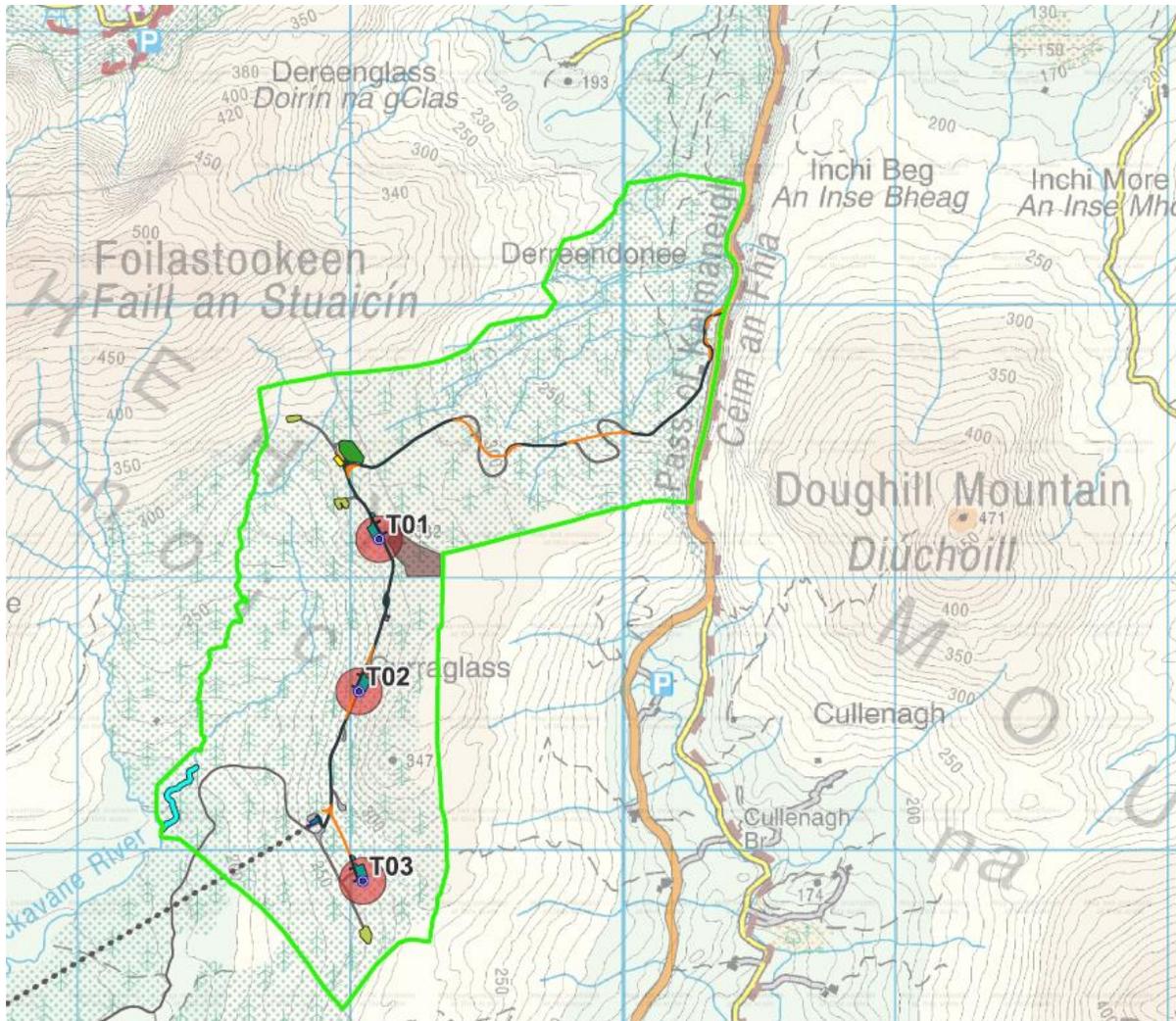


Figure 2 Turbine Layout (T01, T02, T03)

## 2 Hydrology

The southern section of the Site (including all proposed infrastructure apart from the Site entrance road and proposed turbine compound turning area) is located in the Owvane River surface water catchment within the Coomhola\_SC\_010 sub-catchment.

The northern section of the Site (limited to the Site entrance road and proposed turbine turning area) is located in the River Lee surface water catchment (Lee(Cork)\_SC\_010). All sub-catchments are located within Hydrometric Area 21 of the South Western River Basin District.

The Owvane River flows to the south and south west of the Site and discharges into Bantry Bay, approximately 11km to the southwest. The River Lee flows north-easterly towards Lough Allua approximately 8km to the northwest of the Site and then on towards Cork Harbour.

The eastern half of the Site is within the Owvane River surface water catchment, which drains directly into the Owvane River and the western part of the site drains to the Ownbeg River also known as the Lacakavane River (see Figure 3 Regional Hydrology).

Surface water quality is described as ranging from good to high.

Groundwater WFD Status is described as Not At Risk.

Groundwater Body Status is described as:

“The Beara Sneem ground water body (GWB) (IE\_SW\_G\_019) underlies most of the Site.

This GWB is assigned ‘Good Status’.

The Ballinhassig\_2 GWB (IE\_SW\_G\_005) underlies the far west of the Site and is also assigned ‘Good Status’.

Surface water Status for the two rivers at the site is High, but is Good further downstream, away from the site.

