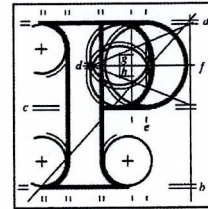


**Our Case Number: ABP-317560-23**



**An  
Bord  
Pleanála**

~Minister for Housing, Local Government and Heritage  
Development Applications Unit  
Wexford  
Co. Wexford

**Date:** 01 September 2023

**Re:** Proposed windfarm development including 13 no. wind turbines in Bunnyconnellan, Co. Mayo and hydrogen plant in Castleconnor, Co. Sligo.  
Carrowleagh, Bunnyconnellan, Co. Mayo and Curraun, Castleconnor, Co. Sligo.

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 or email [sids@pleanala.ie](mailto:sids@pleanala.ie) quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,

  
\_\_\_\_\_  
Ashling Doherty  
Executive Officer  
Direct Line: 01-8737160

PA09

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glao Áitiúil</b>	<b>LoCall</b>	1800 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

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



**Planning Ref:** PA16.317560

*(Please quote in all related correspondence)*

31 August 2023

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

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

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

**Proposed Development:** SID application for proposed windfarm development including 13 no. wind turbines at Bunnyconnellan, Co. Mayo & hydrogen plant in Castleconnor, Co. Sligo

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 headings.

**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 notes that the Biodiversity Enhancement and Management Plan (Appendix 5.4 of the EIA) does not require the cessation of peat cutting within the application site

The Environmental Impact Assessment Report (EIAR) provided with the application implies that peat cutting will continue within the application area throughout the lifecycle of the proposed development. However, while various chapters of the EIAR acknowledge the existing impact of peat cutting, the potential extent and intensity of this impact within the application site over the lifecycle of the proposed development is not characterised within the EIAR. The Department considers that if peat cutting continues within the application site it will constitute a form of management within the application site which may result in significant impacts during the proposed development. Consequently, the Department considers that any

**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





peat cutting that will occur within the application site during the development should be assessed in detail to inform the EIA determination undertaken by An Bord Pleanála.

The Department notes that the Biodiversity Enhancement and Management Plan (Appendix 5.4 of the EIAR) does not require the cessation of peat cutting within the application site. The Department requests that An Bord Pleanála consider whether the continuance of peat cutting within the application site during the life of the proposed development is compatible with the peatland policies and objectives set out in the Mayo County Development Plan 2022- 2028. The relevant peatland policies and objectives are as follows;

- **NEP 9** *To enhance the county's natural heritage and biodiversity through supporting the protection and restoration of peatlands in County Mayo, where appropriate, in order to transition towards a low-carbon and circular economy.*
- **NEP 10** *To recognise the role of peatlands as carbon sinks to combat climate change and ensure that peatland areas, including those designated or proposed for designation (pNHA, NHA or SAC), are conserved for their ecological, climate regulation, archaeological, cultural and educational significance.*
- **NEO 18** *As part of the implementation of Climate Ready Mayo, Climate Adaption Strategy, to develop and implement a Peatland Management Strategy for County Mayo that will: (a) To identify damaged Peatlands in the county and those at risk from climate change and becoming carbon emitters. (b) To initiate conservation and management of Mayo's peatlands, particularly those sites nominated for designation as Special Areas of Conservation and Natural Heritage Areas, to preserve the habitat and their unique ecosystems, managing flood risk and other environmental benefits.*
- **NEO 19** *To actively increase public awareness of the importance of peatlands as carbon sinks to combat climate change.*

The Department considers that while the peatland within the application site is not designated, and is already extensively damaged through historic peat cutting, the consent of the proposed development presents an opportunity for the application site to be managed to minimise further damage, restore peatland habitats, minimise sediment loss, and reduce the oxidisation of peat which is a source of carbon within the application site.

### **Archaeology**

It is noted that the EIAR submitted as part of the planning application includes a desk-based Archaeological Impact Assessment (AIA) which was carried out in relation to the proposed development by John Cronin & Associates (EIAR Chapter 14; date June 2023).

It is also noted that Recorded Monument MA031-034---- (Megalithic tomb - court tomb) is located within the proposed development site. This monument has statutory protection under Section 12 of the National Monuments (Amendment) Act 1930-2014. While no direct impacts to this monument are anticipated if the development is permitted, the AIA has established that there will be an indirect impact (impact on setting) to this monument at Operation Stage





(EIAR Section 14.5.5). It is noted that even with all mitigation measures implemented, the magnitude of the effect to this monument of this indirect impact is considered to be Significant/Very Significant (EIAR Table 14.16).

The Department has reviewed the EIAR and advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C3, C5 and C6 as set out in *OPR Practice Note PN03: Planning Conditions* (October 2022), with appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

**Archaeological Requirements:**

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 14 of the EIAR (John Cronin & Associates; date June 2023) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in areas of proposed ground disturbance and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the Department of Housing, Local Government and Heritage in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works.
  - a. The report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in-situ, preservation by record (archaeological excavation) and/or monitoring may be required.
  - b. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the Department of Housing, Local Government and Heritage, shall be complied with by the developer.
  - c. No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority.
3. A suitably qualified archaeologist shall be retained to advise on, and establish appropriate Exclusion Zones around the external-most elements of vulnerable Heritage Assets (as identified in Chapter 14 of the EIAR) including Recorded Monuments MA031-034---- (Megalithic tomb - court tomb) and SL022-026--- (Barrow – unclassified).
  - a. Exclusion Zones shall be fenced off or appropriately demarcated for the duration of construction works in the vicinity of the monuments. The location and extent of each Exclusion Zone and the appropriate methodology for fencing off or



demarcating at each location shall be agreed in advance with the Department of Housing, Local Government and Heritage and the planning authority.

- b. No groundworks of any kind (including but not limited to advance geotechnical site investigations) and no machinery, storage of materials or any other activity related to construction will be permitted within Exclusion Zones.
4. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 10 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.
5. The planning authority and the Department of Housing, Local Government and Heritage shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

**Reason:** To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

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

Simon Dolan  
Development Applications Unit  
Administration

**Ashling Doherty**

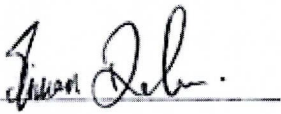
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**From:** Simon Dolan (Housing) <Simon.Dolan@npws.gov.ie>  
**Sent:** Thursday 31 August 2023 11:14  
**To:** SIDS  
**Subject:** SID application PA16.317560 for Windfarm development in Bunnyconnellan, Co. Mayo & hydrogen plant in Castleconnor, Co. Sligo  
**Attachments:** SID-SL-Firlough Windfarm.pdf

A Chara,

Attached please find the Archaeological & Nature Conservation recommendations.

Regards,



Simon Dolan

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta  
Department of Housing, Local Government and Heritage  
*Executive Officer*  
Aonad na nIarratas ar Fhorbairt  
*Development Applications Unit*  
Oifigí an Rialtais  
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