



An Bord Pleanála
64 Marlborough Street
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Dublin 1
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Our Ref: 190907
Your Ref: ABP-313750-22

7th July 2023

Re: Proposed Wind Farm Development (and all associated works) at Cuilleenoolagh and other townlands, County Roscommon, ABP-313750-22 - Response to request for Further Information.

Dear Sir/Madam,

I refer to your letter dated 13th June 2023, requesting Further Information (FI) in relation to the effects on the environment of the proposed development, in accordance with section 37(F)(1) of the Planning and Development Act, 2000, as amended.

Request for Further Information

The FI request received from the Board is set out as follows;

The Applicant shall liaise with the Department of Housing, Local Government and Heritage, Development Application Unit (DAU) in relation to acquiring copies of the additional data held by it in relation to Greenland white-fronted goose, Whooper swan and Black-headed gull, as referred to in the submission received by the Board from the DAU on 2nd August 2022.

Any resultant changes to the EIAR or NIS analysis and conclusions shall be clearly set out in the response to this request.

Response

SLR Environmental Consulting (Ireland) Ltd (SLR) were commissioned by the applicant in June 2023 to liaise with the Department of Housing, Local Government and Heritage Development Applications Unit (DAU) to obtain and review the relevant data and respond accordingly. The relevant data was provided by National Parks and Wildlife Service (NPWS), via the DAU, by email dated 27th June 2023. SLR have provided a response to the data received in their Response Document which accompanies this Cover Letter at **Appendix 1** and have provided a summary of the additional data received for each species and an assessment of the implications of the additional data received for the conclusions of the EIAR and NIS. The Report concludes as follows,

“The implications of the additional data received for the analysis and conclusions presented in the EIAR and NIS are assessed in Sections 2.1.2, 2.2.2 and 2.3.2 in relation to Greenland white-fronted goose, whooper swan and black-headed gull respectively.

The previous assessments for Greenland white-fronted goose and whooper swan in the EIAR are unchanged by the additional data, i.e., no significant effects on either species are predicted. The assessment made in the NIS, i.e., that there will be no adverse effect on the integrity of any SPA for which Greenland white-fronted goose or whooper swan are a qualifying species, also remains unchanged.

For breeding black-headed gull, the EIAR predicted a potentially significant effect on the regional population. The predicted significant effect was based on a regional black-headed gull breeding



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population of 100 pairs. If the additional data provided by NPWS are used, the regional population is much larger (at least 2,500 pairs) and the collision mortality predicted in the ELAR is likely to be of lower significance, because the predicted mortality will affect a much smaller proportion of the regional population. Based on the additional data provided by NPWS the effect on the regional breeding black-headed gull population is not likely to be significant.

The previous assessment for non-breeding black-headed gull in the ELAR is unchanged by the additional data, i.e., no significant effects are predicted. The assessment made in the NIS, i.e., that there will be no adverse effect on the integrity of Middle Shannon Callows SPA (the only SPA for which black-headed gull is a qualifying species), also remains unchanged.

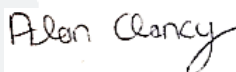
Given that no significant negative effects have been identified following review of the additional data provided, and in some cases effects are likely to be less than originally predicted, there is no requirement for amendments to the NIS or ELAR submitted with the planning application for the Proposed Development.

Please refer to **Appendix 1** of this Cover Letter for full details.

This letter, including appendix, forms a full response in respect of the Further Information Request issued. Two hard copies and one electronic of the response have been provided, as requested by the Board.

I trust the enclosed is sufficient to allow you to continue your consideration of the application. Should you require anything further please do not hesitate to get in touch.

Yours faithfully,



**Alan Clancy BA, MPlan,
Project Planner,
MKO.**

c.c **Energia Renewables ROI Limited**

Encl.

Appendix 1 – SLR Response to Further Information Request.



Appendix 1

SLR Response to Further Information Request.





Response to Further Information Request

Seven Hills Wind Farm (ABP-313750-22)

Energia Renewables ROI Ltd

Prepared by:

SLR Environmental Consulting (Ireland) Ltd

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SLR Project No.: 501.V00501.00005

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Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
0	4 July 2023	Duncan Watson	Jonathon Dunn	Duncan Watson
1	6 July 2023	Duncan Watson	Jonathon Dunn	Duncan Watson

Basis of Report

This document has been prepared by SLR Environmental Consulting (Ireland) Ltd (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Energia Renewables ROI Ltd (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

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1.0 Introduction

1.1 Background

A planning application for the proposed Seven Hills Wind Farm, located in Cuilleenoolagh and other townlands, County Roscommon, was lodged with An Bord Pleanála (the Board) on 7th June 2022 (reference ABP-313750-22).

The Board subsequently invited the applicant (Energia Renewables ROI Ltd) to make a submission on the observations received to the application and a Response to Observations Received was submitted on 31st March 2023.

The Response to Observations Received highlighted that the Department of Housing, Local Government and Heritage Development Applications Unit (DAU), in its observation made on 2nd August 2022, referred to additional data being available “which may assist the Board with its assessment”. The data in question related to Greenland white-fronted goose *Anser albifrons flavirostris*, whooper swan *Cygnus cygnus* and black-headed gull *Chroicocephalus ridibundus*. However, no further details regarding the additional data were provided in the DAU response.

The DAU subsequently refused the applicant’s request for the additional data on the basis that in the case of a live or post-decision development application, it can, in accordance with the statutory provisions, correspond only with the relevant planning authority (the Board in this case), unless the planning authority has specifically instructed the applicant to liaise with the DAU. The applicant therefore requested that the Board specifically instruct the applicant to liaise with the DAU to obtain the additional data so that the applicant could determine its nature, extent and utility and whether it may assist the Board with its assessment of the application.