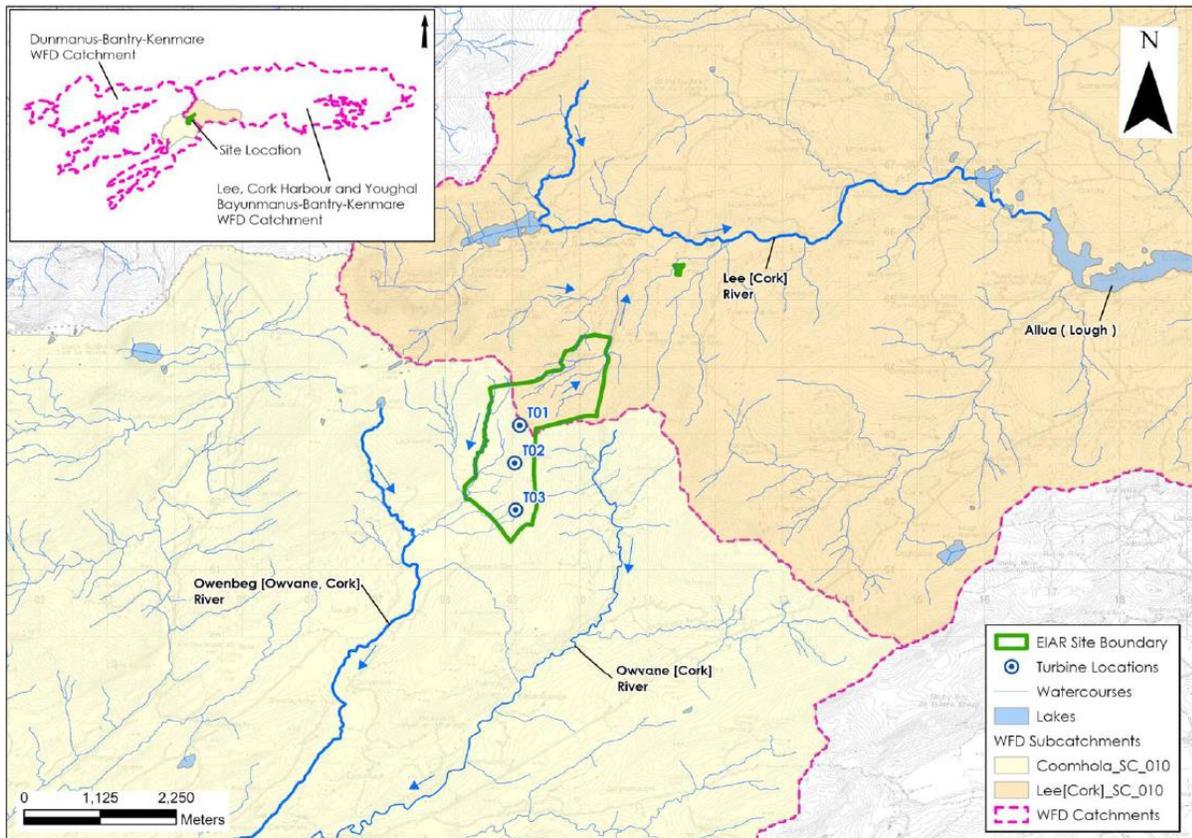


Figure 3 Regional Hydrology

### 3 NATURA Sites

Derryclogher (Knockboy) Bog SAC is 5.5km west of the site.

There is no hydrological connection from the site to the SAC.

The Gearagh SAC and SPA is 23km north west of the site.

There is a hydrological connection from the site to the SAC and SPA.

Glanlough Woods SAC (002315)

Distance: 9.6 km

Hydrological connectivity: No hydrological connectivity

Kilgarvan Ice House SAC (000364)

Distance: 11.6 km

Hydrological connectivity: No hydrological connectivity

Given the lack of connectivity to the other Natura sites, they are screened out and only The Gearagh SAC and SPA are considered further in this report (see Figure 4).

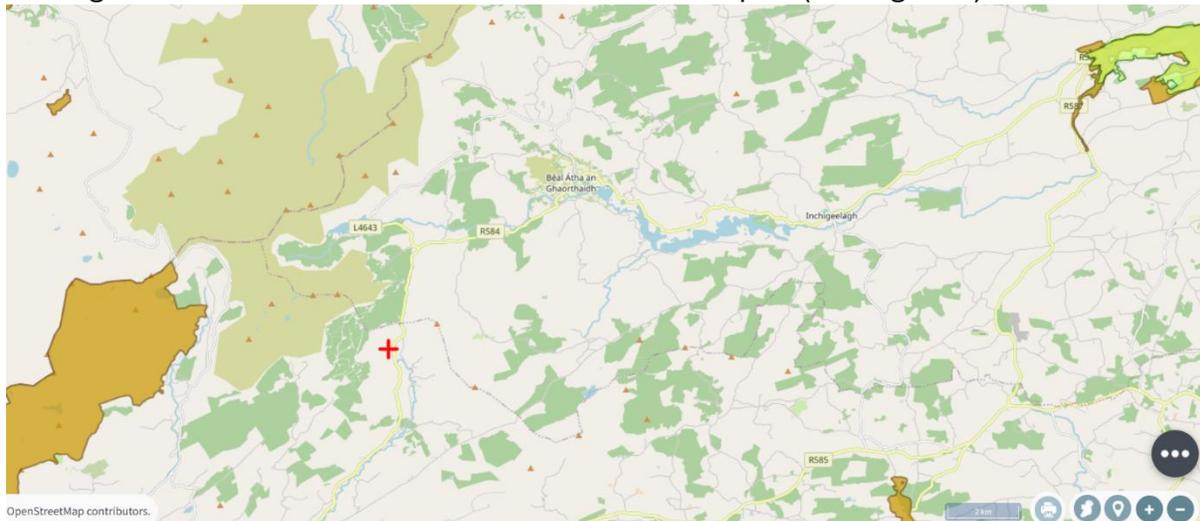


Figure 4 Site location, (red cross), Derryclogher (Knockboy) Bog SAC (brown - west), The Gearagh SAC/SPA (green & brown – north east)

## 4 Reports Submitted

### Natura Impact Statement and AA Screening – summary

The NIS was produced by MKO planning and Environmental Consultants.

Characteristics of the receiving environment are described as follows:

### Hydrology

The southern section of the Site (including all proposed infrastructure apart from the Site entrance road and proposed turbine component turning area) is located in the Owvane River surface water catchment within the Coomhola\_SC\_010 sub-catchment.

The northern section of the Site (limited to the Site entrance road and proposed turbine turning area) is located in the River Lee surface water catchment (Lee(Cork)\_SC\_010). All sub-catchments are located within Hydrometric Area 21 of the Southwestern River Basin District.

The Owvane River flows to the southeast of the Site and discharges into Bantry Bay, approximately 11km to the southwest. The River Lee flows towards Lough Allua to the north of the Site and then on towards Cork Harbour.

The eastern half of the Site is within the Owvane River surface water catchment drains directly into the Owvane River and the western part of the site drains to the Ownbeg River also known as the Lacakavane River.

Surface water quality is described as ranging from good to high.

Groundwater vulnerability is described as extreme.

Groundwater Body Status is described as:

“The Beara Sneem GWB (IE\_SW\_G\_019) underlies most of the Site. This GWB is assigned ‘Good Status’, which is defined based on the quantitative status and chemical status of the GWB.

The Ballinhassig\_2 GWB (IE\_SW\_G\_005) underlies the far west of the Site and is also assigned ‘Good Status’.

Surface Water Status for the two rivers at the site is described as High, but is Good further downstream, away from the site.

Habitats and Flora within the Site are described as:

Habitat Name	Fossitt Code
Conifer Plantation & Recently Felled Woodland	WD4/WS5
Spoil and Bare Ground	ED2
Recolonising Bare Ground	ED3
Buildings and Artificial Surfaces	BL3
Wet Heath/Upland Blanket Bog/ Montane Heath/ Exposed Siliceous Rocks	HH3/ PB2/HH4/ER1
Wet Grassland	GS4
Scrub	WS1
Dense Bracken	HD1
Oak-birch-holly Woodland	WN1
Mixed Broadleaved Woodland	WD1
Eroding/Upland Rivers	FW1
Drainage Ditches	FW4

Habitat Name - Fossitt Code (Habitat, Code)

- Conifer Plantation & Recently Felled Woodland WD4/WS5
- Spoil and Bare Ground ED2
- Recolonising Bare Ground ED3
- Buildings and Artificial Surfaces BL3
- Wet Heath/Upland Blanket Bog/ Montane Heath/ Exposed Siliceous Rocks HH3/ PB2/HH4/ER1
- Wet Grassland GS4
- Scrub WS1
- Dense Bracken HD1

- Oak-birch-holly Woodland WN1
- Mixed Broadleaved Woodland WD1
- Eroding/Upland Rivers FW1
- Drainage Ditches FW4

The Site largely comprises forestry that is being actively used for commercial purposes, presenting a mosaic of standing, recently felled, and recolonising forestry areas. It is described as species poor.

