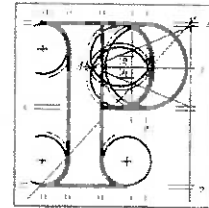


Case Number: ABP-316178-23



An  
Bord  
Pleanála

Mayo County Council  
Áras An Chontae  
The Mall  
Castlebar  
Co. Mayo  
F23WF90

Date: 26 June 2024

**Re:** Proposed development of Oweninny Windfarm Phase 3 consisting of 18 no. wind turbines.  
Within the townlands of Laghtanvack, Croaghaun (also known as Croaghaun West), Moneynieran,  
Corvoderry, Shanvolahan, Dooleg More, Shranakilly, Bellacorrick and Shanvodinnaun, Co. Mayo.

Dear Sir / Madam,

Enclosed for your information are two copies of the submission received by the Board from the following in relation to the above-mentioned proposed development:

Please ensure that a copy of this submission is available for public inspection at the offices of the planning authority.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

*Lauren Murphy*

Lauren Murphy  
Executive Officer  
Direct Line: 01-8737275

PA07

Teil  
Glao Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

Tel  
LoCall  
Fax  
Website  
Email

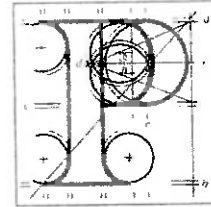
(01) 858 8100  
1800 275 175  
(01) 872 2684  
[www.pleanala.ie](http://www.pleanala.ie)  
[bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902



**Our Case Number:** ABP-316178-23



**An  
Bord  
Pleanála**

Development Applications Unit  
The Manager  
Newtown Road  
Wexford  
Co. Wexford  
Y35 AP90

**Date:** 26 June 2024

**Re:** Proposed development of Oweninny Windfarm Phase 3 consisting of 18 no. wind turbines.  
Within the townlands of Laghtanvack, Croaghaun (also known as Croaghaun West), Moneynieran,  
Corvoderry, Shanvolahan, Dooleg More, Shranakilly, Bellacorrick and Shanvodinnaun, Co. Mayo.

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Lauren Murphy  
Executive Officer  
Direct Line: 01-8737275

PA09

**Teil**  
**Glaao Áitiúil**  
**Facs**  
**Láithreán Gréasáin**  
**Riomhphost**

**Tel** (01) 858 8100  
**LoCall** 1800 275 175  
**Fax** (01) 872 2684  
**Website** [www.pleanala.ie](http://www.pleanala.ie)  
**Email** [bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902



## Lauren Murphy

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**From:** LAPS  
**Sent:** Tuesday 11 June 2024 09:57  
**To:** Lauren Murphy  
**Subject:** FW: Ref: ABP-316178-23  
**Attachments:** Mayo SID-MO-2023-011.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** David OConnor (Housing) <David.OConnor@npws.gov.ie>  
**Sent:** Monday, June 10, 2024 3:23 PM  
**To:** LAPS <laps@pleanala.ie>  
**Subject:** Ref: ABP-316178-23

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A chara

Please find attached Nature Conservation observations/recommendations for the above mentioned planning application.

Kindly forward a copy of your decision to [referrals@npws.gov.ie](mailto:referrals@npws.gov.ie) as soon as it issues.

In addition, please acknowledge receipt of the attached letter (as required under Article 29(2) of the Planning & Development Regulations 2001).

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: [referrals@npws.gov.ie](mailto:referrals@npws.gov.ie)

Kind regards,

David O'Connor  
*Executive Officer*

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta  
Department of Housing, Local Government and Heritage  
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

---

[David.oconnor@npws.gov.ie](mailto:David.oconnor@npws.gov.ie)  
[Manager.DAU@npws.gov.ie](mailto:Manager.DAU@npws.gov.ie)





**An Roinn Tithíochta,  
Rialtais Áitiúil agus Oidhreachta**  
Department of Housing,  
Local Government and Heritage



**Your Ref: ABP-316178-23**

**Our Ref: SID-MO-2023-011**

10 June 2024

Secretary  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1  
D01 V902

Via email: [laps@pleanala.ie](mailto:laps@pleanala.ie)

Re: Notification to the Minister for Housing, Local Government and Heritage under the Planning and Development Act, 2000, as amended.

**Re: Oweninny Windfarm Phase 3 for Bord na Mona Powergen Ltd at Bellacorick,  
County Mayo**

A Chara,

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated heading:

#### **Nature Conservation**

These observations are intended to assist An Bord Pleanála in meeting their obligations in relation to National and EU legislation and policies for nature conservation and biodiversity, in the context of the current application.

