

## WEI Response to the Draft Threat Response Plan for the Hen Harrier 2024-2028

### Introduction

Thank you for providing an opportunity to consult on the draft Hen Harrier Threat Response Plan (HHTRP), SEA Environmental Report and Natura Impact Statement. This submission is made on behalf of Wind Energy Ireland (WEI). WEI is the representative body for the Irish wind industry, working to promote wind energy as an essential, economical and environmentally friendly part of the country's low-carbon energy future. We are Ireland's largest renewable energy organisation with more than 200 members who have come together to plan, build, operate and support the development of the country's chief renewable energy resource.

The wind industry recognises that urgent conservation action is required to protect the national Hen Harrier population from further decline, and we welcome the long-awaited publication of the draft HHTRP and supporting documents. However, we are disappointed with the continuation of a narrative, which we believe is not supported by robust scientific evidence, that onshore wind development is one of the top drivers of hen harrier population collapse.

We are also disappointed with the content of the "plan" element within the draft HHTRP. We believe it lacks clarity and does not set out definitive actions to stabilise and restore hen harrier populations. In relation to wind energy, the draft HHTRP has no recommendations for consultants or developers aimed at resolving any of the potential issues identified, or guidance on what the NPWS feels is needed from the industry.

WEI believes that the evidence base has not been provided to support claims that wind energy is one of the primary causes of the declining numbers and there is a concern that these claims would be used by those opposed to the development of renewable energy or actions to address the climate emergency.

WEI is confident that renewable energy has been and can continue to be developed in coexistence with the conservation of our national hen harrier population, and that the wind industry can play a key role in supporting and delivering meaningful action for its management across the island of Ireland. Hen harriers already can and do breed successfully on operational wind farms under their management regimes – see our case studies below for an example where a nest in close proximity to a turbine successfully fledged chicks five out of the last six breeding seasons (2018-2023).

The results of the 2022 National Survey of Breeding Hen Harrier in Ireland<sup>1</sup> demonstrate that Ireland needs to take decisive steps to reverse the continued decline of hen harrier populations at both local and national scales. WEI has identified opportunities for improved and additional hen harrier conservation measures in wind farm development outlined in our recommendations below and which we urge NPWS to consider for the HHTRP and for the ongoing management of hen harriers in Ireland.

The interventions of the renewable sector alone will not be enough to accelerate the protection of the hen harrier. All countryside sectors must be supported and incentivised to promote hen harrier habitats and rehabilitation to ensure a comprehensive approach is being taken. Government should consider the creation of a cross-sectoral working group and oversee progress chaired by an accountable Minister and Department.

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<sup>1</sup> <https://www.npws.ie/sites/default/files/publications/pdf/IWM147.pdf>

## Lack of evidence to justify the identification of wind energy as a significant threat to the hen harrier

The draft HHTRP identifies wind energy development as one of the three most significant threats to hen harriers, along with forestry and agriculture but fails to provide robust evidence to support this assertion. There is an absence of statistically significant Irish scientific evidence to support this conclusion.

The summary in 5.3 of the draft HHTRP stating that “there is now some evidence that hen harrier breeding productivity may be impacted by wind turbine development close to nesting areas” is not based on sufficiently robust evidence. The evidence presented to support the inclusion of wind energy as a significant threat is very reliant on the WINDHARRIER study (Wilson *et al.*, 2015)<sup>2</sup>, (Fernández-Bellon *et al.*, 2015)<sup>3</sup> particularly with respect to effects on breeding success on hen harrier within 1 km of turbines.

The WINDHARRIER authors are themselves very clear on the limited dataset used, the non-statistically significant nature of the results and its inability to definitively conclude that the observed reduction in breeding success is due to the presence of wind turbines within 1 km of the nest rather than the multiple other factors in the landscape that might be at fault e.g. forestry, agriculture etc.

We acknowledge that WINDHARRIER is currently the only study in an Irish context to assess the interactions between breeding hen harrier and wind turbines but given the small sample size, the assertion by the authors themselves that the results are non-statistically significant results

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<sup>2</sup> Wilson, M, Fernández-Bellon, D., Irwin, S. and O’Halloran, J. (2015). The interactions between Hen Harriers and wind turbines. WINDHARRIER. Final project report, prepared by School of Biological, Earth and Environmental Sciences, University College Cork, Ireland. PP95.

<sup>3</sup> Fernández-Bellon, D., Irwin, S., Wilson, M. and O’Halloran, J. (2015). Reproductive output of Hen Harriers *Circus cyaneus* in relation to wind turbine proximity. *Irish Birds*. 10: 143-150

and the need to accelerate the development of renewable energy to decarbonise our energy systems we strongly urge caution around the interpretation and translation of these results into conservation and industry guidance.

Instead, we would encourage that the use of best-available scientific evidence and emerging research from Ireland and other jurisdictions are also used to inform conservation and industry guidance. WEI would welcome further research to be undertaken to further understanding of hen harrier ecology and the interactions of the species with wind farms at all phases of the development such as the SEAI-funded [RE:HARRIER](#)<sup>4</sup> research project which is currently underway. Wind energy developers already hold a significant repository of data that they are willing to re-share with NPWS and / or their expert designates. Individual wind farm developers have made frequent efforts to engage with the NPWS about how best to share that data and we would repeat this offer now.

It is important to be aware that the boundary of a wind farm is often misunderstood. The operational footprint of most wind farms is modest compared to other land uses and it is confined to the infrastructure, comprising hardstands, tracks, and substation.

Wind farm operators have limited or no control over the surrounding land uses. Many typically operate under a lease agreement where the operator only has control over the footprint around the wind farm turbines and access roads, and the influence of the wind farm on habitats within a 1000m radius of the site is therefore limited only to these leased lands. Unless the long-term management of all lands within 1000m of the turbine is within the control of the wind farm operator, the effect of changes in land use due to agricultural, forestry or other activities cannot, and should not, be attributed to wind energy development.

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<sup>4</sup> <https://mkoireland.ie/expertise/research/>

In order to make informed decisions and respond effectively, it is critical that these habitat effects are attributed to the correct land-use pressures. WEI is concerned that this has been a factor in some of the conclusions drawn in the recently published 2022 National Survey of Breeding Hen Harriers in Ireland Report, which at times appear to be based on subjective opinions of surveyors and lack supporting scientific evidence. The admitted failure to carry out nest monitoring in the 2022 survey also undermines the robustness of the outcomes presented.

Negative impacts caused by the surrounding land use or activities such as turbarry, vegetation burning etc. can often be mistakenly attributed to the presence of the wind farm in these cases and are not within the control of the wind farm operator.

Some studies have found only limited evidence of displacement of breeding hen harrier directly attributable to operational wind farms. Haworth and Fielding (2012)<sup>5</sup> conclude that hen harriers experience some small-scale displacement but generally there are no significant large-scale impacts caused by wind farms. Disturbance from construction activities during the nesting season are more significant and should be mitigated for to avoid impacts. Early preparation of suitable hen harrier habitat at the pre-construction phase can mitigate and compensate for possible displacement in advance by ensuring nearby habitat is available and suitable for hen harriers when construction commences.