It is stated “Of the Proposed Development footprint, small sections of Turbine 1, 2 and 3 hardstands, sections of new access road, upgrades to existing road, small sections of the temporary construction compound and the borrow pit will be located within sections of mature conifer plantation habitat type, as well as the proposed biodiversity enhancement areas”.

It is noted that “The Proposed Development has been designed to utilise this habitat where possible, to reduce loss of higher value habitats within the Site. Components of the Proposed Development which are located within this habitat type include the existing roads for upgrade, temporary construction compound, sections of Turbine 1, 2 and 3 hardstands, and proposed peat and spoil management areas”.

Peatland is the dominant habitat type in the wider project area. This peatland habitat comprises a mosaic of Wet Heath (HH3), Upland Blanket Bog (PB2), and Montane Heath (HH4). Intermittent patches of Exposed Siliceous Rock (ER1) were also recorded in association with this mosaic.

It is stated that “Given the high biodiversity value of these mosaic habitats, and the absence of significant pressures such as forestry and drainage, they are likely to conform to the following Annex I habitats of the EU Habitats Directive:

Alpine and Subalpine heath [4060]

Wet heath [4010]

Dry heath [4030]

Blanket bogs [7130]”.

Wet grassland was recorded throughout areas of recently felled woodland, forming a mosaic with degraded heath habitats and gorse scrub

A linear band of Oak-Birch-Holly Woodland (WN1) is located along the northeastern boundary of the Site between the existing local road and conifer plantation – a portion of this habitat will be removed to provide for access to the site.

#### Turbine Access and Turning Circles

A dedicated turbine component turning area is proposed to the northeast of the Site, approximately 2.2km from the Site entrance and along the R584, to allow turbine delivery vehicles to access the Site. Construction of this turning area will require removal of Dry Meadows and grassy verges (GS2). This track is delineated by a gorse (*Ulex europaeus*), willow (*Salix* sp.), and hawthorn (*Crataegus monogyna*) hedgerows and scrub.

### Invasive Species

It is noted that no other Third or First schedule species were identified during the surveys undertaken.

### Aquatic Habitats

It is noted that the potential aquatic habitats for fisheries were noted as low to moderate and "No rare or protected macro-invertebrate species (according to national red lists) were recorded in the biological water quality samples. No rare or protected macrophytes/aquatic bryophytes were recorded at any of the aquatic survey locations".

### Otters

No signs of otter in the form of prints, spraints, holts or couches were recorded at any of the watercourses surveyed over the course of the study period.

### Identification of the European Sites within the Likely Zone of Influence

The following is noted regarding European Sites within the ZOI of the proposed development:

Derryclogher (Knockboy) Bog SAC (001873)

Distance: 3.8 km

Hydrological connectivity: No hydrological connectivity

Glanlough Woods SAC (002315)

Distance: 9.6 km

Hydrological connectivity: No hydrological connectivity

Kilgarvan Ice House SAC (000364)

Distance: 11.6 km

Hydrological connectivity: No hydrological connectivity

The Gearagh SAC (000108)

Distance: 17.9 km

Hydrological Distance: 27.3 km

The potential for indirect effects was also considered. There is hydrological connectivity between the Site and this SAC via several Order 1 and Order 2 streams in the north-eastern portion of the Site. These flow into the River Lee [EPA Code: 19L03] which subsequently discharges into this SAC approximately 27.3 km downstream.

The Gearagh SPA (004109)

Distance: 18.6 km Hydrological

Distance: 29.6 km

There is hydrological connectivity between the Site and this SPA, which is approx. 29.6 km downstream, via several Order 1 and Order 2 streams within the northeastern portion of the Site. These flow into the River Lee [EPA Code: 19L03] which subsequently discharges into this SPA approximately 29.6 km downstream.

### Identification of relevant Qualifying Features - The Gearagh SAC (000108)

It is stated that “There is a potential pathway for likely significant indirect effects on the aquatic qualifying interest (QI) habitats and aquatic QI species of this SAC via the deterioration of water quality and habitat degradation arising from run-off or percolation of pollutants to surface and/or ground water during the construction and operational phases of the Proposed Development”.

### Potential Impacts on QIs are stated as:

[3260] Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche- Batrachion vegetation

[3270] Rivers with muddy banks with Chenopodium rubri p.p. and Bidention p.p. vegetation

### Potential impact via sediment run off

[1355] Otter (*Lutra lutra*) – potential impact via decrease in water quality.

### Assessment of Qualifying features potentially affected for the Gearagh SPA.

It is stated that the following qualifying species could potentially be impacted by the development:

Mallard, Teal, Wigeon, Coot and Wetlands and Water Birds– potential impact via decrease in water quality.

### The following impact avoidance measures will be applied:

“Sensitive hydrological features have and will be avoided where possible, by application of suitable buffer zones (i.e. 50m to main watercourses, and 10m to main drains). All of the key Proposed Development areas are located significantly away from the delineated 50m watercourse buffer zones with the exception of the upgrading of two existing watercourse crossings, upgrades to existing site access tracks, and proposed riparian planting. Hard standing areas have been designed to the minimum size necessary to accommodate the turbine model that is selected”.

### Clear Felling of Coniferous Plantation

Proposed Mitigation Measures are outlined as follows:

“All felling operations will conform to current best practice Forest Service regulations, policies and strategic guidance documents as well as Coillte and DAFM guidance documents, including the specific guidelines listed below, to ensure that felling, planting and other forestry operations result in minimal potential negative effects to the receiving environment”.

### Mitigation measures which will reduce the risk of entrainment of suspended solids and nutrient release in surface watercourses comprise best practice methods as follows:

- Use suitable machinery to minimize soil disturbance during felling
- Manual tree cutting within 50m buffer; machinery only for extraction
- Maintain roads and culverts; no vehicle tracking through watercourses

- Block ditches and install temporary silt traps to prevent runoff
- Design drains to reduce flow speed and erosion, using rock armour if needed
- Install and maintain sediment traps; dispose of sediment properly
- Use extra sediment controls in erosion-prone or buffer areas
- Drainage channels will taper before buffer zones to filter sediment
- Use brush mats to protect soil; suspend work during heavy rain
- Refuelling only 100m from watercourses with strict controls in place
- Silt traps will be used to prevent siltation from run off and daily water quality monitoring and inspections will occur.

Design controls will be implemented such as:

Source controls:

Interceptor drains, vee-drains, diversion drains

Small working areas, covering temporary stockpiles, weathering off of side-cast peat/spoil and cessation of works.

In-Line controls:

Interceptor drains, vee-drains, temporary sumps/attenuation lagoons, sediment traps, pumping

systems, settlement ponds, temporary pumping chambers, or other similar/equivalent or appropriate systems.