On 13th June 2023 the Board instructed the applicant to liaise with the DAU to acquire copies of the additional data held by it in relation to Greenland white-fronted goose, whooper swan and black-headed gull, as referred to in the DAU observation. The 13th June 2023 letter from the Board went on to state that “*any resultant changes to the EIAR or NIS analysis and conclusions shall be clearly set out in the response to this request.*”

1.2 Scope of this Document

SLR was commissioned by the applicant in June 2023 to liaise with the DAU to obtain and review the relevant data and respond accordingly. The relevant data were provided by National Parks and Wildlife Service (NPWS), via the DAU, by email dated 27th June 2023.

This document provides a response to the data received. This includes a summary of the additional data received for each species and an assessment of the implications of the additional data received for the conclusions of the EIAR and NIS. A copy of relevant correspondence with the DAU, and copies of the additional data received, are provided in Appendix A.



2.0 Response to Additional Data Received

2.1 Greenland White-fronted Goose

2.1.1 Summary of Data Received

A spreadsheet was provided by NPWS containing counts for Greenland white-fronted goose at Lough Croan Turlough Special Protection Area (SPA). Count data cover the period 2000-2022 and include data collected by the then ranger and Irish Wetland Bird Survey (I-WeBS) data. Peak counts for each winter for which data were provided are summarised in Table A.



Table A: Peak counts of Greeland white-fronted goose at Lough Croan SPA 2000-2022 (data provided by NPWS)

Species / Year	2000-01	2001-02	2002-03	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
Greenland white-fronted goose	227	-	-	-	106	6	31	99	-	170	-	-	-	14	-	13	-	-	43	151	87	88



2.1.2 Implications of the Additional Data Received for the Conclusions of the EIAR and NIS

2.1.2.1 Comparison with Survey Data used in the EIAR and NIS

The EIAR and NIS present the results of feeding distribution surveys for Greenland white-fronted goose and whooper swan within the site of the proposed Seven Hills Wind Farm¹, (henceforth referred to as 'the site'), plus a minimum 1 km buffer, undertaken during the winters of 2018-19, 2019-20 and 2020-21. The results of Greenland white-fronted goose roost surveys at Lough Croan are also presented for the 2019-20 and 2020-21 winters. In addition, a fourth year of non-breeding bird survey, including further feeding distribution and goose roost surveys, was carried out during the winter of 2021-22. The results of the 2021-22 surveys were submitted with the applicant's Response to Observations Received in March 2023.

Peak annual counts of Greenland white-fronted goose provided by NPWS, for the period covered by the surveys undertaken to inform the EIAR and NIS, range between 43 and 151. The peak annual counts of Greenland white-fronted geese at or adjacent to Lough Croan during the surveys carried out to inform the EIAR and NIS between 2018-19 and 2021-22 were as follows²:

- 2018-19: 0
- 2019-20: 153
- 2020-21: 267
- 2021-22: 52

The surveys carried out to inform the EIAR and NIS indicate that usage of Lough Croan by Greenland white-fronted geese is intermittent. Feeding distribution surveys recorded no Greenland white-fronted geese in 2018-19 and 2019-20, while in 2020-21 geese were only recorded on one out of six surveys and in 2021-22 geese were only recorded on two out of 12 surveys. Roost surveys at Lough Croan recorded geese during two out of five surveys in 2019-20, three out of six surveys in 2020-21 and four out of six surveys in 2021-22. A similar pattern is indicated in the NPWS data. These data show that Greenland white-fronted geese were only recorded on three out of six dates for which data were provided in 2019-20 and one out of two dates for which data were provided in 2021-22 (although geese were recorded on all three dates for which data were provided in 2020-21). Older data provided by NPWS indicate that Greenland white-fronted geese were recorded in less than 50% of years between 2000-01 and 2017-18, although the level of survey effort is unknown and may have varied between years. Both data sets (that provided by the applicant and that provided by the DAU) also show that when present, geese numbers can vary substantially over the course of a season.

Given the variability in usage of Lough Croan some deviation in peak counts recorded by different surveys is to be expected. On that basis, the peak count data recorded over the period of joint coverage (2018-19 to 2021-22) are considered to be broadly comparable. It is noted also that the highest counts recorded by NPWS were lower than the highest counts recorded during surveys carried out to inform the EIAR and NIS. The EIAR values the Greenland white-fronted goose population within the study area as internationally important as it is a qualifying species for three SPAs within 15 km and peak counts during baseline

¹ The 'site', as referred to here, includes both the northern and southern clusters.

² Note that peak counts for 2019-20 and 2021-22 include the combined total of all flocks recorded on a single date. There may therefore be some overlap and the counts may overestimate the true number of birds present.



surveys represent >1% of the criteria for international importance stated by I-WeBS (=190). This conclusion is unaffected by the NPWS count data.

2.1.2.2 Habitat Loss, Disturbance / Displacement and Barrier Effects

Lough Croan is located over 1 km from the site. The intervening distance makes it very unlikely disturbance or displacement will impact waterfowl or waders, including Greenland white-fronted goose, at Lough Croan. No significant effects due to habitat loss or disturbance / displacement during construction were therefore predicted in the EIAR or NIS. Similarly, considering the distances involved and the limited number of flights recorded through the site, no significant effects due to disturbance / displacement or barrier effects during wind farm operation were predicted in the EIAR or NIS. As set out in Section 2.1.2.1 (above), Greenland white-fronted goose data provided by NPWS are broadly comparable with survey data collected to inform the EIAR and NIS. In addition, the NPWS data relate only to Lough Croan, over 1 km from the site, so do not affect the previous assessment of habitat loss, disturbance / displacement or barrier effects. As such, the conclusions made in the EIAR, i.e., that no significant effects on Greenland white-fronted goose are likely, remain unchanged. The conclusions made in the NIS, i.e., that there will be no adverse effect on the integrity of Lough Croan Turlough SPA, or any other SPA for which Greenland white-fronted goose is a qualifying species, also remain unchanged.

