


An
Bord
Pleanála

Memorandum ABP-316178-23

To: Stephen Kay, ADP
From: Alaine Clarke
Re: Proposed development of Oweninny Wind Farm Phase 3 consisting of 18 wind turbines. Applicant: Bord na Mona Powergen Ltd
Applicant: ~~Monaghan County Council~~ *Bord na Mona* 
Date: 28th May 2024

1.0 Foreword

This application has previously benefitted from ecological advice from Maeve Flynn, ecologist, see attached document (sent by email 17th Jan 2024).

2.0 Site Location and Description

- 1.1. This is an application for 18 no. turbines windfarm and associated works including a 110kV substation compound and underground cable connection from the proposed substation to the existing substation at Bellacorick in the townlands of Laghtanvack, Croaghaun (also known as Croaghaun West), Moneynieran, Corvoderry, Shanvolahan, Dooleg More, Shranakilly, Bellacorrick and Shanvodinnaun, Co. Mayo. The proposed development will be referred to as Oweninny Wind Farm Phase 3 and will have an electrical output of c. 90MW. The Oweninny Wind Farm has been developed to date in two phases. Phase 1, to the N/NW of the proposed development site consists of 29 turbines (93MW), commissioned in 2019. Phase 2, to the W of the proposed development site consists of 31 turbines (99MW). The proposed development also seeks to replace the existing 21 no. existing Bellacorick Wind Farm, established in 1992.

- 1.2. The proposed development site is located at Oweninny Bog in north Co. Mayo, a relatively sparsely populated area. The site is situated in the eastern part of Oweninny Bog, approximately 12km west of Crossmolina and 15km east of Bangor Erris and just north of the N59 national road. The site area of the proposed development is approximately 2,345 hectares. The closest settlement to the site is Bellacorick village which is located approximately 2km from the southwestern extents of the site. The site comprises cutaway bog, with industrial scale milled peat production operations having formerly occurred at the site for over 50 years and which supplied the ESB Bellacorick peat fired power station. Milled peat production ceased in 2005 following the closure of the power station and the power station was later decommissioned. Several other windfarm and energy developments are existing or in planning in the vicinity.
- 1.3. Lough Dahybaun, a special area of conservation (SAC), protected under the EU Habitats Directive, is located on the southern boundary of the site, while the Bellacorrick Bog Complex SAC borders the site to the south and east. Bellacorrick Iron Flush SAC is located 500m to the north. Owenduff/Nephrin Complex SPA and SAC are located 3.8km to the southwest. The Owenduff/Nephrin Complex SPA is designated for two SCIs; the Golden Plover and Merlin. There are no site-specific conservation objectives for the SPA.

3.0 Proposed Development

- 2.1 A 10-year planning permission and 30-year operational life is sought for:
- 18 no. wind turbines with an overall blade tip height of 200m, a rotor diameter of 158m, a hub height of 121m and all associated foundations and hard-standing areas in respect of each turbine;
 - Decommissioning and removal of 21 no. existing Bellacorrick Wind Farm wind turbines (including tower sections, nacelle, hub, and rotor blades);
 - Construction of new internal site access roads, approximately 29,000m in length (permanent and temporary), passing bays, car parking and associated drainage;
 - Construction of an amenity route through the site to the existing Visitors Centre with access from a local road off the N59 near Dooleeg;

- 2 no. borrow pits;
- 5 no. peat deposition areas;
- Installation of 1 No. permanent Meteorological Mast 120m high, and the decommissioning and removal of an existing 100m Meteorological Mast on site;
- 4 no. temporary construction compounds, including material storage, site welfare facilities, and site offices;
- 1 no. 110kV electrical substation compound and associated structures. All associated underground electrical and communications cabling connecting the wind turbines to the proposed substation;
- All works associated with the connection of the proposed wind farm to the national electricity grid, including a 110kV underground electrical cable from the proposed on-site electrical sub-station to the existing substation at Bellacorick;
- All related site works and ancillary development including (but not limited to):
 - Earthworks;
 - Peat management works;
 - Site security;
 - Groundwater and surface water management;
 - Overburden (soils/peat) storage and management; and
 - Site reinstatement, landscaping and erosion control.

4.0 Further Information

Further information (by correspondence dated 24th January 2024) was sought from the applicant in respect of the following:

- site layout plan (indicating existing structures);
- AA Screening & NIS (Owenduff/Nephin Complex SPA should be screened in – addendums to AA Screening Report and NIS sought);
- Ornithology (addressing DAU's concerns regarding population figures and thresholds, with further justification required in the collision risk model. Addendum to the Ornithology Impact Assessment requested);
- Bat survey (clarifying bat activity at borrow pit);
- Hydrology & hydrogeology (requesting details of culverts, wet or dry extraction, and the need for a 40 ha borrow pit area);
- Peat stability (clarifying statement in EIAR);

- updated EIAR addendums, as may be necessary.