Treatment systems:

Temporary sumps and attenuation ponds, temporary storage lagoons, sediment traps, and settlement ponds, and proprietary settlement systems such as “Siltbuster”, and/or other similar/equivalent or appropriate systems.

Runoff from Peat and spoil Storage Areas will be managed by:

- Peat Reuse: Excavated peat will be used for site landscaping, borrow pit reinstatement, and placed in three designated management areas outside 50m buffer zones
- Enhancement Area: Peat will also be used in a proposed peatland enhancement area with drainage mitigation measures
- Runoff Control: Silt fences, straw bales, and biodegradable matting will manage runoff; ‘Siltbuster’ systems used if needed
- Drainage Design: Runoff will be treated via swales, stilling ponds, and a ‘Siltbuster’ system designed for a 1-in-10-year storm event
- Stabilisation: Reinstated areas will be sealed and vegetated quickly to prevent sediment runoff once stabilized.

Construction of the Site drainage system will only be carried out during periods of low rainfall, and therefore minimum runoff rates will occur.

Controls to Prevent the Release of Hydrocarbons during Construction and Storage are as listed as:

- All plant will be inspected and certified leak-free before site use
- Refuelling will be done with a mobile double-skinned bowser by trained personnel
- Spill kits, absorbent materials, and drip trays will be used during refuelling
- Fuel storage will be minimized and banded; turbine oil is fully contained
- A refuelling permit system and emergency spill response plan will be in place.

Biodiversity Management and Enhancement Plan (BMEP) and Potential Hydrological/Water Quality Effects will be managed as follows:

All existing dry drains that intercept the proposed works area will be temporarily blocked down-gradient of the works using temporary check dams/silt traps; Check dams/silt fence arrangements (silt traps) will be placed in all existing drains that have surface water flows and also along existing roadside drains; and, a line of silt fencing will be placed where the proposed enhanced area slopes towards a drain.

It is stated that negative impacts on WFD Status and Objectives will be avoided.

It is stated that “there will be no significant effects on GWB or SWB WFD status for the following reasons:

- The Proposed Development does not involve any alteration of drainage patterns, therefore, the quantitative status of the receiving surface and groundwaters will remain unaltered
- There will be no direct discharge from the Site to receiving waters and,
- Mitigation measures for the protection of surface and groundwater water quality will be implemented during the construction phase of the Proposed Development to ensure that there is no deterioration in local or downstream water quality. These mitigation measures will ensure the qualitative status the receiving waterbodies remains unaltered by the Proposed Development”
- It is noted that “Mitigation measures for sediment control during operation are the same as those outlined above for the construction phase and Mitigation measures for control of hydrocarbons during maintenance works are same to those outlined above for construction phase”.

Impacts from the Decommissioning Phase will be avoided and reduced in the following manner:

- Decommissioning impacts will be similar to construction but less severe due to smaller scale
- Site Rehabilitation - Turbine bases and hardstanding areas will be restored using peatland vegetation to promote regrowth
- Runoff Control - Reinstatement will reduce sedimentation and surface water runoff

- Residual Impacts - Soil compaction and fuel contamination risks remain but are reduced.
- Flexible Planning: Restoration methods may evolve over time; flexibility is advised until decommissioning begins
- Selective Removal: Some infrastructure will remain in place if beneficial, such as roads for forestry use
- Substation Removal: The 38kV substation will be disconnected and dismantled; underground cables will be removed
- Material Recycling: Removed components will be sorted, reused, or recycled where possible
- Natural Revegetation: Substation and access areas will be covered with soil and allowed to revegetate naturally.
- Mitigation Measures: Construction-phase practices for fuel leak prevention and soil protection will be applied during decommissioning.

#### In combination Impacts

It is stated that "There no potential for the Proposed Development to contribute to any cumulative adverse effects on any European Site when considered in-combination with other plans and projects".

In conclusion, it is stated that 'the Proposed Development, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site'.

#### Environmental Impact Assessment Report (EIAR) Screening – summary

The EIAR was produced by MKO Planning and Environmental Consultants.

A summary of the Biodiversity and Ornithology Sections of the report are set out as follows:

It is stated that the following surveys were carried out to inform this application:

Date	Survey
Various dates between April and September 2023	Manual Bat Transect Survey
	Ground-level Static Bat Surveys
6 <sup>th</sup> of September 2024	Multidisciplinary Walkover and detailed botanical surveys – Irish Vegetation Classification (IVC)
6 <sup>th</sup> of March 2025	Multidisciplinary Walkover and Aquatic Survey
26 <sup>th</sup> of March 2025	Multidisciplinary Walkover and Aquatic Survey
9 <sup>th</sup> of May 2025	Multidisciplinary Walkover
18 <sup>th</sup> of June 2025	Turbine Delivery Route (TDR) surveys
10 <sup>th</sup> of July 2025	Multidisciplinary Walkover

Two European sites were identified to be within the Zol of the Proposed Development, namely:

- The Gearagh SAC [000108]
- The Gearagh SPA [004109].

The following pNHAs were also identified as being within the likely Zol of the Proposed Development:

Lough Allua pNHA [001065]

The Gearagh pNHA [000108].

#### Hydrological Connections

It is stated that The Gearagh SAC (and pNHA) is hydrologically connected to the Site via several Order 1 and Order 2 streams in the north-eastern portion of the Site. These flow into the River Lee [EPA Code: 19L03] which subsequently has downstream connectivity to the SAC and pNHA.

The SAC and SPA are considered to be within the Zol of the Proposed Development.

It is noted that “the southern section of the Site (including all proposed infrastructure apart from the site entrance road and proposed turbine component turning area) is located in the Owvane River surface water catchment within the Coomhola\_SC\_010 sub-catchment.

The northern section of the Site (limited to the site entrance road and proposed turbine component turning area) is located in the River Lee surface water catchment (Lee(Cork)\_SC\_010). All sub-catchments are located within Hydrometric Area 21 of the South Western River Basin District”.

#### Habitats and Species

It is noted that “Wet heath and Dry heath are mapped within the northern boundary of the Site, with Active blanket bog and Alpine and subalpine heath mapped directly adjacent to the northern boundary”.

It is stated that during a “desktop search (NPWS bryophyte mapper) a total of three protected bryophytes have been recorded within the northeastern portion of the Site. These species include:

Hooked Plait-moss (*Hypnum uncinatum*)

Western Featherwort (*Plagiochila heterophylla*)

Holt’s Scalewort (*Radula holtii*)”.

Kerry Slug is known to occur within the area (hectad W06 and W16) pertaining to the Site. Targeted Kerry slug surveys were undertaken for this protected species (under NPWS Licence No.: C71/2020) and confirmed its presence within the Site.

It is stated that “the Site is located within the current known range for lesser horseshoe bat (*Rhinolophus hipposideros*), common pipistrelle (*Pipistrellus pygmaeus*), soprano pipistrelle (*Pipistrellus pygmaeus*), Daubenton’s bat (*Myotis daubentonii*), brown long-eared bat (*Plecotus auritus*) and Leisler’s bat (*Nyctalus leisleri*). The Site is outside the known range for Natterer’s bat, Nathusius’ pipistrelle and whiskered bat”.