2.1.2.3 Collision Risk

Collision risk for Greenland white-fronted goose was addressed in Section 7.5.4.2.3 of the EIAR. Collision risk modelling (CRM) was updated to reflect additional survey data collected during the winter of 2021-22 and the updated CRM report was submitted with the applicant's Response to Observations Received in March 2023. However, no Greenland white-fronted geese flights through the site were recorded during flight activity surveys in winter 2021-22 and therefore the estimate of collision risk presented in the EIAR was unchanged.

The CRM undertaken to inform the EIAR predicted a collision rate of 0.054 birds per year for Greenland white-fronted goose. This prediction is unaffected by the NPWS data, which relate to Lough Croan, over 1 km to the north, and not to birds flying through the site.

Section 7.5.4.3 of the EIAR, Section 6.2 of the NIS and Section 3.3 of the updated CRM report submitted with the applicant's Response to Observations Received in March 2023 provide an assessment of the predicted collision risk on relevant qualifying features for nearby European designated sites. This assessment stated, in the context of background annual adult mortality of 28%³, that the predicted collision rate for Greenland white-fronted goose would represent an increase of 0.1-0.4% in background mortality for the Lough Croan Turlough SPA population. An increase in background mortality of <1% is considered unlikely to be significant⁴ and it is therefore unlikely the impact of collision with turbine blades will have a significant effect on the SPA population.

The figures above were based on a reference population for the SPA of 164 (at the time of designation in 2010) and a more recent estimate of 41 from I-WeBS data for the Southern Roscommon Lakes, which includes Lough Croan, from 2008-09 to 2017-18. The survey data collected to inform the EIAR and NIS, and the additional data provided by NPWS, indicate that the Lough Croan Turlough SPA population is currently considerably higher than the figure of 41 used in the EIAR and NIS. If the SPA population is larger, the collision mortality predicted in the EIAR would affect a smaller proportion of the SPA population. For example, if the current SPA population was assumed to be 92 (the mean peak count recorded by

³ BTO Birdfacts: <http://app.bto.org/birdfacts>.

⁴ Percival, S.M. (2003). *Birds and wind farms in Ireland: A review of potential issues and impact assessment*. Ecological Consulting.



NPWS over the period 2018-19 to 2021-22⁵) the increase in background mortality resulting from the predicted collision rate would be 0.21%. This figure is lower than the 0.4% increase predicted in the EIAR and NIS, which was based on a reference population of 41. As such, the conclusion made in the EIAR, i.e., no significant effect on Greenland white-fronted goose due to collision, remains unchanged. The conclusions made in the NIS, i.e., that there will be no adverse effect on the integrity of Lough Croan Turlough SPA, or any other SPA for which Greenland white-fronted goose is a qualifying species, also remain unchanged.

2.2 Whooper Swan

2.2.1 Summary of Data Received

A spreadsheet was provided by NPWS containing counts for whooper swan at Lough Croan Turlough SPA. Count data cover the period 2000-2022 and included data collected by the then ranger and Irish Wetland Bird Survey (I-WeBS) data. Peak counts for each winter for which data were provided are summarised in Table B.

In addition, NPWS noted that relevant data from the International Swan Census 2020, which is publicly available, had not been presented in the ecological reports. The results of the International Swan Census 2020⁶ have subsequently been reviewed during the preparation of this response. Of relevance to the assessments presented in the EIAR and NIS, the International Swan Census 2020 recorded an all-Ireland count of 19,111 whooper swans and a count of 557 whooper swans for the River Suck.

⁵ A five year mean peak count would usually be used, but in this case only four years have been used due to a lack of data for 2017-18.

⁶ Burke, B., McElwaine, J.G., Fitzgerald, N., Kelly, S.B.A., McCulloch, N., Walsh, A.J. & Lewis, L.J. (2021). Population size, breeding success and habitat use of Whooper Swan *Cygnus cygnus* and Bewick's Swan *Cygnus columbianus bewickii* in Ireland: results of the 2020 International Swan Census. *Irish Birds* 43: 57–70 (2021).



Table B: Peak counts of Whooper Swan at Lough Croan SPA 2000-2022 (data provided by NPWS)

Species / Year	2000-01	2001-02	2002-03	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
Whooper swan	4	-	18	-	63	44	23	12	29	68	-	61	47	9	8	60	-	76	11	55	29	46



2.2.2 Implications of the Additional Data Received for the Conclusions of the EIAR and NIS

2.2.2.1 Comparison with Survey Data used in the EIAR and NIS

The EIAR and NIS present the results of feeding distribution surveys for Greenland white-fronted goose and whooper swan within the site plus a minimum 1 km buffer, undertaken during the winters of 2018-19, 2019-20 and 2020-21. In addition, a fourth year of non-breeding bird survey, including further feeding distribution surveys, was carried out during the winter of 2021-22. The results of the 2021-22 surveys were submitted with the applicant's Response to Observations Received in March 2023.

Peak annual counts of whooper swan provided by NPWS for Lough Croan, for the period covered by the surveys undertaken to inform the EIAR and NIS, range between 11 and 55. The peak annual counts of whooper swan at or adjacent to Lough Croan during the surveys carried out to inform the EIAR and NIS between 2018-19 and 2020-21 were as follows⁷:

- 2018-19: 14
- 2019-20: 32
- 2020-21: 60

The peak counts recorded over the period of joint coverage (2018-19 to 2020-21) are very similar. Older data provided by NPWS indicate similar numbers at Lough Croan in previous years also (peak counts between 2000-01 and 2017-18 range between four and 76). The EIAR values the whooper swan population within the study area as nationally important as although it is a qualifying species for three SPAs within 15 km, peak counts during baseline surveys represent <1% of the criteria for international importance stated by I-WeBS (=340). This conclusion is unaffected by the NPWS count data.

