TOBIN

An AtkinsRéalis Company

Appendix A-
An Coimisiún Pleanála
Further Information Letter

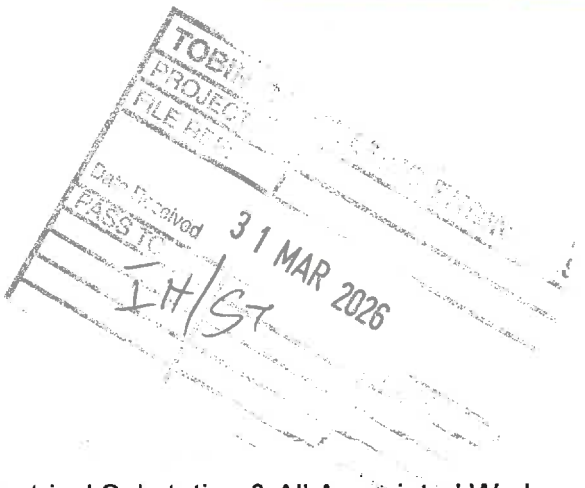
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BUILT ON KNOWLEDGE

Our Case Number: ABP-322485-25

Your Reference: Bord na Móna Powergen Ltd

An Coimisiún Pleanála



Tobin
Block 10-4
Blanchardstown Corporate Park
Dublin
Dublin 15

Date: 30 March 2026

Re: 22 no. Wind Turbines & 1 no. 110kV Electrical Substation & All Associated Works.
Within the townlands of Aghamore, Annaghbeg, Ards, Ballynakill, Barnacor, Cloonbearla, Cloontabeg, Derraghan Beg/More, Derryad, Derrynaskea, Grillagh, Kilmakinlan, Kilnacarrow, Lyneen, Mosstown, Mount Davys, Rappareehill, at Lanesborough, Co. Longford, Ballypheasan, Co. Roscommon. (https://www.derryaddwindfarmplanning.ie)

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above mentioned proposed development which is before the Commission for consideration.

Please be advised that the Commission, in accordance with section 37F(1)(a) of the Planning and Development Act 2000, as amended, hereby requires you to furnish the following further information in relation to the proposed development:

1. The Commission notes that since the planning application was lodged, site specific conservation objectives have been published for Lough Ree SPA (004064) (NPWS, April 2025).

   The applicant is requested to provide an updated detailed assessment of the implications of the proposed development in view of the site-specific conservation objectives and the attributes and targets required to meet these objectives for the species for which the SPA is designated.

   Of particular concern is impacts on the listed population of **Whooper Swan**, the conservation objective of which is to **restore favorable conservation condition**.

   The Commission is of the view that the assessment based on generic conservation objectives presented in the Natura Impact Statement is not adequate to address implications for the integrity of the SPA in view of the site specific conservation objectives in particular those which relate to ecologically important areas outside of the SPA of which the proposed development site could be considered to comprise, now, and in the future in view of bog rehabilitation plans.

   The revised assessment should consider all potential impacts against targets and attributes as relevant to the listed bird species and where the conservation objective is to restore favorable

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conservation condition, provide detail on how the proposed development (alone or in combination with other plans and project) will not delay or prevent that objective for the SPA.

In addition, the Commission seeks clarification on the exact population levels used in the estimation of increase in background mortality as part of the Collision Risk Model assessment for the Lough Ree **SPA populations.** The Commission notes that the significance of predicted collision risk is considered at National scale and regional or local scale as described in the Collision Risk Model Report, EIAR Appendix 8.4 prepared by Tom Gittings. The population reference level used for Lough Ree appears to incorporate a wider area (see Section 2.7, page 22) and thus higher numbers of birds than for which the SPA baseline was determined. Therefore, that being the case, the Commission requests that an updated estimate of mortality thresholds is provided for the relevant species listed for Lough Ree as defined by the **SPA population** cited in the Conservation objectives.

The updated assessment for Lough Ree SPA should be provided as an addendum to the Natura Impact Statement and should include a revised screening stage and detailed assessment (stage 2) in view of the site specific conservation objectives to inform the Commission's Appropriate Assessment of the implications of the proposed development on the integrity of the SPA.

2. The Commission notes the concerns outlined in the submissions received regarding the interplay between the draft cutaway bog decommissioning and rehabilitation works on the proposed wind farm development, the baseline characterisation and the dynamic nature of the site, and concerns that baseline surveys are unlikely to capture the current improved ecological value of the site arising from natural regeneration.

   It is also noted that decommissioning works on the site are still ongoing and an application for substitute consent for historic peat harvesting is currently before the Commission.

   Having regard to the above, the Commission seeks clarity as to whether the EIAR baseline represents the findings at the time of surveys or whether consideration has been given to the likely future receiving environment following further bogland rehabilitation and completion of decommissioning on site.

   In carrying out the EIA, it is necessary to measure impact against a definitive baseline to appropriately assess the actual impact of the proposed development thereby requiring clarity on the appropriate environmental baseline. This is particularly the case for the water, soils, climate and biodiversity environmental factors.

   The applicant should, therefore, consider the presentation of two scenarios ("existing" and "likely future receiving environment") as the environmental baseline for the relevant environmental factors addressed in the EIAR and a revised EIAR or an Addendum to the existing EIAR should be submitted to the Commission.

3. Provide an estimation of carbon emissions in a "do nothing" and a "do something" scenario taking into consideration pumped drainage and oxidisation of exposed peat. Provide a baseline of existing CO_2 emissions from existing drainage and assess the carbon emission benefits of allowing for the site to naturally regenerate as a biodiversity rich carbon sink in the absence of wind farm development.

4. The Response to Submissions Report, Section 11, has set out that the area to be affected by construction and operation of the proposed development is 78ha with 38ha to be reinstated post construction. Therefore, the permanent development footprint is c.40ha for which reinstatement and rehabilitation will not occur if the proposed development is to proceed. Table 18.6 Construction Phase Greenhouse Gas Emissions provides a total value of tonnes CO2e for the construction phase.

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It is recommended that this is updated to take account of the loss of bog area (c.40ha) that would otherwise be rehabilitated if the proposed development were not to proceed.

5. Appendix 7-2 of the EIAR provides Draft Cutaway Bog Decommissioning and Rehabilitation Plans for the site. It has been stated in the EIAR that drainage for the decommissioning and operational phases of the proposed development will be compatible with the Decommissioning and Rehabilitation Plans. It has also been stated in the Surface Water Management Plan (Section 1.1) that the measures implemented for the proposed construction phase will provide flow management for the operational and decommissioning phases.

   The applicant shall provide clarity in regard to how the drainage proposed for the construction phase as set out in drainage layout Drawings 20852-NOD-01-XX-DR-C-0801 to 20852-NOD-01-XX-DR-C-0815 will transition in the decommissioning and operational phases. This has particular relevance to the proposed drainage infrastructure in areas which are within or adjacent to areas proposed to be rehabilitated into wetlands as outlined on Drawing BNM-ECO-23-27-20 in Appendix 7-2 and as to how they will interact and co-exist.

   Where additional design drawings and detail are required, these shall be submitted as part of the response.

The further information referred to above should be received by the Commission within six months from the date of this notice **(i.e. no later than the 30th of September 2026).**

In this regard, please submit 3 hard copies and one electronic copy of the above information.

Please note that following its examination of any information lodged in response to this request for additional information, the Commission will then decide whether or not to invoke its powers under section 37F(2) of the Planning and Development Act 2000, as amended, requiring you to publish notice of the furnishing of any additional information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Commission.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Sinead White

Sinead White
Executive Officer
Direct Line: 01-8737202

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