The site selection process is designed to avoid the placement of turbines near known hen harrier nesting sites. As constraints such as nest locations and sensitive habitats emerge, these are avoided in the EIA process. When wind farms are designed correctly, they are positioned in locations where they minimise, or avoid altogether, negative effects on biodiversity. This may be reflected in apparently low density / diversity of species recorded in studies of operational wind farms.

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<sup>5</sup> Haworth, P., Fielding, A. (2012) A Review of the Impacts of Terrestrial Wind Farms on Breeding and Wintering Hen Harriers (Haworth Conservation Report). Oban UK.

Collision is recognised as a risk factor for the species but is a relatively rare occurrence as supported by the draft HHTRP which notes collision is not a high threat to the species. Notwithstanding that, collisions have occurred on sites and were reported to the regulator. Examples of mitigation measures such as curtailment of certain turbines and supplementary feeding carried out under license have successfully been implemented to protect and support nesting females. Developers can seek planning for turbines with blade tips above foraging heights to minimise collision risk. Additionally, developers site turbines to avoid typical flight paths from known hen harrier roosting sites to foraging areas nearby and can also create new foraging habitats to change typical flightlines from known roosting locations.

## Importance of wind energy development in reaching climate targets and reducing the effects of climate change on the hen harrier

We are living, as the Oireachtas has itself declared, in a global climate emergency. To respond, we need to cut our carbon emissions as quickly as possible and, in Ireland, in line with the carbon emissions targets set out in the Climate Action and Low Carbon Development (Amendment) Act 2021<sup>6</sup>. The Climate Action Plan 2024<sup>7</sup> opens by stating: *“The world’s climate is changing rapidly with temperatures increasing faster since 1970 than in any other 50-year period over at least the last 2,000 years... Continued emissions of GHGs will cause further warming and changes to our climate leading to increased risks to people and nature.”*

The draft HHTRP fails to consider how it can meaningfully address threats to the species while also meeting the requirements of Government policy on climate change and renewables. The threat and impacts on the hen harrier and its prey species from climate change and the role of

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<sup>6</sup> <https://www.irishstatutebook.ie/eli/2021/act/32/enacted/>

<sup>7</sup> [gov - Climate Action Plan 2024 \(www.gov.ie\)](https://www.gov.ie/en/publications-and-statements/2024-03-14-climate-action-plan-2024/)

wind energy development in mitigating climate change and the associated impacts is not taken sufficiently into account. Climate change is already impacting bird populations (Pearce-Higgins, 2021)<sup>8</sup> and it is continuing to accelerate and intensify each year. 2023 was the warmest year on record for Ireland and notably saw the warmest June and the wettest March and July on record<sup>9</sup>.

Ireland has committed to reach net-zero carbon emissions by 2050 and to do so we must more than double onshore wind capacity through both the development of new wind farms and repowering of existing sites. The present policy context is shaped by the Climate Action Plan 2021 which set out the indicative renewable electricity capacity required to meet the policy of achieving an up to 80% renewable share in electricity by 2030, and the more recent Climate Action Plan 2024 has increased the target for onshore wind capacity to 9 GW by 2030.

Doubling onshore capacity does not equate to doubling the number of turbines. The ever-improving technology means newer turbines are larger and considerably more powerful than most of the existing older turbines in Ireland. An important aspect of reaching our climate targets and reducing our carbon emissions will be facilitating the repowering of many of these existing wind farms with larger, more advanced turbines.

According to WindEurope, on average, repowered wind farms in Europe bring 25% fewer wind turbines, 4 x power output per turbine, and 3 x power output per wind farm<sup>10</sup>. Ensuring that there is a clear policy pathway to enable repowering of wind farms with respect to hen harrier conservation will be critical. Open and cooperative engagement with NPWS, wind developers and other stakeholders such as environmental NGOs to consider the most beneficial measures on a site-by-site basis will be vital to achieve this.

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<sup>8</sup> Pearce-Higgins, J.W. 2021. [Climate Change and the UK's Birds](#). British Trust for Ornithology

<sup>9</sup> <https://www.met.ie/annual-climate-statement-for-2023>

<sup>10</sup> [Repowering Europe's wind farms is a win-win-win | WindEurope](#)

The NPWS 2022 report entitled *Hen Harrier Conservation and the Wind Energy Sector in Ireland*<sup>11</sup> notes that repowering of old wind turbines with larger models can move the rotor swept area above their typical foraging altitude. Between 1992 and 2014, the average height of the lower edge of the rotor swept area doubled. Thaxter *et al.*'s (2017)<sup>12</sup> review study identified a strong positive correlation between turbine capacity (MW) and bird collisions per turbine, indicating that fewer, larger turbines should be installed to minimise collisions. This should be explicitly outlined in the HHTRP.

We would highlight the legal obligation on the NPWS, in developing the HHTRP as one of its functions, to have regard to “the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State” as set out in section 15 of the Climate Action and Low Carbon Development Act 2015<sup>13</sup>.

The HHTRP must recognise the threat of climate change and the ability of hen harriers to co-exist with both extant and prospective wind energy development sites. Furthermore, the HHTRP should recognise the opportunity wind energy development can afford hen harriers through monitoring, rehabilitation of habitats and provision of new additional habitats.

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<sup>11</sup> NPWS (2021). *Hen Harrier Conservation and the Wind Energy Sector in Ireland*. Unpublished report

<sup>12</sup> Thaxter CB et al. (2017) Bird and bat species' global vulnerability to collision mortality at wind farms revealed through a trait-based assessment. *Proc. R. Soc. B* 284: 20170829. <http://dx.doi.org/10.1098/rspb.2017.0829>

<sup>13</sup> [Climate Action and Low Carbon Development Act 2015 \(irishstatutebook.ie\)](http://www.irishstatutebook.ie/eli/2015/act/12/enacted/en/html)



## The Irish planning system, hen harrier and wind energy development

WEI wish to emphasise that wind energy development in Ireland goes through a rigorous, consultative, and timely planning and assessment process in order to obtain planning permission. For example, the timelines associated with EIARs for wind energy developments are approximately three years. This is mainly due to the adoption by wind energy developers of the two-year pre planning application bird monitoring requirement as set out in NatureScot (formerly Scottish Natural Heritage) guidance<sup>14</sup>.

The planning process that wind energy developments go through is not comparable to the planning processes that, for example, forestry or agriculture are subject to. In fact, forestry and agriculture are largely exempt from planning requirements under the Planning and Development Act. As set out in the EIA Directive, wind energy developments of more than five turbines, or with a total output greater than 5 MW require an Environmental Impact Assessment. Environmental Impact Assessment (EIA) is the process of examining the anticipated significant environmental effects of a proposed project - from consideration of potential environmental effects at design stage, through consultation and preparation of an Environmental Impact Assessment Report (EIAR), evaluation of the EIAR by a competent authority and the subsequent decision as to whether the project should be permitted to proceed.

