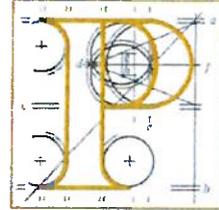


**Our Case Number:** ABP-318701-23



An  
Bord  
Pleanála

Department of Housing, Local Government and Heritage  
National Parks and Wildlife Service,  
Government Offices,  
St. Conlon's Road,  
Nenagh,  
Co. Tipperary

**Date:** 26 February 2024

**Re:** 10 year planning permission for the proposed wind energy development consisting of 22 wind turbines and all associated infrastructure located in the townlands of Glenora, Altderg, Keerglen, Ballykinlettragh, Ballycastle, Ballyglass, Killeena, Glencullin and Lugnalettin, Co. Mayo. ([www.glenorawfplanning.com](http://www.glenorawfplanning.com))

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

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

**Teil**  
**Glaó 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

**Lauren Murphy**

---

**From:** Simon Dolan (Housing) <Simon.Dolan@npws.gov.ie>  
**Sent:** Tuesday, February 20, 2024 12:09 PM  
**To:** SIDS  
**Subject:** SID application for a windfarm development in Glenora and adjacent townlands, near the village of Ballycastle, Co. Mayo. PA16.318701  
**Attachments:** ABP-SID-MCC-Ballycastle.pdf  
**Categories:** Lauren

**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,

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**  
*Government Offices*  
**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90**  
Newtown Road, Wexford, County Wexford, Y35 AP90

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



**Planning Ref: PA16.318701**

*(Please quote in all related correspondence)*

20 February 2024

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 a Windfarm development in Glenora and adjacent townlands, near the village of Ballycastle, Co. Mayo.

A chara

I refer to correspondence received in connection with the above. Outlined below are the Heritage related observations/recommendations 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.

#### **Drainage impacts on Inagh Bog NHA:**

Chapter 9 of the Environmental Impact Assessment Report (EIAR) on Hydrology and Hydrogeology identifies the potential of the proposed application to have a drainage effect on the Inagh Bog Natural Heritage Area (NHA). The EIAR states that in a worst case scenario approximately 3ha (equivalent to approximately 0.5% of the area of the NHA) could be affected by lowering the water levels in the peat, caused by drainage associated with the proposed infrastructure.

The Department notes that that the potential drainage impact on the Inagh Bog NHA is not characterised in Chapter 6 of the EIAR on Biodiversity. No botanical or habitat surveys were conducted in the areas of the Inagh Bog NHA which may be effected by the drainage impacts associated with the proposed wind farm infrastructure.

#### **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



Consequently, the relative sensitivity of those areas potentially effected within the Inagh Bog NHA, identified in Chapter 9 of the EIAR, are not characterised or discussed in terms of their conservation value. The Department recommends that any assessment of the significance of this potential impact should be undertaken with reference to the relative sensitivity of those areas affected and not simply done with reference to the quantity (3ha) of the site that may be effected. For example, the site synopsis states that the highest quality Blanket Bog habitat within the Inagh Bog NHA is located in the south eastern corner of the site, which may correspond to the area affected without further characterisation and analysis.

The Department recommends that any potential deterioration or loss of Blanket Bog, particularly active Blanket Bog, inside the Inagh Bog NHA should be avoided. The Department also notes that any such deterioration or loss of Blanket Bog inside the Inagh Bog NHA, for which this site is designated, may be in material contravention of the following policies and objectives in the Mayo County Development Plan 2022-2028 depending on how these policies are interpreted by An Bord Pleanála;

- **NEP 1** - To support the protection, conservation and enhancement of the natural heritage and Biodiversity of County Mayo, including the protection of the integrity of European sites, that form part of the Natura 2000 network, the protection of Natural Heritage Areas, proposed Natural Heritage Areas Ramsar Sites, Nature Reserves and Wild Fowl Sanctuaries (and other designated sites including any future designations).
- **NEO 8** - To maintain, protect and where possible enhance the natural heritage and biodiversity of bogs, fens and turloughs, where appropriate, in County Mayo.
- **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.

The Department recommends that if impacts on the Inagh Bog NHA cannot be avoided with the current proposed layout of turbines consideration should be given to a different layout, or a minor alteration of the existing layout, which avoids drainage impacts on the Inagh Bog NHA to ensure the conservation of this nationally designated site.