#### Habitat Use / Habitat Take

It is noted that:

“small sections of Turbine 1, 2 and 3 hardstands, sections of new access road, upgrades to existing road, small sections of the temporary construction compound and the borrow pit will be located within Mature conifer habitat, as well as the proposed biodiversity enhancement areas.

“The Proposed Development has been designed to utilise this habitat where possible, to reduce loss of higher value habitats within the Site. Components of the Proposed Development which are located within this habitat type include the existing roads for upgrade, temporary construction compound, sections of Turbine 1, 2 and 3 hardstands, and proposed spoil and management areas”.

“There will be some losses of degraded wet heath which is adjacent to existing road infrastructure to accommodate the hard standing areas for Turbines 1 and 2, upgraded road infrastructure, the met mast the borrow pit, and construction compound”.

“As part of the road widening proposed at the existing entrance to the Site, there is requirement for encroachment into Oak-birch-holly woodland (WN1) type habitat. This

encroachment will be within woodland which presents degraded examples of this habitat, with high beech and willow occurrences”.

“As part of the road widening proposed at the existing entrance to the Site, there is requirement for encroachment into Mixed broadleaved woodland (WD1). This encroachment will be within woodland edge and verges, which presented with high abundance of scrub species such as bramble and gorse”.

### Fauna

It is stated that:

“No signs of badger presence including snuffle holes, latrines, tracks, prints or setts were recorded” and “no signs of otter were recorded during the dedicated aquatic macroinvertebrate surveys carried out along watercourses”

### Bats

One structure (ITM Grid Ref: X 508844 Y 562170) containing potential suitable bat roost features was identified within the Site. No trees with significant suitable PRFs were identified within the search area. The majority of the trees located within the Site consists of commercial conifer plantation stock with no potential or Negligible roosting potential. Manual bat activity surveys were undertaken in spring, summer and autumn 2023. Bat activity was recorded on all surveys. A total of 606 bat passes were recorded across all surveys. In general, common pipistrelle (n=541) was recorded most frequently, followed by soprano pipistrelle (n=57) and Leisler’s bat (n=5). Two instances of Myotis spp. were recorded and one instance of brown long-eared bat was observed.

### Ground-level Static Surveys 2023

In total, 7,558 bat passes were recorded across all deployments. Common pipistrelle (n=6,124) occurred most frequently. Soprano pipistrelles (n= 615) occurred as second most recorded species, followed by brown long-eared bats (n=342), Leisler’s bat (n=253) and Myotis spp. (n= 196). Instances of lesser horseshoe bats (n= 27) and Nathusius’ pipistrelle (n=1) were less numerous.

### Assessment of Significant Effects During Construction Phase

The following habitats and area will be lost during the construction phase:

KER Habitats	Area to be lost/impacted to development footprint or TDR (hectares ha)/meters (m)	Lost to facilitate:
Wet heath (HH3)	0.97ha	Development footprint
Oak-Birch Holly Woodland (WN1)	0.020ha	Development footprint
Mixed Broadleaved Woodland (WD1)	0.042ha	Development footprint
Eroding/ Upland River (FW1)	0.00	n/a
Treelines (WL2)*	316m	TDR
Hedgerow (WL1)*	648m	TDR
Mixed Broadleaved Woodland (WD1)*	0.069 ha	TDR

It is stated that “losses to hedgerows, treelines and mixed broadleaved woodland, will only be cutting back of vegetation to accommodate the wheel arches of the trucks and over sail of the turbine blades. Vegetation will not be felled/removed in these habitats”.

#### Assessment of Potential Effects on Groundwater, Surface Watercourses and Sensitive Aquatic Faunal Species

The following is noted:

Impacts on some of the water courses on site will occur – quality, connectivity and structure.

However, it is stated that the CEMP provides details of how water quality will be protected during the construction of the Proposed Development.

#### Potential Effects on degraded Wet heath (HH3)

Approximately 1.0 ha of degraded wet heath habitat along the edge of an existing access road and conifer plantation will be lost to facilitate the Proposed Development.

It is stated that “All high-quality heath and bog habitats, within the Site have been deliberately avoided in the design of the Proposed Development”.

By way of mitigation, it is stated that “The Biodiversity Management Enhancement Plan (BMEP) provides for the establishment of 2 ha of heath habitat, to ensure that the development results in a net gain of heath habitat”.

Some removal of Mixed Broad-leaved Woodland (WD1) and Oak-Birch-Holly Woodland (WN1) will be required as part of road widening.

By way of mitigation, it is stated that “The BMEP provides for the establishment of 0.7 ha of native riparian habitat, to ensure that the development results in a net gain of woodland habitat”.

Temporary foliage cut back along the Turbine Delivery Route will be required.

By way of mitigation, it is stated that “additional planting of native riparian woodland will occur either side of a mapped watercourse within the Site. Total additional planting will amount to 0.7 ha, with the extent and location ensuring that new permanent, native commuting and foraging corridors will be established. This additional replanting will result in an overall net gain in linear habitat, as a result of the Proposed Development”.

In terms of Habitat Loss/Fragmentation, it is stated that “Significant effects regarding habitat destruction, barrier effect, disturbance and mortality are not anticipated as a result of the Proposed Development”.

#### Potential Effects on Kerry Slug

It is stated that “The permanent loss of 8.8 ha of Conifer plantation(WD4)/Recently felled woodland (WS5), 0.97 ha of wet heath, and smalls sections of woodland margins habitat is not considered to be a significant effect on Kerry Slug, at any scale greater than the local geographical scale, as these habitats are widespread and common in uplands surrounding the Site”.

By way of mitigation, it is stated that “ BMEP in Appendix 6-5 provides for the enhancement of 5.75 ha of suitable habitat via peatland enhancement and felling of forestry within the Site” and appropriate translocation methods will be employed” and “ Tree stumps resulting from the felling of forestry will be left in situ to decay to provide suitable habitat for Kerry Slug. Rock outcrops, boulders and stone walls will be retained where possible or, if removal can’t be avoided, they will be replaced to enhance the value of the habitat surrounding the windfarm infrastructure”.

#### Potential Effects on Bats

It is stated that “The Proposed Development is predominantly located within conifer plantation and peatland habitats, with existing infrastructure present. There will be no net loss of linear landscape features for commuting and foraging bats and there will be no loss of any roosting site of ecological significance” and “significant residual effects on bats as a result of loss or damage to commuting and foraging habitat, loss of, or damage to, roosts, displacement of individuals or populations, and disturbance, are not anticipated”.

#### Effects on surface watercourses

It is stated that “Following the implementation of the mitigation measures outlined in the CEMP, Surface Water Management Plan and through appropriate design” that “ no potential for significant effects has been identified at any geographic scale as a result of the Proposed Development”.

#### Potential Effects on Bats

The following high-risk species were recorded during the dedicated surveys:

- Leisler’s Bat
- Common pipistrelle
- Soprano pipistrelle
- Nathusius’ pipistrelle.