Hen harrier habitat often overlaps with areas suitable for wind development and developers first seek to avoid such areas where possible when siting wind farms and infrastructure, and to take further steps to mitigate any potential negative effects, particularly in relation to availability of suitable nesting habitat and foraging distances.

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<sup>14</sup> <https://www.nature.scot/doc/recommended-bird-survey-methods-inform-impact-assessment-onshore-windfarms>

Within the HHTRP there appears to be limited acknowledgement of the requirements of EIA with respect to the requirement for extensive baseline survey, identification and characterisation of impacts, provision of meaningful mitigation measures, determination of the significance of any residual effects and provision of compensation and enhancement for hen harrier. A better representation of what this entails should be included within the plan to demonstrate current mitigation and compensation measures applied with respect to hen harrier.

Wind Energy Ireland has repeatedly called for additional resources for the NPWS and for decision-making bodies such as An Bord Pleanála to fund the hiring of individuals trained and with experience of carrying out EIAs. We believe this would greatly enhance the EIA decision-making. The availability of such staff would also assist at scoping stage of the EIA process if definitive advice on survey requirements and addressing effects on hen harrier were then provided.

Wind energy developments are also subject to the requirements of Article 6(3) and, where required / appropriate, Article 6(4) of the Habitats Directive (Council Directive 92/43/EEC)<sup>15</sup>. Once planning permission is received, which is typically years after an application to a planning authority has been made, strict conditions are imposed on the wind energy development including such relevant conditions as avoiding certain works during bird breeding species, annual bird monitoring requirements and in some cases lands to be set aside for habitat enhancement.

Appropriate and targeted habitat management is the most crucial element for successful hen harrier conservation and this topic needs far more attention and expansion in the HHTRP in order to develop a meaningful plan which will deliver for hen harrier conservation.

WEI recommends more detailed consideration be given to the role of Habitat Management Plans in mitigating and offsetting potential negative impacts on hen harrier populations and going further in optimising land management with restoration and growth of hen harrier populations

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<sup>15</sup> Consolidated text: Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01992L0043-20130701>

as a key focus. The impact of egg and chick predation as a key factor in the decline of the ground nesting hen harrier should not be underestimated in such a small and fragmented national population. Site-appropriate and strategic seasonal measures should be considered on breeding sites.

Given the strict process that wind energy developers adhere to prior to and during development of wind energy developments WEI is of the opinion that any perceived threat to hen harriers will be determined pre-planning consent and as stated earlier in this submission, that wind energy development can in fact offer opportunities rather than threats to hen harrier populations in Ireland.

## Successful co-existence of hen harriers and wind energy: A selection of case studies provided by WEI members

### 1. ESB Onshore Wind Farm Hen Harrier Case Study

“The ESB owns and operates a 17-turbine wind farm situated primarily in plantation forestry with areas of upland blanket bog, heath and agricultural grassland also within the site boundary. The wind farm site, as well as the surrounding areas where several traditional territories are known, have been monitored for hen harrier breeding activity since pre-construction.

During the first year of the wind farm operation a previously unrecorded territory was identified within 350m of an operational turbine. The harriers have returned to this territory every year since the wind farm commenced operation (no data for 2021) and have nested as close as 240m from the operational turbine. ESB has curtailed (switched off) the turbine at this location each

year for the duration that the nest is occupied. The nest site has been monitored for the last 6 years (excluding in 2021) but only successfully fledged a chick in 2022. Monitoring of the nest in 2019 showed that the breeding attempt was recorded as failing late, with chicks considered likely to have been within a few weeks of fledging. Predation was suggested as the most likely cause, but it is noted that predation was not confirmed in this case. The exact reasons for the lack of success in the other years are unknown, but as with hen harrier nest failures elsewhere in Ireland, are thought to include predation and adverse weather (latter may result in low provisioning rates leading to starvation of chicks).

Data collected during the vantage point surveys show that breeding hen harriers, probably from two or more territories, make extensive use of the wind farm area for foraging.

ESB is working with our ornithology specialists to complete an extensive habitat management plan for hen harrier within the wind farm site. The aim of the plan is to improve the foraging habitat available for hen harrier within the wind farm site.”

## 2. Ørsted Onshore Wind Farm Hen Harrier Case Study

“Ørsted employed ecological consultants to design and implement the comprehensive Hen Harrier Management Plan to satisfy planning conditions at the Knocknatallig Windfarm. The Management Plan has dedicated survey work agreed with the local authority for the lifetime of the windfarm. The Management Plan consisted of recognised habitat management prescriptions with proven efficacy in providing viable foraging habitats for hen harriers which were employed in conjunction with an area wide predator control programme. The habitat management prescriptions employed (Total area under management 91 hectares) were as follows:

- Pre maturity felling;
- Favourable Thinning;
- Low intensity 'In Check' forest management.

The consultants designed these management areas close to hen harrier nests/known foraging areas and ensured that Hooded Crows within 2km of the managed areas were controlled at the beginning of each season using ladder traps.

The results of this management regime have been very successful with Hen Harriers fledging in 5 out of the last 6 monitored breeding seasons at this operational wind farm site (2018 – 2023). In addition, the successful nest was in close proximity to an operational turbine each year (Depending on the year between ca 400m and 575m).

Why was this nest so successful? Designing and delivering managed foraging habitats for Hen Harrier in close proximity to a nest allowed the female to hunt successfully close to her nest while watching the nest at the same time, avoiding predation of the nest by corvids. In addition, the predator control programme ensured that corvid numbers were reduced significantly each year before breeding took place. Combined, these 2 measures provided some of the important support needed by the hen harriers to be successful at this site each year.”

### 3. Greencoat Renewables Onshore Wind Farm Hen Harrier Case Study

“Knockacummer Wind Farm (29 turbines) and Glentane Wind Farm (11 turbines) in County Cork are owned and operated by Greencoat Renewables and located within the Stacks to Mullaghareirks, West Limerick Hills and Mount Eagle Special Protection Area (SPA), designated

for hen harrier. In compliance with the conditions of planning consent, the wind farms are operated in accordance with a comprehensive Species and Habitat Management Plan (SHMP) which is now in its tenth year of implementation.

A novel feature of the SHMP is that over 200 hectares of land in the wider vicinity of the wind farms; comprising commercial rotation forestry, blanket bog, upland heath and agricultural lands; are being actively managed for hen harrier habitat through bilateral agreements with Coillte and local farmers, and via direct purchase. These habitat management plots are subject to a range of specific measures including requirements for clear-felled forestry to be left fallow for longer periods with phased replanting, 'no-plant' obligations for forestry on certain lands and paying local farmers to undertake habitat sensitive agricultural practices, such as managing rush growth, nutrient application and grazing.