The Department considers that the applicants' response does not adequately address the comments made by the Department in relation to the appropriate reference population for determining the significance of collision mortality impacts. The Department stated the following in the original submission;

*"Percival (2003) states that 'one issue in this process concerns the precise area or bird population against which the degree of impact should be judged. For protected SPAs this is usually quite straightforward, comprising simply the populations for which that site has been designated' (Percival, 2003). Outside of protected sites Percival (2003) recommends that analysis be undertaken as to whether a homogenous area of suitable habitat occurs with which a population may be associated and the density that this area may contain' "*

**Aonad na nIarratas ar Fhorbairt, Oifigí an Rialtais, Bóthar an Bhaile Nua, Loch Garman, Y35 AP90**  
Development Applications Unit, Government Offices, Newtown Road, Wexford, Y35 AP90  
[manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie)  
[www.gov.ie/housing](http://www.gov.ie/housing)



In relation to Golden Plover the Further Information provided by the applicant does not address this point adequately. Instead it makes reference to wintering county populations of Golden Plover only when determining the significance of the potential collision mortality impacts on this species. This is problematic for two separate and related reasons. First, no differentiation is made between potential collision mortality impacts on the breeding and wintering populations, and second, no rationale is provided for using the county boundary, which is an administrative boundary, as being synonymous with an area of suitable habitat. The population of breeding golden plover is very different in size, and distribution, from the population of wintering golden plover. The national breeding population of golden plover is approximately 100 pairs, and is concentrated in the upland areas of Mayo, Galway, Donegal, Sligo and Leitrim. The wintering population of Golden plover is approximately 80,707, and distributed nationally. Consequently a small loss of 0.27 birds per year during the breeding season, and contextualised in the appropriate biogeographic area, may be more significant than a loss of 6.50 birds during the wintering season. If, for example, you assumed the breeding population within the adjacent upland area of North West Mayo amounts to 25 pairs (roughly a quarter of the national breeding population) then a loss of 0.27 birds would amount to an increase of approximately 2% on the annual mortality rate of this population (following the assumptions outlined in the report). Such a loss, particularly taken in combination with other wind farms, both developed and proposed, could result in a significant adverse effects to a breeding population in the uplands of North West Mayo that is already in decline. Any such a loss may also affect the range of this species nationally, and, as such, result in a national level effect.

The rationale provided for excluding a separate analysis on the breeding population of Golden Plover is that the potential collision impacts occur outside of the 'peak' breeding season (in September). However, the Department notes that, for the purposes of determining the effect on a breeding population of Golden Plover, it is not clear why it would matter when such an impact would occur during this season and whether it occurred on breeding pairs, failed breeding birds, or recently fledged young. All such impacts would potentially constitute an effect on the breeding population unless a good argument is made as to why this is not the case.

In Scotland NatureScot recommends the use of Natural Heritage Zones (NHZ) which are biogeographical units that represent areas with similar biogeographic character, similar habitat assemblages, and species populations. Any impact is first contextualised in terms of the populations of these areas before being contextualised nationally. These areas are not synonymous with administrative areas such as county boundaries. The use of such areas is particularly important when a population is distributed unevenly across the country, as is the



case with the population of breeding Golden Plover in Ireland, and where a concurrent area of suitable habitat crosses a number of administrative / county boundaries. In Ireland there is currently no equivalent units being recommended for use. The Department, however, notes that administrative boundaries such as county boundaries may not always be appropriate depending on the individual application and what habitats, or assemblage of habitats, the relevant population is associated with, and as such should not be used as the default without adequate explanation. The Department recommends that An Bord Pleanála ensures that it is satisfied with the approach being taken by the consultants within this context for each application.

An Bord Pleanála has obligations under Article 6.3 of the Habitats Directive (92/43/EEC). Competent national authorities, are to authorise activity only if they have made certain that it will not adversely affect the integrity of a European site. That is the case when there is no reasonable scientific doubt as to the absence of such effects.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at [referrals@npws.gov.ie](mailto:referrals@npws.gov.ie), where used, or to the following address:

The Manager  
Development Applications Unit (DAU)  
Government Offices  
Newtown Road  
Wexford  
Y35 AP90

Is mise, le meas

A handwritten signature in blue ink, appearing to read 'David O'Connor', with a horizontal line underneath.

David O'Connor  
Development Applications Unit  
Administration