A response from the applicant was received on 20th March 2023. The response includes a revised AA Screening Report, a revised NIS and an EIAR addendum report. It was considered the further information request included significant additional information and revised public notices were requested.

The significant information is presently out for public display/consultation and submissions are invited **up to and including 10th June 2024**.

Having regard to:

- The information provided by the applicant including the revised NIS, revised AA Screening Report and the addendum to the EIAR;
- The submissions received to date from prescribed bodies and observers,
- Further relevant submissions that may be *Received*. *AK*

I recommend that further ecological advice is sought in respect of the revised NIS, in particular matters relating to ornithology.

Alaine Clarke

Alaine Clarke
Inspectorate

Agreed
Stephen Kery,
28.5.2024.

text

 Maeve Flynn <m.flynn@pleanala.ie>

Wed 17/01/2024 12:22

To:Alaine Clarke <a.clarke@pleanala.ie>

 1 attachments (21 KB)

text for FI request _MF.docx;

Hi Alaine,

Here is suggested text- see what you think and then work away!

Kind regards,

Maeve

Maeve Flynn

Inspectorate

Ext: 7189

Má fhaigheann tú an ríomhphost seo lasmuigh de na gnáthuaireanta oibre, ní bheidh mé ag súil le freagra ná gníomh lasmuigh de d'uaireanta oibre féin.

If you receive this email outside of normal working hours, I do not expect a response or action outside of your own working hours

1. AA Screening: Owenduff/Nephin Complex SPA

- (a) The Department of Housing, Local Government and Heritage, by submission dated 22nd June 2023, expressed concern that the Owenduff/Nephin Complex was screened out from further consideration/assessment in the NIS as it considered that it is uncertain whether the proposed development is likely to have significant effect on this European Site. Notwithstanding the applicant's response to the submission and the argument put forward that Owenduff/Nephin Complex SPA is not required to be screened in, you are advised that the Board shares the opinion of the Department that further detailed information is required to adequately address the legal tests of the Appropriate Assessment (AA) process including in-combination effects with other projects in the area, and consider that Owenduff/Nephin Complex SPA should be screened in because of uncertainty of effect and should be subject to further detailed analysis in the NIS.

You are therefore requested to submit an Addendum to the AA Screening Report and NIS which screens in Owenduff/Nephin Complex SPA due to uncertainty of significance of effects either alone or in combination with other plans and projects. The NIS should be supported by scientific evidence as to why the Golden Plover and Merlin recorded at the windfarm site are or are not associated with the Owenduff/Nephin Complex SPA populations and why any potential impacts caused by the proposed development would not undermine the conservation objectives of the Golden Plover and Merlin of the SPA so as to exclude adverse effects on site integrity beyond reasonable scientific doubt. In the absence of detailed site-specific conservation objectives for this SPA, the best available scientific information should be relied upon including reference to the Natura 2000 data form and any more up to date information on the species distribution and breeding status currently available (See Suddaby, D. & O'Brien, C. (2020) A survey of breeding Golden Plover within the Owenduff/Nephin Complex SPA, County Mayo. Irish Wildlife Manuals, No. 120.). You should also consider the relevance of application of the targets and objectives set for both Special Conservation Interest species Breeding Golden Plover and Merlin for Connemara Bog Complex SPA [004181]. The assessment should also take account of any possible in-combination effects

with the lodged planning application of Sheskin South windfarm (Reference ABP-315933-23 and sheskinsouthwfplanning.com).

2. Ornithology

The Board acknowledges the Applicants response related to the DAU submissions on the use of national population figures e.g. for Golden Plover and use of arbitrary thresholds however, you are advised that the Board is not satisfied that this explanation is adequate in terms of its application to the impact assessment process in either the EIAR or the NIS.

The use of national population figures to determine magnitude of effects at a local level is not appropriate as clearly described in the Departments submission. We request that the applicant further engages with the request of the Department in the impact assessment presented in the EIAR and NIS.

Similarly, the Board considers that further scientific justification for the use of arbitrary thresholds should be integrated into the rationale for the collision risk model.

You are therefore requested to submit an addendum to the Ornithology impact assessment and the NIS as relevant, clearly setting out the rationale behind the use of arbitrary thresholds for the collision risk model and also addressing the significance of predicted bird collision mortality at a more locally relevant level having regard to Percival methodology on same.