Notably, Greencoat Renewables directly purchased 50 hectares of commercially forested lands to the north of the wind farms and subsequently negotiated a Forestry License for its phased felling, with each phase being left fallow for a minimum of two-years before replanting. It has been further agreed that the lands will be replanted with slow growing tree species at a lower density than that associated with typical commercial production. Moreover, part of the lands will not be replanted at all but instead maintained to ensure they provide optimum habitat for foraging hen harrier. To compensate for this loss of forestry, 17 hectares of replacement afforestation lands were purchased outside of the SPA. This measure, which is being provided above and beyond the strict requirements of planning consent, represents a very significant investment in hen harrier conservation.

In addition to these direct management measures to maintain and improve hen harrier habitat outside of the wind farms, the SHMP also includes continuous multiannual surveys to monitor the level of hen harrier interaction with operational turbines and the habitat management plots, including:

- Eleven vantage point watches covering all operational wind turbines and capturing 792 hours of survey data annually;
- Seven vantage point watches covering the habitat management plots during the breeding season and capturing 252 hours of survey data annually;
- Breeding season hen harrier watches covering a distance up to 5km from turbines to locate and monitor breeding activity; and,
- Hen harrier roost searches covering a 2km turbine buffer to locate any winter roosting activity.

Furthermore, nine rounds of fatality searches are conducted over each breeding season at each of the 40 turbines to monitor for bird strikes, using specially trained wildlife detection dogs and handlers. Throughout the habitat management plots, suitability assessments are also continuously conducted, such as prey density surveys, small mammal monitoring and countryside bird surveys within different types and age classes of clear-felled forestry.

In a dynamic ecological environment, the SHMP has been intentionally designed to be an iterative 'living document' continually updated and amended in response to changing circumstances, and subject to periodic reporting to both Cork County Council and the National Parks and Wildlife Service.

For example, in recognition of the importance of providing information on the efficacy of habitat management measures and to quantify any ongoing risk posed to the regional hen harrier population, it was decided to significantly expand the monitoring programs beyond the compliance years specified in the planning consents and also to cover the non-breeding season. As a result, five years of uninterrupted surveys have now been collected.

Additionally, in recognition of the landscape scale over which hen harrier populations exist, the SHMP incorporates a landscape model which aims to compile a cumulative analysis of wind farm and forestry land uses within the SPA. Model coverage was subsequently increased from the

original 5km distance from the turbines to cover the entire SPA. The modelling outputs monitor the felling schedules for forestry plantations to predict how much potential hen harrier habitat will become available over a given time period and equally how much habitat will become unavailable as the canopies eventually close.

Recent monitoring results from the SHMP have highlighted limited breeding and foraging suitability and use in some areas in the northern vicinity of the wind farms, which has culminated in further agreement with Coillte in relation to early felling of forestry in specific locations to help facilitate a return to suitable hen harrier habitat.

It is hoped that the SHMP, which demonstrates a very significant long-term financial commitment by Greencoat Renewables, can continue to provide a valuable knowledge base in understanding how hen harrier populations interact with wind turbines and a best-practice exemplar in how the presence of wind energy investment can positively contribute to protecting and managing habitat and the enduring conservation of this critically important species.”



*Fig. 1 Managed rush habitat for hen harrier in the vicinity of Knockacummer Wind Farm*





*Fig 2: 'No-Plant' obligation lands which have been taken out of forestry to provide suitable habitat for hen harrier*



*Fig 3: "Storm" performing a carcass search in the scrub at base of a turbine @Ciaran Cronin/Wildeye*

#### 4. FuturEnergy Ireland – Land Management Scheme for Hen Harrier Case Study

FuturEnergy Ireland has developed a land management scheme for foraging hen harrier that adopts the measures applied in the hen harrier EIP project<sup>16</sup>. The aim of the scheme is to compensate, through land management measures, for the potential displacement of foraging hen harrier during the operational phase of onshore wind farms. The scheme will be applied across the FuturEnergy Ireland portfolio of development sites and will focus on working with landowners to improve foraging habitat within 2 km of known nest sites.

The scheme requires obtaining option for lease agreements on landholdings for a term of 35 – 40 years, with measures being implemented a minimum of 3 years before construction of the wind farm commences. The lease agreement places a legal obligation on the landowner to comply with FuturEnergy Ireland's requirements with respect to management of lands for hen harrier. The commercial terms of the option to lease agreement include a list of standard land (habitat) management measures that will be used when preparing the landholding specific Farm Plan. The landowners will receive annual payment, agreed as part of the lease, for the 35-40 years. To date we have applied this approach at two wind farms and successfully signed 140 ha of agricultural land.

Other features of the land management scheme are as follows:

- Farm plans will be prepared for each landholding in consultation with the landowner and is referred to in the Lease Agreement.
- FuturEnergy Ireland will appoint an independent group / body to oversee the preparation of the farm plans. The appointed group / body will provide each landowner with an agricultural consultant and ecologist to develop a farm plan for each landholding.

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<sup>16</sup> <http://www.henharrierproject.ie/>

- The farm plan will include a timeline for auditing of the farm, with the findings of the audits used to demonstrate compliance with the commitments made in the planning application for the proposed wind farm.
- Auditing of the landholdings will evaluate the achievement of the Farm Plan objectives against the agreed timeline / milestones / commercial features of this novel and impactful land-use scheme.

## 5. SSE Renewables - examples of landscape-scale restoration in wind energy

“Reversing the decline of hen harrier, and other biodiversity loss, requires appropriate long-term, landscape-scale management. It is widely acknowledged that habitat loss is the key driver affecting hen harrier populations in Ireland and this requires a new approach to land use and habitat restoration. Renewable energy has been shown to contribute to nature conservation when delivered collaboratively with regulators, conservation bodies, and local landowners through Habitat Management Plans (HMPs) and Biodiversity Net Gain strategies. This approach can deliver targeted conservation for specific habitats and species along with wider benefits for biodiversity. SSE Renewables (SSER) has a long history of implementing landscape-scale HMPs and peatland restoration on consented wind farms in Scotland as evidenced by the following examples. While these examples are from SSERs Scottish Wind Farms, the habitat management plans could easily be replicated across Ireland.

Strathy North Wind Farm, with over 1,000 hectares of land under active habitat management, is an example of a programme of restoration work that extends over the lifetime of a wind farm project. Extensive areas of conifer plantation are being felled and restored to peatland habitat benefiting raptor species, including the hen harrier, along with wider biodiversity benefits. The

Strathy North Wind Farm HMP is located adjacent to the Caithness and Sutherland Peatlands SPA and SAC, where it supports the overarching aims of the Natura 2000 sites and helps to increase habitat connectivity within the wider landscape. As part of the HMP process, SSER has forged strong research links with the Environmental Research Institute at Thurso (part of the North Highland College, UHI) on peatland restoration.