2.2.2.2 Habitat Loss, Disturbance / Displacement and Barrier Effects

Lough Croan is located over 1 km from the site. The intervening distance makes it very unlikely disturbance or displacement will impact waterfowl or waders, including whooper swan, at Lough Croan. No significant effects on whooper swan due to habitat loss or disturbance / displacement during construction were predicted in the EIAR or NIS. Similarly, considering the distances involved and the limited number of flights recorded through the site, no significant effects due to disturbance / displacement or barrier effects during wind farm operation were predicted in the EIAR or NIS. As set out in Section 2.2.2.1 (above), whooper swan data for Lough Croan provided by NPWS are very similar to survey data collected to inform the EIAR and NIS. In addition, the NPWS data relate only to Lough Croan, over 1 km from the site, so do not affect the previous assessment of habitat loss, disturbance / displacement or barrier effects. As such, the conclusions made in the EIAR, i.e., that no significant effects on whooper swan are likely, remain unchanged. The conclusions made in the NIS, i.e., that there will be no adverse effect on the integrity of any SPA for which whooper swan is a qualifying species, also remain unchanged.

2.2.2.3 Collision Risk

Collision risk for whooper swan was addressed in Section 7.5.4.2.2 of the EIAR. Collision risk modelling (CRM) was subsequently updated to reflect additional survey data collected during the winter of 2021-22 and the updated CRM report was submitted with the applicant's Response to Observations Received in March 2023.

⁷ Note that count data relating specifically to Lough Croan were not provided in the 2021-22 survey report.



The updated CRM predicted a collision rate of 0.1141 birds per year for whooper swan based on survey data for 2018-19 to 2021-22 combined. This prediction is unaffected by the NPWS data, which relate to Lough Croan, over 1 km to the north, and not to birds flying through the site.

Section 7.5.4.3 of the EIAR, Section 6.2 of the NIS and Section 3.3 of the updated CRM report submitted with the applicant's Response to Observations Received in March 2023 provide an assessment of the predicted collision risk on relevant qualifying features for nearby European designated sites. This assessment looks at the extent to which the predicted collision rates would increase background annual mortality rates for the relevant SPA populations. Whooper swan is not a qualifying feature for Lough Croan Turlough SPA and therefore the data provided by NPWS, which relate to Lough Croan only, do not change any of the other SPA population data used in this assessment.

The International Swan Census 2020 data referenced by NPWS refer to a count of 557 whooper swans for the River Suck⁸. The assessment presented in the EIAR and NIS, updated by the March 2023 CRM report, stated that in the context of background annual adult mortality of 19.9%³, the predicted collision rate for whooper swan would represent an increase of 0.29-0.46% in background mortality for the River Suck Callows SPA population. An increase in background mortality of <1% is considered unlikely to be significant⁴ and it is therefore unlikely the impact of collision with turbine blades will have a significant effect on the River Suck Callows SPA population.

The figures above were based on a reference population for the River Suck Callows SPA of 124 (at the time of designation in 1995) and a more recent estimate, from I-WeBS data, of 200 (for the period 2014-15 to 2017-18). The International Swan Census 2020 data indicate that the River Suck Callows SPA population is currently considerably higher than the figure of 200 used in the EIAR and NIS. If the SPA population is larger, the collision mortality predicted in the EIAR would affect a smaller proportion of the SPA population. For example, if the current SPA population was assumed to be 557 (the count made during the 2020 international swan census) the increase in background mortality resulting from the predicted collision rate would be 0.10%. This figure is lower than the 0.29% increase predicted in the EIAR and NIS, which was based on a recent reference population of 200. As such, the conclusion made in the EIAR, i.e., no significant effect on whooper swan due to collision, remains unchanged. The conclusion made in the NIS, i.e., that there will be no adverse effect on the integrity of River Suck Callows SPA (the only SPA within the core foraging range for whooper swan for which whooper swan is a qualifying species), also remains unchanged.

2.3 Black-headed Gull

2.3.1 Summary of Data Received

Information from the local NPWS ranger, who participated in the count of the internationally important breeding population at Lough Ree, referred to a population of at least 2,500 pairs, with over 1,013 nests on one island alone, in recent years. A spreadsheet was also provided containing count data for breeding black-headed gulls at Lough Ree from 2018, along with a map showing sub-sites within Lough Ree. The spreadsheet refers to a total count of 2,480, although it is not clear whether the total count relates to pairs of individual birds. However, based on the above it is assumed to relate to pairs.

⁸ Although not explicitly stated in the International Swan Census 2020 report, it is assumed that the count for the River Suck equates to the River Suck Callows SPA population.



In addition, NPWS noted that Lough Ree has been identified as the top-ranked site in Ireland for breeding waterbirds⁹.

2.3.2 Implications of the Additional Data Received for the Conclusions of the EIAR and NIS

2.3.2.1 Comparison with Survey Data used in the EIAR and NIS

The black-headed gull data provided by NPWS relate solely to Lough Ree, 8 km from the site at its closest point. The NPWS data are therefore not directly comparable with survey data collected within the survey area used during surveys to inform the EIAR and NIS.