It is stated that “ A potential for long-term negative effects was identified for Leisler’s bat, common pipistrelle, soprano pipistrelles, and Nathusius’ pipistrelle due to the low-moderate levels of activity recorded in summer within the Site and their classification as high-risk species. The potential unmitigated effects on these high-risk species as a result of their potential interaction with wind turbines are considered significant at a local geographic scale only. No significant effects are anticipated at any other geographic scale”.

By way of mitigation, it is stated that “ In order to reduce the value of the habitat for bat species in the areas surrounding the turbines, a buffer of at least 50m between the tip of the blade and any trees or other tall vegetation that could provide high quality foraging habitat for bat species will be implemented” and the following shall be implemented:

- Tree felling buffer around turbines
- Implement blade feathering as a standard
- Lighting and noise restrictions

- Implement curtailment, as required, on proposed turbines which recorded high median activity levels.
- A minimum of three years operational monitoring to assess changes in bat activity patterns post construction and to monitor the implementation of the mitigation strategy.
- Adaptive mitigation strategy based on the results of the post-construction monitoring.

#### Decommissioning Phase

Regarding the decommissioning phase, it is stated that “The same mitigation to prevent significant impacts on water quality and associated aquatic fauna and other terrestrial fauna during construction will be applicable to the decommissioning phase. It can be concluded that following the implementation of preventative mitigation, there is no potential for the decommissioning of the Proposed Development to result in significant effects on biodiversity”.

#### In Combination Effects

The report noted several other wind farms in the vicinity (within 10km), namely:

Wind Farm	Planning Status	Number of Turbines	Separation Distance (km to nearest turbine)	County
Kealkill Wind Farm	Permitted	10	0.00	Co. Cork
Maughanaclea Wind Farm	Pre App	14	4.01	Co. Cork
Gortloughra Wind Farm	Refused	8	5.28	Co. Cork
Shehy More Wind Farm	Permitted	3	6.44	Co. Cork
Grousement Wind Farm	Permitted	38	7.16	Co. Kerry
Derragh Wind Farm	Permitted	6	9.52	Co. Cork

However, in combination effects associated with these other windfarms are ruled out.

In conclusion – it is stated that “The potential for effects on the European Designated Sites is fully described in the Natura Impact Statement that accompanies this application. The NIS concludes that in view of best scientific knowledge and on the basis of objective information, the Proposed Development either individually or in combination with other plans or projects, is not likely to have adverse effects on the European Sites that were assessed as part of the Appropriate Assessment process. Similarly, with the prescribed mitigations in place, there is no potential for impact on any nationally designated site”.

#### Impact on Birds

I note the following: field surveys were undertaken during the survey period October 2022 to March 20251, consisting of two breeding seasons (April – September) and three winter seasons (October – March).

Vantage point surveys were undertaken in accordance with NatureScot guidance (SNH, 2017) to monitor flight activity within the Site and within a 500m radius of the potential turbine positions.

Breeding walkover surveys were undertaken to determine the presence of bird species of high conservation concern and identify probable or confirmed breeding bird activity within the Site and within a 500m radius of proposed infrastructure. Breeding walkover surveys were conducted at over four visits during the core breeding season months April to July 2023 and 2024.

Breeding raptor surveys were undertaken within the Site and within a 2km radius of proposed infrastructure to identify occupied territories and monitor their breeding success near or within the Site. Each breeding raptor location was surveyed once per month during the core breeding season between April and July 2023 and 2024.

Breeding woodcock and red grouse surveys were undertaken within suitable habitat at the Site and within a 500m radius of proposed infrastructure as well as winter walkover surveys.

Waterbird surveys were also carried out at suitable distances from the site.

It is noted that the Site was previously surveyed from April 2018 to March 2020 and that Contemporary surveys were undertaken between October 2022 to March 2025.

The following species were observed during surveys and are discussed within the EIAR for the application: golden plover, hen harrier, short-eared owl, chough, peregrine, white-tailed eagle, buzzard, sparrow hawk, barn owl, red grouse, herring gull, buzzard, sparrowhawk, kestrel, snipe, meadow pipit, ring ouzel, redwing and grey wagtail.

The species were recorded at different numbers in terms of presence at the habitat or fly overs.

Some of the species were recorded as possible, not likely and identified in terms of breeding roosts. However, it is stated that "no regularly used roosts were identified".

An assessment of direct habitat loss, disturbance/displacement and collision risk was completed for Peregrine, white tailed eagle, kestrel, snipe and sparrowhawk.

The potential for impacts on these targeted species for all seasons was considered to be low to very low.

No pathways for significant effects were identified for the other species identified.

Effects on Key Ornithological Receptors during Construction and Operation are noted as Direct Habitat Loss, Displacement and Barrier Effect, disturbance and collision risk.

In terms of mitigation, the following is stated:

- The Proposed Development avoids wildlife refuge sites (e.g., waterbodies)
- Hard standing areas have been designed to the minimum size necessary to accommodate the turbine model that is selected
- The turbine delivery route has been selected to utilise built infrastructure i.e., public roads
- The Biodiversity Management and Enhancement Plan has been designed to not have a negative effect on avian receptors.

A number of measures are also outlined in the CEMP:

- Timing of Works: Construction will begin outside the bird nesting season (March 1st to August 31st)
- If works extend into the next season, pre-construction bird surveys will guide decisions
- Noise Management: Noise levels, equipment choice, and working hours (avoiding dawn/dusk) will be managed to reduce disturbance to birds
- Equipment Compliance: All machinery will meet EU noise emission regulations (SI 632/2001) and be turned off when not in use
- Watercourse Protection: Measures will be implemented to protect bird habitats near watercourses, as detailed in Chapter 9 of the EIAR
- Sensitive Species Protection: If high-conservation bird species are found nesting or roosting, a disturbance buffer will be enforced, and no work will occur within it until the site is vacated
- Environmental Oversight: An Environmental Clerk of Works and a Project Ecologist will be appointed to oversee ecological compliance
- Bird Surveys: Pre-construction and ongoing bird surveys will be conducted to avoid significant impacts on bird populations
- On-site Education: Site personnel will be informed about ecological sensitivities and best practices
- Ornithological Management: The site ecologist will manage bird-related issues during construction and provide expert advice as needed
- Regulatory Liaison: Regular updates will be provided to relevant authorities to ensure transparency and compliance.

It is stated that “No significant operational phase impacts requiring mitigation were identified”

and “During the decommissioning phase, disturbance limitation measures will be as per the construction phase and are also set out within the Decommissioning Plan”.

#### Invasive Species

An Invasive Species Management Plan is presented in Appendix 4 of the document.

Rhododendron (*Rhododendron ponticum*) was recorded at 3 locations within the site.

Japanese Knotweed (*Reynoutria japonica*) was not recorded within the Site, it was recorded at six locations on road verges along the proposed Turbine Delivery Route (TDR).

It is noted that “Infestations of all invasive species identified within the Site during surveys undertaken in 2024 and 2025 will require additional surveys within the relevant growing season prior to commencement of any works to determine if the recorded species have spread further throughout the Site”. And “Any First or Third Schedule Invasive species and their established buffers that are located outside of the construction footprint will be left undisturbed and will not be the subject of any management as part of the current proposal. All such areas will be avoided during construction activities to avoid potential spread of any invasive plant species”.