Clyde Wind Farm implements a HMP covering 2,000 hectares of land with emphasis on felling large areas of commercial plantations for the purpose of restoring blanket bog and heath and the creation of native woodlands. It undertakes active deer management and predator control in selected areas. Hen harrier were absent from this area for a number of years but have recently been recorded nearby and SSER have resumed vantage point surveys for this species to monitor activity within the wind farm area.

The achievements at Clyde Wind Farm have received external recognition as an exemplar site and the Scottish Government's Onshore Wind Policy Statement 2022 notes that: *Scotland's onshore wind sector can bring many and considerable benefits to rural areas, ranging for the delivery of jobs and investment to the restoration and protection of natural habitats. The Scottish Government wants to see the onshore wind sector continuing to contribute to peatland restoration as part of development and expects the sector to step up to the challenge of biodiversity loss by showcasing considered schemes that will not just mitigate impact but also improve and enhance our natural environment. To take just one example, Clyde Wind Farm is an established wind farm within the landscape and has the benefit of seeing the initial results for these peatland restoration and biodiversity improvement programme.*

Griffin Wind Farm has shown remarkably stable populations of hen harrier with regularly successful nesting occurring within 350m of a turbine. This site demonstrates a common issue

for hen harrier experience across its Irish and Scottish ranges. Ongoing monitoring identified predation of nests as primary reason for nest failures at Griffin Wind Farm. The Scottish National Hen Harrier Survey report also notes predation, and primarily fox predation, as a concern. This is consistent with the HHTRP and many other Irish studies are increasingly recognising the role of predation.

Several other examples of wind energy projects that successfully support the conservation of bird species and habitat restoration exist. These include: Fairburn Wind Farm habitat management for hen harrier, merlin and golden eagle; Stronelairg Wind Farm provides deer carrion for the management of eagles with landowner payment for supplementary feeding; Bhlaraídh Wind Farm supports the use of satellite telemetry for target species to monitor interactions and Strathy South Wind Farm, which is currently in development, is SSER's most ambitious HMP to date with an area of 1,600 hectares under peatland restoration.

Much of this conservation work is achieved through collaborative efforts. For example, the Regional Eagle Conservation Management Plan (RECOMP) is a golden eagle research, conservation and monitoring project that covers the Central Highlands Natural Heritage Zone, centred in the Monadhliath Mountains. It is chiefly funded by SSER through its Dunmaglass Wind Farm development. Activities are promoted and taken under advice by an Advisory Board consisting of representatives from a number of organisations including The Highland Council, NatureScot, RSPB and the Highland Raptor Study Group. This model has proven highly successful for the restoration of the species with a high number of territories now occupied.

Examples of this approach can be seen in recent wind farm developments in Ireland, such as Galway Wind Park (GWP), which is delivering substantial Habitat Management Plans (HMP) through collaboration with research bodies and engagement with landowners. As part of the EU

Life Multipeat project, GWP will fell areas of conifer and undertake drain blocking to enable the restoration of peatland habitat in two areas, comprising 174 ha and 59 ha each. These sites were chosen as they link with adjacent designated areas (Connemara Bog Complex Special Area of Conservation (SAC), Oughterard District Bog Natural Heritage Area (NHA) and Moycullen Bogs NHA). In addition, the wind farm HMP borders areas that are important for overwintering Greenland White Fronted Geese. Successful mitigation was implemented during the construction phase to avoid disturbance. This further work during operational phase will help to increase the overall area of peatland and buffer the existing designated areas, which also providing suitable habitat for Greenland White Fronted Geese. Overall, the development presented an opportunity for substantial restoration of valuable blanket bog through the removal of coniferous plantation. Similar projects could be implemented for repowering wind farms located in SPAs designated for hen harrier.

Long-term management strategies require land availability and landowner engagement. Delivering positive land use change is complex and is not without challenges. However, the projects highlighted above demonstrate that the wind industry can, and does, play a central role in delivering long-term benefits for biodiversity, climate and communities. These examples also demonstrate the expertise within the industry to effectively negotiate complicated land management arrangements and undertake difficult ecosystem restoration at scale.

Land is central to the delivery of any HMPs and Biodiversity Net Gain strategies. Many older wind farms in Ireland have limited, or no land available for management and consist solely of the wind farm infrastructure comprising hardstands, tracks and substations. Land uses adjacent to the infrastructure, such as agriculture, forestry and turbarry are entirely outside the control of the wind farm operator. The land use in many SPAs is particularly complex and is further complicated by landowner issues, grazing rights associated with commonage and turbarry rights. Land within



SPAs is often considered marginal from an agricultural point of view but is highly valuable for conservation. Wind energy development HMPs can provide additional income to support low-intensity farming compatible with nature conservation objectives.

Repowering and Extension of Life offers an opportunity for a revised model of wind energy development in Ireland, in line with the conservation and restoration approach used elsewhere. As wind farms re-enter the planning and development system, there is an opportunity to review existing lease arrangements and incorporate substantial areas of land for habitat management. The advantage wind energy has over other industries, projects and schemes is that wind energy projects span decades and developers actively engage landowners through private lease agreements, spanning 25 years or more. Short to medium-term schemes can be time-limited by funding or other factors so delivering land use change through an industry that is embedded in the community can ensure a sustainable, long-term gain.”

WEI recommendations to support and maximise onshore wind energy development's contribution towards hen harrier conservation:

## **1. Introduction of an Agri-environment scheme to support appropriate land management in land adjacent to wind farms:**

Agri-environment schemes to improve habitat availability for hen harrier are well established in Ireland with at least 6 different such schemes referenced in the threat response plan. The principles of land management to improve and create habitat for foraging hen harrier are thus well established and have been demonstrated to work through the application of Agri-environment schemes.

The land management measures require relatively simple changes to agricultural practices that while benefitting hen harrier also have wider biodiversity benefits. Many of the changes can be made immediately with limited cost and will provide suitable habitat for foraging within a relatively short period of time. This can be applied at a landscape scale and provide improved foraging resources within 2 km of known nests.

Onshore wind energy developments can apply the principles of the Agri-environment schemes to compensate for the potential loss of foraging habitat caused by displacement during the operational phase of onshore wind farms. Landholdings surrounding the wind farm can be used for a landscape scale biodiversity / habitat enhancement scheme through legal agreements and financial compensation for the landowner. These agreements would guarantee somewhere between 35 and 40 years of land management to benefit hen harrier and biodiversity more generally.



## 2. Reduction of afforestation through replanting exemptions for wind industry:

Currently, in most sites where trees must be felled during construction of a wind farm, developers are obliged by the Forest Service to replant like-for-like, generally resulting in widespread replanting of Sitka spruce. This is a huge lost opportunity for implementing beneficial habitat measures for native Irish wildlife. Through improvement of the felling license and afforestation regulations, being given flexibility to instead replant with small, widely spaced, and slow growing deciduous trees e.g. rowan, would improve habitat and food availability for many species throughout the year.