However, the additional data supplied by NPWS provide relevant contextual data. Table 7-9 in the EIAR refers to an important black-headed gull breeding colony at Lough Ree (100 individuals) but notes that the species is not a qualifying feature of the Lough Ree SPA (so is therefore not relevant to the appropriate assessment presented in the NIS). The NPWS data indicate that the Lough Ree breeding population is much larger (at least 2,500 pairs). Whilst the Lough Ree breeding colony is clearly at least nationally important (based on the NPWS data), the evaluation presented in the EIAR was based primarily on the usage of the study area, which was generally relatively low and is unaffected by the additional data supplied for Lough Ree. The EIAR therefore values the black-headed gull population within the study area as regionally important. This conclusion is unaffected by the NPWS data.

2.3.2.2 Habitat Loss, Disturbance / Displacement and Barrier Effects

No significant effects on black-headed gull due to habitat loss or disturbance / displacement during construction were predicted in the EIAR or NIS. This is primarily because black-headed gull activity was focussed around Feacle Turlough and Thomas Street Turlough, outside the site. These turloughs are located 730 m and 948 m from the nearest proposed turbine locations respectively, beyond the distance at which disturbance is likely. In addition, any localised disturbance effects to black-headed gull within the site are not likely to be significant given the large size of black-headed gull's foraging range and the wide availability of more optimal, alternative foraging habitats located outside the site. No significant effects due to disturbance / displacement or barrier effects during wind farm operation were predicted in the EIAR or NIS for similar reasons. These conclusions are not affected by the provision of additional data for Lough Ree and as such the conclusions made in the EIAR, i.e., that no significant effects on black-headed gull are likely due to habitat loss, disturbance / displacement or barrier effects, remain unchanged. The conclusions made in the NIS, i.e., that there will be no adverse effect on the integrity of Middle Shannon Callows SPA (the only SPA for which black-headed gull is a qualifying species), also remain unchanged.

2.3.2.3 Collision Risk

Collision risk for black-headed gull was addressed in Section 7.5.4.2.9 of the EIAR. Collision risk was only modelled during the breeding season as insufficient data for the non-breeding season were available and collision risk during the non-breeding season was considered unlikely to be significant. Collision risk modelling (CRM) was subsequently updated to reflect additional survey data collected during the winter of 2021-22 and the updated CRM report was submitted with the applicant's Response to Observations Received in March 2023. However, the updates related only to the non-breeding period and therefore the estimate of collision risk for black-headed gull during the breeding season was unchanged from that presented in the EIAR.

⁹ Lauder, A. & Lauder, C. (2020) Identification of breeding waterbird hotspots in Ireland. Irish Wildlife Manuals, No. 129. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland.



The CRM undertaken to inform the EIAR predicted a collision rate of 0.697 birds per year for black-headed gull during the breeding season. This prediction is unaffected by the NPWS data, which relate to Lough Ree, 8 km away, and not to birds flying through the site.

The EIAR predicted a potentially significant effect on the regional black-headed gull population during the breeding season, although it was noted that collision risk is likely to have been over-estimated due to most flight activity being associated with Feacle Turlough, rather than around the proposed turbine locations. The predicted significant effect was based on a regional black-headed gull breeding population of 100 pairs. If the additional data provided by NPWS are used, the regional population is much larger and the collision mortality predicted in the EIAR is likely to be of lower significance, because the predicted mortality will affect a much smaller proportion of the regional population. For example, whilst the predicted collision rate of 0.697 would represent a 6.97% increase in background mortality rates for a population of 100 birds, if a figure of 5,000 birds (i.e., 2,500 pairs) is used, the increase in background mortality would be much lower at 0.014%. An increase in background mortality of <1% is considered unlikely to be significant⁴ and therefore based on the additional data provided by NPWS for Lough Ree, the effect on the regional black-headed gull population is not likely to be significant.

Black-headed gull is a qualifying species for Middle Shannon Callows SPA during the non-breeding season but is not a qualifying species for any of the other European Sites considered in the NIS. The data provided by NPWS relate only to Lough Ree during the breeding season and do not affect the assessment for non-breeding black-headed gulls at Middle Shannon Callows SPA. The conclusion made in the NIS, i.e., that there will be no adverse effect on the integrity of Middle Shannon Callows SPA, therefore remains unchanged.



3.0 Summary and Conclusions

This submission has been prepared to address the Board's instruction to liaise with the DAU in relation to acquiring copies of the additional data held by it in relation to Greenland white-fronted goose, whooper swan and black-headed gull, as referred to in the DAU's observation of 2nd August 2022. It also addresses the request from the Board to clearly set out any resultant changes to the EIAR or NIS analysis and conclusions in light of any additional data provided.

Data were provided by NPWS, via the DAU, by email dated 27th June 2023. The data are summarised in Sections 2.1.1, 2.2.1 and 2.3.1 in relation to Greenland white-fronted goose, whooper swan and black-headed gull respectively. Copies of the full datasets and associated correspondence are provided in Appendix A.

The implications of the additional data received for the analysis and conclusions presented in the EIAR and NIS are assessed in Sections 2.1.2, 2.2.2 and 2.3.2 in relation to Greenland white-fronted goose, whooper swan and black-headed gull respectively.

The previous assessments for Greenland white-fronted goose and whooper swan in the EIAR are unchanged by the additional data, i.e., no significant effects on either species are predicted. The assessment made in the NIS, i.e., that there will be no adverse effect on the integrity of any SPA for which Greenland white-fronted goose or whooper swan are a qualifying species, also remains unchanged.

For breeding black-headed gull, the EIAR predicted a potentially significant effect on the regional population. The predicted significant effect was based on a regional black-headed gull breeding population of 100 pairs. If the additional data provided by NPWS are used, the regional population is much larger (at least 2,500 pairs) and the collision mortality predicted in the EIAR is likely to be of lower significance, because the predicted mortality will affect a much smaller proportion of the regional population. Based on the additional data provided by NPWS the effect on the regional breeding black-headed gull population is not likely to be significant.