#### **Characterisation and analysis of Collision Mortality Impacts:**

The department considers that the Bird Impact Assessment Report does not accurately use the methodology outlined to determine the significance of the potential mortality caused by collisions with the proposed turbines. The Bird Impact Assessment Report makes reference to the methodology outlined by Percival (2003) for determining the magnitude of an effect on a given population (e.g. High = < 20% population remains, Negligible = < 1 % population lost). According to Percival (2003), the magnitude of impact on a species population as a result of collisions, would be negligible if the estimated mortalities does not increase the natural mortality rate by 1%. However, 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)<sup>1</sup>. Outside of protected sites Percival (2003) recommends that an analysis be undertaken as to whether a homogenous area of suitable habitat occurs with which a population may be associated and the density of this population within this area. In their guidance on this topic. However, in relation to the current proposed application, the Bird Impact Assessment Report makes reference to the national populations only when undertaking an analysis of the magnitude of the predicted collision risk impact on the species identified. For example, Section 4.3.3 of the Bird Impact Assessment Report makes reference to the national wintering population of Golden Plover, which is stated as 92,060 birds, when contextualising the estimated collision mortality of 10.491 bird per year during the lifetime of the proposed application. The Department also notes that the output, and subsequent analysis, of the collision risk modelling does not differentiate between the potential collision mortality on wintering populations and breeding populations. Section 3.3.1.9 of the Bird Impact Assessment Report outlines the records for Golden Plover during the surveys undertaken to inform the impact assessment. Golden plover were recorded in the zone of influence of the turbines during both the breeding and wintering period. As the population and distribution of Golden Plover in Ireland during the breeding season is significantly smaller than during the wintering season the Department considers that a separate analysis should be undertaken where collision mortality impacts occur in both seasons. The population of breeding Golden Plover in Ireland during the breeding season is approximately 150 pairs and has a very regional distribution in Ireland with the wider area of the application site being a stronghold for breeding Golden Plover. Consequently, a relatively small impact on the breeding population in this area caused by the current application, either alone or in-combination with other similar developments, could have a significant effect on the national breeding population of this species.

Percival's methodology requires an analysis of habitat suitability, and the potential density of species in such habitat, in the wider area of the application site in order to determine the baseline population from which to assess the magnitude of any impacts. Percival states that the *'populations of each important species at the wind farm within this zone should be estimated using the best available data on bird densities and habitat availability. These populations then constitute the baseline against which the magnitude of any predicted effects should be judged'* (Percival, 2003). For example, in relation to the current proposal, the foraging behaviour of Golden plover during both the breeding and wintering period (which differs), the habitats that this behaviour is associated with during the respective seasons, and the potential densities these habitats are likely to support, should be considered in relation to the wider area of the application site before a determination is made on the magnitude or significance of any impacts caused by the proposed development. This impact should only then be contextualised in a wider geographical context i.e. whether it has a local, county or nationally significant effect.

Section 4.6 of the Bird Impact Assessment Report discusses the potential cumulative or in-combination effects of the proposed application. The Department notes that this section identifies the potential for cumulative impacts of the current development with a number of other wind farms in the wider area which have been developed, granted consent, or are currently being considered for consent. For example, consideration is

---

<sup>1</sup> Steve M. Percival, (2003) BIRDS AND WIND FARMS IN IRELAND: A REVIEW OF POTENTIAL ISSUES AND IMPACT ASSESSMENT



given to the potential cumulative impacts of the current proposed application with the proposed Oweninny Wind Farm Phase 3, which is currently being considered by An Bord Pleanála, on Golden Plover. The proposed Oweninny Wind Farm Phase 3 occurs adjacent to the current proposed application and will also result in a predicted collision mortality of Golden Plover. The Department notes that while Section 4.6 of the Bird Impact Assessment Report identifies the potential for a cumulative effect in relation to this impact no analysis is undertaken of the significance of this impact on the relevant population. Furthermore, no differentiation is made between the potential mortality impacts on the breeding or wintering population of this species in Section 4.6. Such a differentiation would be useful to better understand the potential impacts on local populations. Section 4.6 also notes that there was no collision mortality analysis undertaken for Oweninny Phase 1 and Phase 2. Consequently, the cumulative impacts on Golden Plover, in relation to the wind farms already built, and under consideration for consent, in the wider area remains uncertain.

The Department notes that An Bord Pleanála should consider that Golden Plover are a red listed species whose population is in decline. The breeding population in Ireland is unevenly distributed with North West Mayo being one of its national strongholds due to the presence of suitable habitat. The Department recommends that any potential impact on this species should be characterised accurately in any EIAR and NIS provided with the application in order to ensure An Bord Pleanála has sufficient information while undertaking their determinations.

The Department also notes that while the above point has been illustrated with the use of Golden Plover as the example it is recommended the appropriate use of the methodology outlined by Percival (2003), and proposed in the EIAR, is used for all target species identified at risk of collision mortality, especially those for which a relatively substantially annual mortality is predicted (such as kestrel for the current proposed development).

### **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 Tobar Archaeological Services (EIAR Chapter 13; date 1 December 2023).

The Department of Housing, Local Government and Heritage 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 13 of the EIAR (Tobar Archaeological Services; date 1 December 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, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works.
  - i. 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.
  - ii. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the Department, shall be complied with by the developer.
  - iii. 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 13 of the EIAR).
  - i. 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 and the planning authority.
  - ii. 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 13 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 applicant shall retain the services of a suitably qualified archaeologist to advise on an archaeological mitigation plan for decommissioning of the development, to include mitigation measures for the removal of the turbines and the protection of any archaeological sites and monuments that are *in situ* at the site. The *Decommissioning Plan* shall be updated to include the location of any archaeological or cultural heritage constraints as set out in Chapter 13 of the EIAR and by any subsequent archaeological investigations associated with the project. It shall clearly describe all identified likely impacts from decommissioning—both direct and indirect—and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during decommissioning works.



6. The planning authority and the Department 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