On afforested sites if the replant requirement was removed for the purposes of development of wind energy to allow habitat restoration, particularly where peat soils are present, it would allow developers to open larger areas within the forestry. This would allow developers and their consultants to manage and restore habitats that offer contiguous habitat and improved prey resources for breeding and foraging hen harrier.

The reduction in afforestation can only be achieved if the Forest Service amends its approach to replant lands and sets out exemptions to replant requirement for habitat management and habitat restoration purposes specifically for wind energy development. Currently, the exemption for this type of work is very limited and how the exemption can be gained is not clearly set out.

The importance of this recommendation is highlighted in the NPWS 2022 document entitled *Hen Harrier Conservation and the Wind Energy Sector in Ireland* where it references O'Flynn (1983)<sup>17</sup>'s finding that by the mid-1970s, earlier-planted conifer forests had grown to maturity, resulting in

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<sup>17</sup> O'Flynn, W. J. (1983). Population changes of the Hen Harrier in Ireland. *Irish Birds* 2: 337-343

a direct negative impact on the availability of suitable prey. Coincident changes to open, non-forested habitats in hen harrier breeding areas were also occurring at this time. The combination of the maturation of forest estate and the clearance of marginal land was considered by O'Flynn (1983) to be the main reason for the hen harrier breeding population decline of the late 1970s.

Our recommended Agri-environment scheme and replant exemptions discussed above would complement each other well and acting in combination they would be an even more powerful habitat management tool. We also want to highlight that while these recommendations are set out with providing landscape scale benefits for the hen harrier in mind, these actions would also deliver significant benefits to an array of species and could be adapted on a site-by-site and species-specific basis.

### **3. Improvement of survey standards and improved application of existing guidance:**

The quality of surveys, particularly baseline surveys, is very important and all efforts should be taken to ensure a robust survey programme is in place. When nest sites and roost sites are identified at the outset they can then be protected and avoided during the wind farm design process. In Ireland, winter roosts tend to be lowland sites below 100m asl and so the overlap with wind farms is likely to be minimal. Baseline surveys will also identify areas of foraging importance and a Habitat Management Plan can mitigate or compensate for any areas affected by development. Operational monitoring may reveal reasons for nest failure which, in turn, could result in implementation of management changes (i.e. habitat management or predator control).

The bird survey methods for wind farms are standardised with NatureScot being accepted in jurisdictions globally for application at onshore wind farm developments. The international lenders have requested its use on wind farms in South Africa, Georgia and Lebanon for example.

While the methods and guidance are standard there may be issues with how the methods are implemented in practice. It would improve the quality of data gathered if there was some minimum level or standard that could be set and enforced with respect to the competency of surveyors but also with respect to the competency of the ecologist defining the survey scope. We suggest a certification process could be developed to achieve an improvement in the quality of data collected e.g. through [Green Tech Skillnet](#)<sup>18</sup> in partnership with the Irish Raptor Study Group, Birdwatch Ireland or another suitably qualified organisation.

Green Tech Skillnet (GTS), in collaboration with members of Wind Energy Ireland, is currently working on development of micro-credentials for the environmental sector to improve e.g. fieldwork and report writing skills. GTS is keen to collaborate with more stakeholders to identify skills which would benefit from being strengthened by such courses and can work to develop the courses with the relevant experts and academic institutes. Engagement between NPWS and GTS on this workstream could be mutually beneficial.

Given the continuing decline of hen harrier populations, more frequent national-scale surveys are needed to respond as effectively as possible to changes in the populations at a local level and maximise the efficacy of adaptive management. As a result of significant monitoring effort, the wind energy sector has produced a large body of operational survey data, but it is underutilised and requires a centralised, independent body to undertake analysis of the data in conjunction with analysis of land use changes. The operational data suggest that the key drivers are land use changes and habitat loss, a lack of appropriate habitat management, disturbance, burning, turbary, predation, persecution and more recently, climate change as extreme weather events have resulted in chicks perishing in the nest. Facilitating the storing and sharing of such data in a central repository held by NPWS as mentioned in Action 49 of the draft HHTRP would be

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<sup>18</sup> [Green Tech Skillnet \(mykademy.com\)](https://www.mykademy.com)

beneficial. WEI also welcomes Action 29 which aims to address “*knowledge deficit in regard to land use and how this affects survival of hen harriers outside the breeding season.*” Any meaningful measures related to this will require this data and thus this action should be a priority.

#### **4. Closer engagement and collaboration between NPWS and the wind industry:**

Developers would benefit from meaningful engagement through the design and assessment stages of projects. While it is possible to consult with the NPWS via the Development Application Unit, site-specific advice regarding existing hen harrier records, proposed survey scope and proposed assessment approach would be welcomed. It would be greatly beneficial if consultation meetings could also be consistently facilitated during the design and assessment phases.

WEI strongly urges closer collaboration between NPWS and the wind industry at both a project level and at the wider industry level through WEI. As discussed further below, WEI welcomes Action 54 of the draft HHTRP to “*Undertake pre-application meetings at an early stage of the pre-planning process, where requested or where the scale of the development mandates same*” and urge that appropriate funding and resourcing be allocated to NPWS as a top priority to ensure NPWS has the capacity to engage at a meaningful level. Resources should be focused on improving the outcome for hen harrier through provision of proportionate, meaningful advice at scoping stage and clear expectations to developers and their consultants. This would allow focus on meaningful compensation through land management measures for displacement of foraging birds.

The wind industry is heavily regulated and undertakes extensive bird monitoring before even applying for planning permission, and on operational sites. The results are submitted to planning

authorities as part of the consent process but often receive limited or no feedback to the developer. It is vital for hen harrier conservation that regulatory and statutory bodies proactively engage with developers as early as possible during the planning process and during the subsequent operational stages. Early and meaningful engagement will be key to ensuring the proper design and long-term management of wind farms for hen harrier. An effective approach to support hen harrier on wind farms may be to conduct less site monitoring but implement more habitat restoration to focus on the provision of suitable foraging and breeding habitat for hen harrier. The use of buffers around nests should be nuanced and follow recognised good practice adopting a project and site-specific approach including consideration of topography, habitat type and tolerances / behaviours observed with respect to responses by individual pairs.

## **5. Repowering policy designed to complement hen harrier conservation measures:**

When a wind farm site is being repowered, land which is being made available after turbine removal can be used to provide additional hen harrier habitat. The new site layout can be planned with hen harrier and hen harrier prey species habitat requirements in mind. Developers can secure felling licenses to create alternative hen harrier compensatory foraging areas away from the windfarm sites, which if felled/replanted are a regular basis, can create a permanent foraging areas near known roosting or nest locations. This action will increase the likelihood of successful breeding activity at these locations. Where prey availability is considered as an issue, supplementary feeding could be trialled at a wind farm site along with measures to improve habitat. Hen harriers prefer live prey, but supplementary feeding initiatives have been used at other wind energy sites and delivered positive results in the form of positive brood sizes.