The previous assessment for non-breeding black-headed gull in the EIAR is unchanged by the additional data, i.e., no significant effects are predicted. The assessment made in the NIS, i.e., that there will be no adverse effect on the integrity of Middle Shannon Callows SPA (the only SPA for which black-headed gull is a qualifying species), also remains unchanged.

Given that no significant negative effects have been identified following review of the additional data provided, and in some cases effects are likely to be less than originally predicted, there is no requirement for amendments to the NIS or EIAR submitted with the planning application for the Proposed Development.



Appendix A Correspondence with the DAU and Data Received

Response to Further Information Request

Seven Hills Wind Farm (ABP-313750-22)

Energia Renewables ROI Ltd

SLR Project No.: 501.V00501.00005

6 July 2023



From: Housing Manager DAU <Manager.DAU@npws.gov.ie>

Sent: 27 June 2023 12:30

To: Jonathon Dunn <jdunn@slrconsulting.com>

Subject: RE: ABP reference ABP-313750-22 / DAU reference SID-22-RSC-19: request for additional ornithological information

Apologies for the delay in responding Jonathon.

I had to chase up my colleagues in NPWS again but they have now provided a response. Please see below and attached.

In relation to additional information in relation to Greenland white-fronted goose, whooper swan and black-headed gull, as referred to in the Department's submission received by ABP from the DAU on 2nd August 2022, the then ranger has kindly put together spreadsheets and a map, including their own and previous IWeBs data for the site. See attached.

Regarding Whooper Swan, the International Swan Census 2020 was referenced, which is publicly available, and had not been presented in the ecological reports. See attached spreadsheet for counts of Lough Croan SPA for Greenland white-fronted goose and Whooper Swan.

Regarding Black Headed Gulls: Information was from personal communication from the local NPWS ranger, who had participated in the count of the internationally important breeding population at Lough Ree of at least 2500 pairs, with over 1013 nests on one island alone in recent years. See attached spreadsheet of one count from 2018.

The identification of Lough Ree as the top hotspot of breeding waterbirds in Ireland is referenced in the comments^[1]:

^[1] Lauder, A. & Lauder, C. (2020) Identification of breeding waterbird hotspots in Ireland. Irish Wildlife Manuals, No. 129. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland.

Kind regards,

Edel

From: Jonathon Dunn <jdunn@slrconsulting.com>

Sent: Tuesday 27 June 2023 08:52

To: Housing Manager DAU <Manager.DAU@npws.gov.ie>

Subject: RE: ABP reference ABP-313750-22 / DAU reference SID-22-RSC-19: request for additional ornithological information

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Hi Edel,

Thanks very much for your assistance so far. I am sending another follow-up email to see if NPWS have been able to supply the DAU with the requested data on Greenland white-fronted goose, whooper swan and black-headed gull, please?

ABP has requested that we submit the information requested, along with any resultant changes to the EIAR or NIS analysis, to them by 5:30pm on the 10th July 2023.

Assuming that you were able to get us the data by today, this currently gives us nine working days to interrogate the data, update any relevant impact assessments and have the changes legally reviewed. So, we really need to see sight of this data ASAP if we are to make ABP's deadline.

I understand that NPWS are very busy. If they aren't able to supply the requested data to the DAU soon, it would be very helpful if you were able to find out exactly what the turnaround time might be, as we could request an extension for an appropriate amount of time. If this was possible, it would be very much appreciated.

Kind regards,

Jonathon Dunn

Senior Ecologist - Ecology

☎ +353 1 296 4667

✉ jdunn@slrconsulting.com

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7 Dundrum Business Park, Windy Arbour, Dublin Ireland D14 N2Y7



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From: Housing Manager DAU <Manager.DAU@npws.gov.ie>

Sent: 23 June 2023 08:11

To: Jonathon Dunn <jdunn@slrconsulting.com>

Subject: RE: ABP reference ABP-313750-22 / DAU reference SID-22-RSC-19: request for additional ornithological information

Good morning Jonathon,

I have emailed my colleagues again in NPWS for this information. I advised of your deadline and that you need this information quickly. I will revert back to you as soon as I hear back from them.

Kind regards,

Edel

From: Jonathon Dunn <jdunn@slrconsulting.com>

Sent: Friday 23 June 2023 07:04

To: Housing Manager DAU <Manager.DAU@npws.gov.ie>

Subject: RE: ABP reference ABP-313750-22 / DAU reference SID-22-RSC-19: request for additional ornithological information

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Hi Edel,

I hope all is well with you?

I was just wondering if there was any update on this data request, please? We will need to ask ABP for an extension to the FIR deadline if the data is not received soon.

Kind regards,

Jonathon Dunn

Senior Ecologist - Ecology

O +353 1 296 4667

E jdunn@slrconsulting.com

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From: Housing Manager DAU <Manager.DAU@npws.gov.ie>

Sent: 15 June 2023 18:34

To: Jonathon Dunn <jdunn@slrconsulting.com>

Subject: RE: ABP reference ABP-313750-22 / DAU reference SID-22-RSC-19: request for additional ornithological information

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Good evening Jonathon,

On behalf of the Department of Housing, Local Government and Heritage I wish to acknowledge receipt of your email below.

I have sent your email on to my colleagues in NPWS and have asked for them to send on the information you have requested below.

Kind regards,

Edel

From: Jonathon Dunn <jdunn@slrconsulting.com>

Sent: Thursday 15 June 2023 09:21

To: Housing Manager DAU <Manager.DAU@npws.gov.ie>

Subject: RE: ABP reference ABP-313750-22 / DAU reference SID-22-RSC-19: request for additional ornithological information

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Dear Sinéad,

Thank you for your email. Please see the attached letter from ABP which has requested that the applicant liaise with the DAU in relation to acquiring copies of the additional data held in relation to Greenland white-fronted goose, whooper swan and black-headed gull, as referred to it in the submission received by the Board from the DAU on 2nd August 2022.

