

An
Bord
Pleanála

Memorandum ABP-316178-23 – Circulation of submissions

To: Una Crosse, ADP
From: Elaine Clarke, Inspector
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.
Date: 21st November 2024

This Memo relates to submissions/observations received in May and June 2024 following the advertisement of significant further information (Part A) and those received following the receipt of and circulation of additional information in October 2024 (Part B).

Part A – Submissions following Significant Further Information (May and June 2024)

Submissions were received following the publication of significant additional information notices and are summarised below:

TII:

- TII's concerns as raised in previous submissions (18th May 2023 and 10th November 2023) remain and it has no specific observations to make in relation to the significant additional information.

Irish Aviation Authority (IAA):

- In the event of a grant of permission, a condition should be attached to contact the IAA to agree specific matters.

Department of Housing, Local Government & Heritage, Development Applications

Unit:

- Considers that the applicant's 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.
- Regarding the wintering county populations of Golden Plover, no differentiation is made between potential collision mortality impacts on the breeding and wintering population. In addition, no rationale is provided for using the county boundary which is an administrative boundary as being synonymous with an area of suitable habitat. Also states that the population of breeding golden plover is very different in size, and distribution, from the population, from the population of wintering golden plover, stating a loss for breeding golden plover could be more significant than losses during the wintering season.
- 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, however it is not clear why it would matter when such an impact would occur during this season, all such impacts would potentially constitute an effect on the breeding population.
- References NatureScot approach used in Scotland which recommends the use of Natural Heritage Zones – biogeographical character, where impact is contextualised in terms of the populations of these areas before being contextualised nationally. While not in use in Ireland, administrative boundaries such as county boundaries may not be appropriate.
- Advises the Board of its obligations in relation to the Habitats Directive.

I have considered the matters raised in the submissions and am satisfied that no new issues are raised that warrant further responses from the applicant. With respect to the DHH&LG submission, please note that the matters raised have

previously been considered by the applicant in the response to submissions (July 2023) and in the response to the request for further information (March 2024).

Part B – Submissions following Additional Information (October 2024)

My previous Memos dated 3rd and 23rd October 2024 relates. The applicant was requested to provide both the ITM and Eircode for each of the 78 shadow flicker receptors with an annotated map indicating each of the receptors. The response was not considered to significant additional information however the applicant's response was circulated to interested parties for their comment. Submission were received from TII, Hugh Broderick, James Gallagher, John G. Moyles Senior & Family and Rob Deane.

TII

- TII refer to earlier submissions made and advise that it has no specific observations to make in relation to the further additional information.

Third Parties (public submissions)

- Several of the third-party submissions refer to issues previously raised or issues unrelated to the subject of the further information circulated.
- I note that one submission raises a series of questions including relating to results from these receptors, procedures and monitoring.
- Another submission states that the receptor was not placed at their house but in a field across the road in 2022 and that no data was ever provided; the data are requested. This submission also queries whether a new receptor was to be installed at their property in 2024 and request a new receptor is installed in the location indicated on the map.
- Another submission states that shadow flicker from the existing 2 phases affects a number of houses on a regular basis.

I have considered the matters raised in the submissions and am satisfied that no new issues are raised that warrant further responses from the applicant.

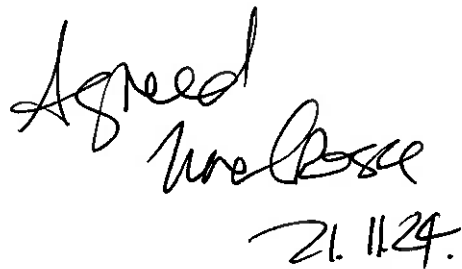
Conclusion

Having regard to the foregoing I consider that the submissions received should be circulated to the applicant for information purposes only.



Alaine Clarke

Inspectorate



21.11.24.