Decommissioning of existing wind energy development in or adjacent to SPAs will not address the habitat loss and degradation at the root of the species decline. It will simply miss an opportunity to implement a more integrated approach to land use and habitat management in these areas. The conservation of hen harrier requires the reversal of large-scale afforestation within SPAs and appropriate agri-environmental management for heather, blanket bog and grassland restoration in Ireland. It can be seen from the examples above that the wind energy industry has the expertise to take on large-scale restoration work and collaborate with a wide range of conservation and regulatory bodies, research, landowners and communities to maintain these areas for the long-term. The wind industry can deliver a stable income for landowners and a stable ecosystem for biodiversity, not just in the short to medium term, but for decades.

The renewable energy industry is charged with delivering 80% onshore renewables on the Irish grid by 2030. The enormity of this challenge is brought into stark relief by the fact that it has taken almost 30 years to deliver the 4.8 GW of onshore wind currently on the system. The target of 9 GW is set to be achieved by 2030, in only 6 years' time. With 732MW of wind energy generating capacity currently installed within the Irish SPAs, and a further 347 MW installed within five kilometres of an Irish SPA, it is critical that Government policy must support the careful repowering of existing capacity in SPAs. A soon to be published report on Repowering in Ireland states that *"It will be important for Government to confirm the requirement and intention to, in principle, facilitate the repowering of the existing wind farm project located within or adjacent to the Irish SPAs, subject to the normal requirements of proper planning and sustainable development. It is considered essential that a strong signal is communicated by Government around its intention to retain as much wind energy capacity where it is already constructed within and adjacent to SPAs, adhering to other planning and environmental design criteria, in order to continue to utilise the other wind farm and electricity network infrastructure already facilitating the existing wind farms."*



Decommissioning wind farms in or adjacent to SPAs and other important hen harrier sites will not deliver the ambitious, collective action needed by industry, regulators, statutory bodies, NGOs, landowners and local communities. It will simply ensure that the legally binding climate change targets are unachievable without solving the underlying issues contributing to the species decline.

WEI comments on Cross Cutting Sectoral Actions 2024-2028 (Wind Energy) from draft HHTRP:

Topic	Issue	Action	WEI Comment
<b>Informing assessment procedures with fit for purpose data</b>	In order for wind energy development data from different developments to be comparable and aggregated for efficient strategic level analysis, the data collected needs to conform to particular standards. This would lead to an increase in the availability of comparable pre- and post-construction studies including carcass searches occurring across Ireland.	48 Produce and adopt best practice guidance documents in relation to hen harrier survey work in Ireland at appropriate scales to inform fit-for-purpose assessment processes and post-construction monitoring actions.	<p>In the absence of guidance produced by the Irish Government, there are several accepted good practice guidance documents and reference texts which are used effectively by ecologists working in the wind industry. Similarly, published good practice impact assessment guidelines, such as those prepared by the Chartered Institute of Ecology and Environmental Management (CIEEM)<sup>19</sup>, are already used as standard in preparing ecology documents.</p> <p>Post-construction monitoring actions are / should be site specific and the previously referenced guidance documents are also applicable in designing these.</p>

<sup>19</sup> <https://cieem.net/wp-content/uploads/2021/05/Good-Practice-Guide-2023-edit.pdf>



<p><b>Improving access to data</b></p>	<p>Efficient access to project level assessment documentation (including pre- and post-construction monitoring data) would further help in the assessments of in-combination and cumulative effects on hen harrier populations. The development of a facility to receive, store and report out on suspected bird collisions could also be a useful resource with regard to providing data from both monitored (with formal carcass searches) and unmonitored (<i>i.e.</i> ad hoc carcass recoveries) wind energy development.</p>	<p>49 Inter-Departmental Steering Group to decide on an appropriate mechanism for the establishment and maintenance of a central repository for relevant reports in order to facilitate:</p> <ul style="list-style-type: none"> <li>- Identification of effective mitigation measures</li> <li>- Adaptive management and</li> <li>- Cumulative effects assessments.</li> </ul>	<p>This issue of access to data is much wider than the hen harrier and this action is lacking in ambition to provide a meaningful, practical and tangible action for hen harrier. The issue of access to data is not related to the suggested actions of identification of effective mitigation measures and adaptive management. While WEI supports the creation of a centrally managed data repository, it is not the overriding issue for the hen harrier, and we do not believe it to be a key action in improving the conservation status of hen harriers. A data repository should not be limited to hen harrier data, and widespread engagement with all relevant stakeholders will be important to plan and implement it effectively.</p> <p>There are extensive peer reviewed papers, case studies and documented information of effective mitigation of effects of wind farms on hen harriers. It may be more useful if NPWS was to strengthen its knowledge around current methods used in wind farms in Ireland and the UK to avoid, reduce and offset effects. Land management measures to offset effects on foraging birds are already well established and demonstrated to be effective through Agri-environment schemes. These measures are being adapted and applied in wind farm developments currently.</p> <p>WEI is willing to facilitate information sessions and stakeholder workshops on any of these topics to assist effective implementation of the HHTRP actions.</p>
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<p><b>Promoting effective cumulative level assessments, including collision risk modelling, at various scales</b></p>	<p>SEAI will maintain the Wind Atlas, a publicly available digital map of Ireland’s wind resources, which includes data and spatial information regarding wind energy development Ireland. The Wind Atlas is underpinned by a spatial turbine database held by the SEAI, which includes data and spatial information on a turbine by turbine basis. To, <i>inter alia</i>, promote effective cumulative level assessments, including collision risk modelling at various scales, this database and maintained into the future through the addition of locations of recently developed turbines.</p>	<p>50 Continue to develop and maintain the Wind Atlas and turbine database of wind turbines in Ireland.</p>	<p>WEI welcomes the sharing of information, but the proposed centrally held database is more likely to be useful for this action, rather than the SEAI Wind Atlas. The spatial information on turbines is far less important than data collected on hen harrier during the planning process and any ongoing monitoring during construction and operation.</p> <p>Collision risk modelling is not likely to be meaningful or possible to carry out without raw data.</p> <p>This topic, issue and proposed action provide no clear path or ambition in terms of reducing threats to hen harrier due to wind energy development.</p>
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<p><b>Efficacy of adaptive management measures, including for offsetting purposes</b></p>	<p>Many wind energy developments have a requirement for ongoing monitoring of their effects on protected habitats and species, and some undertake proactive habitat management measures, including for offsetting purposes. There are gaps in knowledge regarding the efficacy and impact of these techniques in managing the interaction of wind energy developments with hen harrier populations.</p>	<p>51 Review the efficacy of adaptive management measures, and offsetting, with respect to wind energy developments and hen harriers in Ireland</p>	<p>WEI recommends consideration of the multiple agri-environmental schemes and land management measures that are documented and demonstrated to benefit hen harrier.</p> <p>It appears the use of the term adaptive measures may have been incorrectly applied here as commitments to land management (habitat management) must be in place at planning permission and clearly defined in terms of areas and measures if we are discussing it as compensation or offsetting. Natural Resource Wales <sup>20</sup> describe the application and use of Adaptive management as follows “<i>Adaptive management should only be used to allow projects to proceed where there is still uncertainty despite having completed a robust environmental assessment, or where the environmental baseline is likely to change.</i></p> <p><i>Adaptive management is a medium to long-term strategy focused on the potential unacceptable effects of a project.</i></p> <p><i>It should only be adopted after all reasonable efforts have been taken to confirm if an effect is likely to occur and where significant uncertainties remain.”</i></p> <p>Thus, adaptive management is certainly a useful approach in certain scenarios, for example where mortality of birds or bats is occurring in a manner that was not predicted then adaptive management would be applicable to reduce this unpredicted risk. However, a much more robust</p>
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<sup>20</sup> Adaptive Management <https://naturalresources.wales/guidance-and-advice/business-sectors/marine/using-adaptive-management-for-marine-developments/>