I trust that allows you to proceed? Please advise me if anything else is needed.

We have a deadline of 10th July 2023, so if you were able to process the data request as soon as you are able, I would be very appreciated.

Kind regards,

Jonathon Dunn

Senior Ecologist - Ecology

O +353 1 296 4667

E jdunn@slrconsulting.com

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7 Dundrum Business Park, Windy Arbour, Dublin Ireland D14 N2Y7



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From: Housing Manager DAU <Manager.DAU@npws.gov.ie>

Sent: 10 February 2023 18:15

To: Jonathon Dunn <jdunn@slrconsulting.com>

Subject: RE: ABP reference ABP-313750-22 / DAU reference SID-22-RSC-19: request for additional ornithological information

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A Chara

On behalf of the Department of Housing, Local Government and Heritage, I acknowledge receipt of your email which relates to a live planning application for Roscommon, Reference Number ABP-313750-22, that is currently being assessed by An Bord Pleanála who is the competent authority in this case.

In the case of a live or post-decision development application, the Department may, in accordance with the statutory provisions, correspond only with the relevant planning authority.

As an exception can only be made where the deciding authority has specifically instructed the applicant to liaise with the Department in advance of preparing a further information response can you please advise if An Bord Pleanála has given you such instruction? If so a copy of the further information request letter stating same must be provided before the Department can provide any further information.

Kind Regards

Sinéad

—
Sinéad O' Brien
Executive Officer

—
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90
Newtown Road, Wexford, County Wexford Y35 AP90

From: Jonathon Dunn <jdunn@slrconsulting.com>
Sent: Wednesday 8 February 2023 12:47
To: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Cc: Duncan Watson <dwatson@slrconsulting.com>; Tinsley Sara <Sara.Tinsley@energia.ie>; Gallagher Tony <Tony.Gallagher@energia.ie>; Meabhann Crowe <mcrowe@mkoireland.ie>
Subject: ABP reference ABP-313750-22 / DAU reference SID-22-RSC-19: request for additional ornithological information

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Dear Sir/Madam,

I am writing to you regarding the Nature Conservation observations made by the DAU pertaining to the proposed Seven Hills wind farm development in Co. Roscommon (ABP reference ABP-313750-22 and DAU reference SID-22-RSC-19).

In your letter dated on 2 August 2022, you stated that there is additional data available in relation to Greenland white-fronted goose and whooper swan which is not presented in the Environmental Impact Assessment Report (Important Points, page 2). You have also stated the same for the breeding colony of black-headed gulls at Lough Ree SPA (Black-headed Gull, page 7). Please could you provide us with this data referenced in your letter?

Kind regards,



Jonathon Dunn

Senior Ecologist - Ecology & Biodiversity

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The Prince's Responsible Business Network
Race at Work Charter signatory

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^[1] Lauder, A. & Lauder, C. (2020) Identification of breeding waterbird hotspots in Ireland. Irish Wildlife Manuals, No. 129. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland.

Lough Croan 2000-2022

10.02.22

_LATITUDE	_LONGITUDE	BTO	Number	Activity
53.50028663	-8.202145211	WS	23	feeding
53.49385916	-8.185588941	WS	17	feeding

Lough Croan 2000-2022

18.01.21

_LATITUDE	_LONGITUDE	BTO	Numbers	Behaviour
53.49486322	-8.180614449	NW	77	feeding
53.49476529	-8.180298284	PG	3	feeding

Lough Croan 2000-2022

16.12.21

BTO Numbers

WS	38
NW	88
WS	8

Lough Croan 2000-2022

15.12.20

_LATITUDE	_LONGITUDE	_BTO	_Numbers	_Behaviour
53.49151725	-8.169969097	WS	18	roosting
53.49237237	-8.172859512	WS	5	roosting
53.49368782	-8.175054565	WS	6	roosting
53.49461151	-8.177491017	NW	16	feeding
53.49198221	-8.171501979	NW	3	feeding

Lough Croan 2000-2022

19.11.20

_LATITUDE	_LONGITUDE	_BTO	_Numbers	_Behaviour
53.49395231	-8.173642717	NW	87	feeding
53.50130929	-8.198691532	WS	14	feeding

Lough Croan 2000-2022

2019-2020

DATE	<u>LATITUDE</u>	<u>LONGITUDE</u>	<u>BTO</u>	<u>Numbers</u>	<u>Behaviour</u>
27.11.19	53.49061943	-8.170327172	WS	21	roosting
27.11.19	53.49039941	-8.170395903	WS	14	roosting
27.11.19	53.49052767	-8.169898689	NW	15	flying
27.11.19	53.49098107	-8.170496821	NW	16	flying
27.11.19	53.49473099	-8.180604056	NW	9	feeding
27.11.19	53.49463684	-8.180089407	NW	7	feeding
27.11.19	53.49478903	-8.180249669	NW	18	feeding
17.12.19	53.49079656	-8.169586547	WS	16	feeding
17.12.19	53.49228061	-8.173828125	WS	6	feeding
17.12.19	53.49549808	-8.179399408	WS	9	feeding
03.01.20	53.49098027	-8.180531301	NW	151	feeding
20.01.20	53.49662536	-8.180801868	WS	27	feeding
20.01.20	53.49696622	-8.182683773	WS	28	feeding
30.01.20	53.49403309	-8.174206652	NW	46	feeding
25.02.20	53.50167902	-8.198572509	WS	12	feeding