## Noise

To mitigate against noise impacts during construction, the following measures are proposed:

- Limiting the hours during which site activities likely to create high levels of noise or vibration are permitted
- Establishing channels of communication between the contractor/developer, Local Authority and residents
- Monitoring typical levels of noise and vibration during critical periods and at sensitive locations
- Selection of plant with low inherent potential for generation of noise and/ or vibration where practical
- Placing of noise generating / vibratory plant as far away from sensitive properties as practical within the site constraints, and
- The hours of construction activity will be limited to avoid unsociable hours where possible. Construction operations shall generally be restricted to between 7:00hrs and 19:00hrs Monday to Saturday.

## Peat Stability Assessment

It is stated that:

“A walkover survey, including intrusive peat depth probing, ground investigation, desk study, stability analysis and risk assessment was carried out to assess the susceptibility of the Site to peat failure following the principles in “Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments” (2nd Edition, Scottish Government, 2017).

Peat thicknesses recorded during the site walkovers from 354 probes ranged from 0.0 to 5.5m with an average depth of 0.45m. 95% of the probes recorded peat depths of less than 1.5m. The average peat depth at any of the proposed turbine locations is 0.3m.

Slope inclinations at the main infrastructure locations range from 6 to 10 degrees.

Peat stability analysis was carried out at 92 locations, and it is stated that “the Site has an acceptable margin of safety, a low risk of peat failure and is suitable for the Proposed Development”. The findings include recommendations and control measures for construction work in peat lands to ensure that all works adhere to an acceptable standard of safety.

## **5 Assessment**

### EIAR

A comprehensive EIAR was submitted as part of this application.

I have reviewed the Biodiversity, Ornithology and other ecologically relevant sections of the report.

### Habitats and Species

Wet heath and Dry heath are mapped within the northern boundary of the Site, with Active blanket bog and Alpine and subalpine heath mapped directly adjacent to the northern boundary.

Three protected bryophytes have been recorded within the northeastern portion of the Site. These species include: Hooked Plait-moss (*Hypnum uncinatum*), Western Featherwort (*Plagiochila heterophylla*) Holt's Scalewort (*Radula holtii*).

### Kerry Slug

Kerry Slug is known to occur within the area (hectad W06 and W16) pertaining to the Site. Targeted Kerry slug surveys were undertaken for this protected species (under NPWS Licence No.: C71/2020) and confirmed its presence within the Site.

I note that a derogation licence has been obtained from the Department of Housing, Local Government, and Heritage for the disturbance and translocation of the Kerry slug (ref. DER-KERRY SLUG-2025-06, valid between 9th October - 31st December 2025, inclusive)

A total of 5.75 ha of the Site will be enhanced for Kerry slug.

A comprehensive translocation methodology was submitted with the application as well as a suite of habitat creation measures.

As per the EIAR, provided that the proposed development is constructed, operated and decommissioned in accordance with the design, best practice and translocation methods that is described within this application, significant impacts on the Kerry Slug are not anticipated.

### Ornithology

The applicants have completed two full years (winter and breeding season) of ornithological surveys at this site. I am satisfied that the survey methods and survey effort are sufficient to provide a comprehensive description of the level of importance of this site for birds. The applicants have followed best practise in terms of impact assessment, identifying the key bird species recorded at the site which could be vulnerable to impact, and they have considered all potential sources of impact to these species.

A number of bird species which are known to be potentially vulnerable to impact from wind farms were identified as occurring within and near the site during surveys.

However, no potential for significant effects on populations of any species of bird identified to be key ecological receptors has been identified.

I am satisfied that the surveys indicate that the area is not a critical breeding site, roosting site or foraging area for any particularly sensitive species, and the site is not identified to be on any significant bird migration route.

Measures are proposed to minimise risks of impact to birds. These include controls on seasonal and diurnal timing of works, control of noise, completion of pre-construction bird surveys and engagement of an ecological clerk of works and post construction monitoring to include targeted bird collision surveys.

### Ornithology Conclusion

As per the EIAR, provided that the proposed development is constructed, operated and decommissioned in accordance with the design, best practice and enhancement measures that are described within the application, significant individual or cumulative effects on the identified Key Ornithological Receptors are not anticipated.

I consider the conclusions of the ornithological report to be acceptable.

### Bats

The Site is located within the current known range for lesser horseshoe bat (*Rhinolophus hipposideros*), common pipistrelle (*Pipistrellus pygmaeus*), soprano pipistrelle (*Pipistrellus pygmaeus*), Daubenton's bat (*Myotis daubentonii*), brown long-eared bat (*Plecotus auritus*) and Leisler's bat (*Nyctalus leisleri*). The Site is outside the known range for Natterer's bat, Nathusius' pipistrelle and whiskered bat.

I note that Bat surveys were undertaken in 2023, in accordance with NatureScot Guidance (NatureScot, 2019). The bat surveys included roost survey, manual transect surveys and ground-level static surveys.

One structure containing potential suitable bat roost features was identified within the Site. I note that the structure will be retained and no building works on this structure are proposed as part of the Proposed Development.

No trees with significant suitable Potential Roost Features (PRFs) were identified within the search area. I note that the majority of the trees located within the Site consists of commercial conifer plantation stock with no potential or negligible roosting potential.

I note that Glanlough Woods SAC is designated for lesser horseshoe bat. However, the Site is located outside of the 2.5km core foraging range for this species (NPWS, 2018).

Carriganass Castle pNHA is known to historically support a nursery roost of Daubenton's bats. Daubenton's bats have a core sustenance zone of approximately 2km (Collins, 2023). This pNHA is located 5.1km from the Site which is outside of Daubenton's bats core sustenance zone

I note that Site-level collision risk for bat species is classified as Low to Medium.

I am satisfied that no significant effects with regard to loss of commuting and foraging habitat for bats nor displacement of individuals or populations are anticipated as part of the project.

I am satisfied, that provided that the Proposed Development is constructed, operated (including blade feathering and lighting restrictions) and decommissioned in accordance with the design and best practice that is described within the EIAR, there will be no significant effects on bats.

### Badgers and Otters

I note that a suite of multidisciplinary surveys and searches for indications of badger were carried out. The badger surveys were conducted in order to determine the presence or absence of badger signs within and outside (areas of identified suitable habitat) the Proposed Development footprint and the Site.

I note that no signs of badger presence including snuffle holes, latrines, tracks, prints or setts were recorded and that no signs of otter were recorded during the dedicated aquatic macroinvertebrate surveys carried out along watercourses.

I am satisfied, that provided that the Proposed Development is constructed, operated and decommissioned in accordance with the design and best practice measures that is described within the EIAR, there will be no significant effects on badgers or otters.

#### Habitat Loss

I note that the proposed development will be located primarily within conifer plantation or clear fell and use will be made of existing roads associated with the previous windfarm which have not been decommissioned.

Small pockets of the following habitats will be lost due to turbine and met mast construction works and the creation of turning circles: Wet Heath, Oak-birch-holly Woodland, Mixed Broadleaved Woodland and hedgerows.