			and meaningful approach to issues around collision and displacement is in use and applied at Irish wind farms. Where unexpected effects or higher levels of predicted effects occur, adaptive management should then be applied and may of modifications to habitat at particular turbines or perhaps seasonal and / or temporal curtailment of turbines.
<b>Robustness of Environmental Assessments</b>	Wind energy policy statements, strategies or frameworks that are developed, and their associated necessary environmental assessments (i.e. SEA, AA), should reference and address the findings of this Threat Response Plans and the supporting report on Hen Harrier Conservation and the Wind Energy Sector in Ireland.	52 Complete all necessary environmental assessments (e.g. SEA, AA) with reference to the findings of this Plan and supporting reports	WEI supports ensuring that the EIA process is as streamlined and robust as possible. As it is already a legal requirement under various EU Directives to carry out all necessary environmental assessments WEI would welcome further information as to how this action in the HHTRP will further benefit the hen harrier or how its implementation will further address threats.
<b>Wind Energy Development Guidelines</b>	Finalisation of the revised Wind Energy Development Guidelines following completion of its SEA and AA.	53 Finalise and publish the Wind Energy Development Guidelines.	WEI welcomes the finalisation of the WEDGs and would welcome further information as to how the guidelines will relate to hen harrier conservation.

<p><b>Early identification of potential problems</b></p>	<p>Pre-application discussions with relevant stakeholders can identify potential nature conservation conflicts at an early stage including implications for non-designated regionally important breeding areas, to minimise cost and time implications for all parties</p>	<p>54 Undertake pre-application meetings at an early stage of the pre-planning process, where requested or where the scale of the development mandates same.</p>	<p>WEI strongly welcomes the inclusion of this action in the draft HHTRP and urge that it be given utmost priority.</p> <p>We note that developers and consultants already attempt to carry out such discussions but both capacity issues and limited availability of appropriate skillsets within the overburdened advisory agencies, eNGO and other stakeholders means that it is rare to be able to engage meaningfully. In other jurisdictions e.g. Scotland, the advisory bodies such as NatureScot can provide meaningful advice and direction on scope of work and agree approaches. WEI would welcome a similar approach be taken in Ireland.</p> <p>A lack of capacity can hamper the ability to have meaningful engagement which can lead to confusion and lack of consistency. NPWS and other stakeholders such as the relevant eNGOs need to be sufficiently funded and resourced to reduce the strain on existing staff and enable both the provision of additional staff suitably experienced in proportionate and well scoped impact assessment, along with any necessary upskilling of existing staff, if they wish to address potential problems meaningfully and without considerable delays.</p> <p>There is no current government policy underpinning the needs of hen harriers and this further compounds issues such as what exactly policy and law dictates for hen harrier in “regionally important breeding areas”. There appears to have been little consideration been given to the stated government policies around climate change and the European Directives on renewables and how NPWS proposes to develop the HHTRP to ensure such policies are followed and adhered to.</p>
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			Again, WEI is more than willing to assist and support NPWS and other stakeholders with facilitating a two-way flow of information and knowledge sharing through various modes of stakeholder engagement.
<b>Collation of relevant planning documents</b>	Several Local Authorities have developed wind energy strategies within the Local Authority Development Plan process that include defined areas where potential wind energy development may be favoured or not. A centralised web and GIS resource that collates such strategies and maps would be of value	55 Inter-Departmental Steering Group to decide on an appropriate mechanism to establish and maintain a centralised web and GIS resource that collates local authority wind energy strategies and maps of areas where wind energy development may be less favoured.	WEI would welcome further information as to how this action will address hen harrier population decline.

<p><b>Promoting high quality assessments</b></p>	<p>Sectoral-specific guidance to inform the assessment of hen harrier with regard to proposed wind energy developments (including repowering) and the adoption of a tool-box approach to avoiding or offsetting negative impacts is warranted. Guidance should consider the implications of developments for SPAs and non-designated regionally important breeding areas.</p>	<p>56 Produce assessment guidelines for hen harrier and proposed wind energy development and repowering.</p>	<p>WEI supports promotion of high-quality assessments but recommends adoption of existing sectoral guidance such as that produced by NatureScot and adopted as standard in Ireland. Implications for SPAs are already dealt with through appropriate assessment.</p> <p>Non-designated regionally important breeding areas are not called out in legislation or policy but are already fully considered through the EIA process.</p> <p>Given the urgency in developing and implementing meaningful actions, WEI strongly recommends avoiding “reinventing the wheel” where possible.</p>
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## Conclusion:

The development of new Irish wind farms, and the repowering of existing ones, is the cornerstone of Ireland's response to the climate emergency.

Ireland's wind farms will provide the bulk of the country's electricity in a future zero-carbon electricity system which will enable the decarbonisation of Ireland's energy system. We need to accelerate the development of onshore wind energy.

But, at the same time, this must be done in a way which protects, enhances and supports native biodiversity. We firmly believe that wind farms are not contributors to Ireland's biodiversity crisis, we are part of the solution.

Similarly, we believe we have set out in this paper, and evidenced in case studies provided by our members, that wind farms are not threats to the hen harrier but, through sensitive project design and innovative approaches to land-use, they can be part of protecting, restoring and supporting a thriving Irish hen harrier population.

To do this we are ready to work with the NPWS and environmental NGOs to share data, experience and insight, to learn from each other and to support each other, to do all that is needed to protect one of Ireland's most iconic species.

The HHTRP has the potential, if designed based on rigorous scientific evidence, conscious of the climate emergency and bringing together the relevant Government, industry and environmental stakeholders to be the driving force in bringing the hen harrier back from the brink of extinction.





Thank you for the opportunity to provide feedback on the Draft Threat Response Plan for the Hen Harrier 2024-2028 Consultation. We hope you consider the comments and recommendations made within our submission and we would be happy to engage at any point to discuss.

Yours sincerely,

A handwritten signature in black ink that reads "Éabhlín Byrne". The signature is written in a cursive style and is placed on a light grey rectangular background.

Éabhlín Byrne  
Senior Analyst  
Wind Energy Ireland