Lough Croan 2000-2022

2018-2019

Date	BTO Numbers	
21.11.18	NW	43
27.02.19	WS	11

Lough Croan 2000-2022

2017-2018

DATE	SPECIES	NUMBERS
201217	WS	5
201217	WS	29
201217	WS	9
150118	WS	18
150118	WS	13
190218	WS	38
190218	WS	9
190218	WS	4
190218	WS	7
190218	WS	5
190218	WS	3
190218	WS	10

Lough Croan 2000-2022

2000-2017

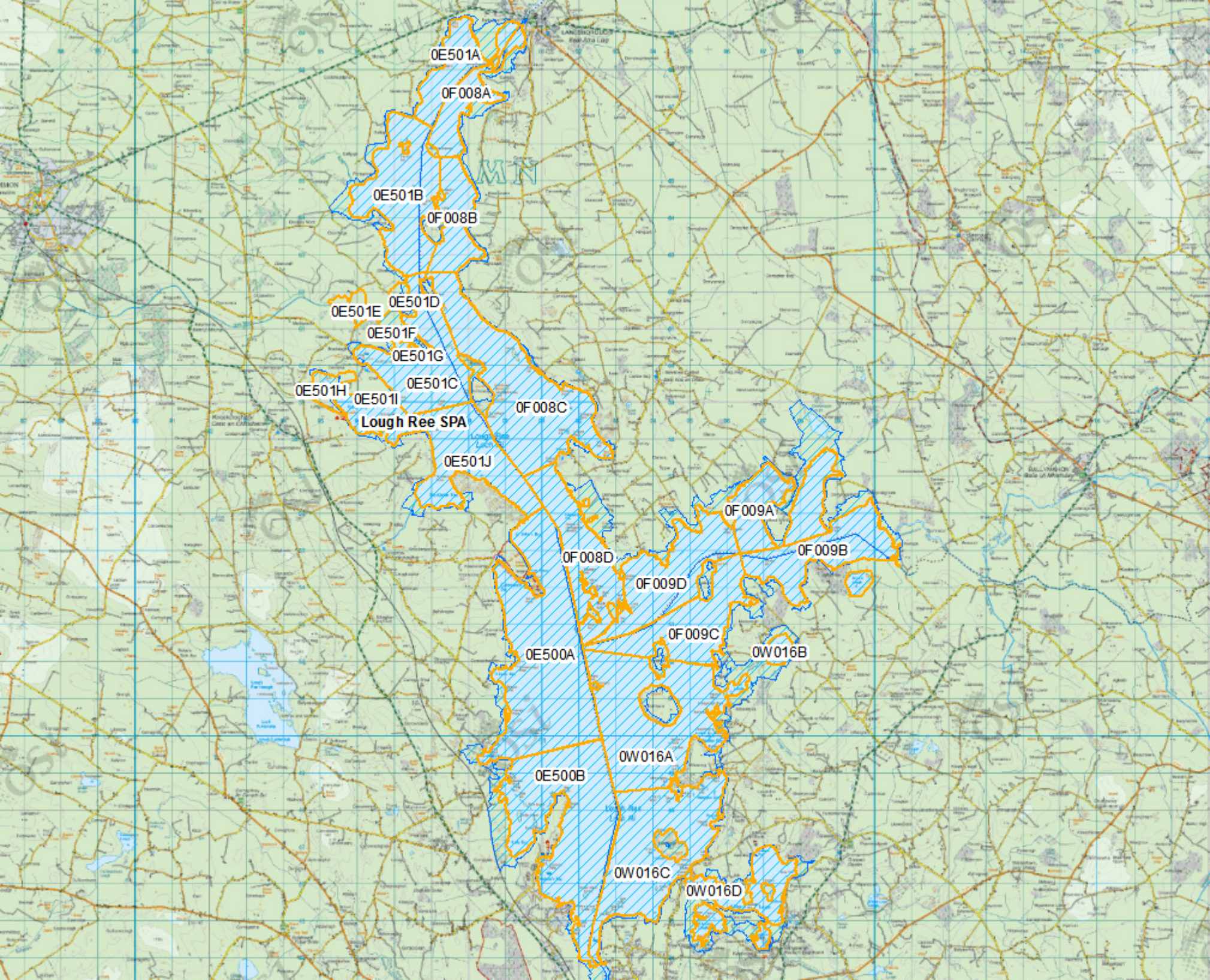
Species	2000/01	2002/03	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17
WS	4	18	63	44	23	12	29	68		61	47	9	8	60	
PG														1	
NW	227		106	6	31	99		170				14		13	

Lough Ree BH gull colony data

2018

Date_1	SPECIES	NUMBER	Lough_Ree_	Sub_Site_D	BREEDING_S	BoCCI	Lough_Re_1	Sub_Site_1	Site_Name
2018-05-24	BH	600	0F008	0F008C	Confirmed breeding	Red (B)	0F008	0F008C	Elfeet Bay
2018-05-24	BH	1500	0F008	0F008D	Confirmed breeding	Red (B)	0F008	0F008D	Black Islands
2018-05-24	BH	20	0F008	0F008D	Confirmed breeding	Red (B)	0F008	0F008D	Pollagh
2018-07-13	BH	100	0F008	0F008D	Probable breeding	Red (B)	0F008	0F008D	Pollagh
2018-05-23	BH	260	0W016	0W016A	Probable breeding	Red (B)	0W016	0W016A	Portlick Bay

NPWS L.Ree subsites



OE501A

OF008A

OE501B

OF008B

OE501E

OE501D

OE501F

OE501G

OE501H

OE501I

OE501C

OF008C

Lough Ree SPA

OE501J

OF008D

OF009A

OF009B

OF009D

OF009C

OE500A

OW016B

OE500B

OW016A

OW016C

OW016D



Making Sustainability Happen