I note the constraints of the site due to existing overhead power lines.

A review of the habitat maps and aerial imagery indicates that intact upland habitats have been avoided to a large extent.

#### Habitat enhancement

I note that it is proposed to establish 2 ha of peat habitat to ensure that the development results in a net gain of peat habitat.

#### Wet Heath Removal

To facilitate the Proposed Development, there will be a requirement to remove approx. 0.9 ha of wet heath habitat. I note that this habitat is highly degraded due to existing drainage and grazing pressures within the Site.

I note that the following steps will be undertaken, under the supervision of an ecological clerk of works, to re-establish this habitat:

- Conifer trees within the area proposed for peatland enhancement will be felled, cutting the stumps as low as possible. Any existing forestry drains within this area will be blocked using excavated peat sods and/or the felled trees
- Where excavations are required outside of existing heath habitat, the top 50cm of peat will be used to cover the stumps within the enhancement area. This will ensure a seed bank of local provenance will be used in the enhancement area.

I note that peat probes of the enhancement area have confirmed sufficient peat depth for heath habitats to establish where existing heath habitat is proposed to be lost within the Site, the vegetation layer along with the top 50cm of peat will be removed and kept intact. This will then be placed vegetation layer up, where possible, within the peat enhancement area, covering the tree stumps. Translocation to the enhancement areas will be done so as soon as is feasible, to ensure the turves do not dry out.

The enhanced areas will then be fenced off to reduce grazing pressure from deer which are known to be present in the area.

### Riparian Zone

I note that it is proposed to plant approx. 350m of riparian woodland either side of a section of the Lackavane river in the southwestern corner of the Site. This will amount to approx. 0.7 ha in area, with a total of approx. 700m of linear habitat

As per the EIAR, provided that the proposed development is constructed, operated and decommissioned in accordance with the design and best practice that is described within the application, significant impacts on habitat ecology are not anticipated.

### Invasive Species

I am satisfied that no Third or First schedule species were identified during the surveys undertaken other than the small patches of rhododendron and Japanese Knotweed identified occurs on site.

I am satisfied that, on implementation of the invasive species management plan, invasive species will not present a risk to ecological receptors on site or other connected locations during the construction, operational and decommissioning phase of the development.

### Hydrological Connections

The Owenbeg and Owvane rivers are not hydrologically connected to any European Site. The rivers merge downstream to the southwest and discharge to Bantry Bay at Ballylickey. The other river in the northern portion of the site forms part of the River Lee surface water catchment and is hydrologically connected to Lough Allua (Lee catchment). Lough Allua is a pNHA described as At Risk due to nutrient pressures. Lough Allua is hydrologically connected to the Gearagh SPA and SAC.

I note the measures outlined in the Hydrology and Hydrogeology section of the EIAR, CEMP, Drainage Management Plan such as the installation of check dams, buffer zones, cut off drains, silt fences, avoidance of water bodies where feasible and design measures (source controls, in-line stream controls, treatment systems) which will reduce the risk of entrainment of suspended solids and nutrient release to surface watercourses.

I note the groundwater vulnerability across the majority of the site is noted as Extreme vulnerability (i.e. <3m peat and subsoil combined).

However, I am satisfied that due to the low permeability nature of the bedrock aquifer underlying the Site, groundwater flow paths are likely to be short, with recharge emerging close by at seeps and surface streams. Therefore, there is a low potential for groundwater dispersion and movement within the aquifer.

I am satisfied that, provided the measures mentioned in the EIAR are implemented; there will be no risk to surface water or groundwater during the construction, operational and decommissioning phase of the development.

### Freshwater Pearl Mussel

I note that the Site lies within Freshwater Pearl Mussel (*Margaritifera margaritifera*) sensitivity areas; Lee Upper and Owvane. Both catchments are designated as 'Catchments of other extant populations' of pearl mussel.

There are a number of streams and rivers within and in close proximity to the Site. Those in the northern section of the Site drain into the Lee Upper Freshwater Pearl Mussel (FWPM) catchment while those in the southern section drain into the Owvane. I note that based on data from NPWS, the nearest Freshwater Pearl Mussels recorded downstream of the Site are in the River Lee, are approximately 6.5 km (hydrological distance) from the Site boundary.

However, I am satisfied that, provided the measures identified in the Hydrology and Hydrological sections of the EIAR are implemented; there will be no risk to the Freshwater Pearl Mussel downstream from the site during the construction, operational and decommissioning phase of the development.

### AA Screening

Given the lack of connectivity to the other Natura sites, only The Gearagh SAC and SPA are considered for AA Screening.

The applicants have submitted an Appropriate Assessment Screening Report in support of their application. The screening report identifies all European sites within 20km of the proposed development as well as all sites with a hydrological linkage to the proposed development site and provides a listing of their qualifying interests.

The assessment identifies a hydrological linkage between the proposed development site to the Gearagh SAC and to the Gearagh SPA, given the location of part of the development site within the Lee catchment. Potential for significant negative impacts on these two sites was ruled in, and the applicants have determined that AA is required and have submitted a Natura Impact Statement in support of their application. No potential for impact on any other EU site was identified. This conclusion is based on the lack of hydrological or other ecological linkages identified as occurring.

The Natura Impact Statement includes a description of the relevant sites and identifies the potential source of impact to these sites to be associated with the hydrological connectivity, the risk of impact to water quality and to natural hydrological processes.

I note the measures outlined in the Hydrology and Hydrogeology section of the EIAR, CEMP, Drainage Management Plan such as the installation of check dams, buffer zones, cut off drains, silt fences, avoidance of water bodies where feasible and design measures (source controls, in-line stream controls, treatment systems). These water pollution protection measures will reduce the risk of entrainment of suspended solids and nutrient release to surface watercourses.

I am satisfied that, provided these measures are implemented; there will be no risk to the Qualifying Interests or the Conservation Objectives (species or habitats) of The Gearagh SAC and SPA.

## **6 In Combination Effects**

I note that there are several other wind farm developments in the area; specifically: Gortlochra (5km away), Shehy More (6km away), Grousement (7km away) and Derragh (9km away).

However, I am satisfied that where the potential for any adverse effect on any European Site has been identified, the pathway by which any such effect may occur has been cut off

through the use of avoidance and appropriate design measures submitted by the applicant. The measures will ensure that the construction, operation and decommissioning of the Proposed Development does not adversely affect the integrity of European sites.

I am satisfied that there is minimal potential for the Proposed Development to contribute to any cumulative adverse effects on any European Site when considered in-combination with other plans and projects.

## **7 Conclusion**

I am satisfied that the proposed development, on its own and in combination, will not give rise to significant negative effects on habitats of high natural value, or on protected species subject to the strict implementation of and adherence to the environmental control and habitat and species management measures proposed.

I have no objection to permission being granted with the attachment of the following conditions:

### **Conditions/Reasons**

Kevin Ryan,  
Senior Executive Scientist,  
15<sup>th</sup> December 2025



Signed by Kevin Ryan on 15/12/2025

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15-Dec-2025