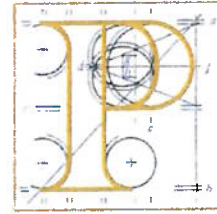


Our Case Number: ABP-319448-24



An
Bord
Pleanála

An Taisce
5 Foster Place
Dublin 2
D02 V0P9

Date: 29 May 2024

Re: Proposed Development of an 8 no turbine wind farm development and associated works on land within the townlands of Clonmellon, Kilrush Upper, Kilrush Lower, Newtown, Ballinlig, Carnybrogan, Cavestown and Rosmead, County Westmeath and Galboystown, Co. Meath. (www.knockanarraghwindfarmsid.ie)

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.

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,


Raymond Muwaniri
Executive Officer
Direct Line: 01-8737125

PA09

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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



An Taisce

The National Trust for Ireland

5 Foster Place

Dublin 2, Ireland

D02 V0P9

20240522-ABP-319448

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

Sent by email to: bord@pleanala.ie

22nd May 2024

Ref: ABP-319448-24

App: Knockanarragh Wind Farm Limited

For: Proposed Development of an 8 no turbine wind farm development and associated works

Site: on land within the townlands of Clonmellon, Kilrush Upper, Kilrush Lower, Newtown, Ballinlig, Carnybrogan, Cavestown and Rosmead, County Westmeath and Galboystown, Co. Meath.

A Chara,

We thank you for referring the above application to An Taisce for comment.

Proximity to Native and Potential Long-Established/Ancient Woodland

We note that the subject site is in close proximity to the Cavestown woodland area, which contains stretches of both native woodland and potential ancient and long established woodland which were identified by the NPWS during two separate surveys.

The native woodland survey was conducted between 2003-2008 ¹and aimed to achieve the following objectives:

1. To establish the area and character of native woodlands in Ireland.
2. To produce a national inventory of native woodland sites comprising a subjective sample representing the full range of woodland diversity in Ireland.
3. To produce a national classification system for native woodlands based objectively on data recorded in the field, to compare this system with existing schemes and make recommendations for improvement.
4. To evaluate the conservation value and threat status of all surveyed sites and highlight undesignated sites which may be worthy of protected status.
5. To examine the structure, regeneration status and timber resource of native woodlands in Ireland.
6. To produce monitoring guidelines for the ongoing assessment of Annex I woodland habitats.

¹ https://www.npws.ie/sites/default/files/publications/pdf/Perrin_et_al_2008_NSNW_V1.pdf

An Taisce is a membership-based charity | Join us at www.antaisce.org/membership

An Taisce – The National Trust for Ireland | *Protecting Ireland's heritage, safeguarding its future*

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Directors: Stuart McCaul (Chair), Trish O'Connell (Vice Chair), Laura Segura Gutierrez (Hon Secretary), John Conroy (Treasurer)

Olivia Rogers, Rónán O'Brien, Finbarr Murray, Helen Shaw, Terri Morrissey, Sinead Mercier, Phil Doyle

We recommend that this survey be consulted, particularly its accompanying ArcGIS map, to inform development planning such as the subject proposal and ensure that proposed mitigation measures sufficiently avoid adverse impacts upon these important woodland areas. Such areas are a crucial repository of natural and cultural heritage, as well as containing an abundance of ecosystem services and high biodiversity value.

We attach a screenshot of the native woodland stretch of the Cavestown woods for reference:



ArcGIS National Survey of Native Woodlands 2003-2008²

Similarly, the Ancient and Long-Established Woodland Inventory 2010³ was conducted by the NPWS to develop a protocol for the identification of ancient woodland, a valuable biological and cultural resource which is under severe threat in Ireland. These woodlands refer to woods with a continuous history of cover since before the period when planting and afforestation become common practice (mid-1600s).

Therefore, we submit that this inventory is consulted when assessing development applications such as the subject proposal, to ensure the mitigation of adverse impacts upon these ancient and long-established woodland sites. We bring the Board's attention to the ArcGIS map accompanying this ancient woodland inventory which can serve as a useful tool within the development consent process.

We also attach a snapshot of the stretch of ancient woodland contained within the Cavestown woods which is close to the subject site area:

² <https://dahg.maps.arcgis.com/apps/webappviewer/index.html?appid=24b1508d044e4d3d80bf107f70f33ee9>

³ <https://www.npws.ie/sites/default/files/publications/pdf/IWM46.pdf>



ArcGIS Ancient and Long Established Woodland Inventory 2010⁴

Proximity to SAC/pNHA

We note that the proposal is adjacent to the River Boyne and River Blackwater SAC (site code: 002299), and submit that the NIS be carefully assessed to ensure the sufficiency of proposed mitigation measures. It should be ensured that the requirements of Article 6(3) of the Directive with regard to the direct, indirect and cumulative impacts of the proposed development are satisfied, particularly with regard to the protection of water quality.

Additionally, we note that the Biodiversity chapter of the EIAR seems to omit consideration of the Lough Shesk pNHA (site code: 000556) by concluding that *"The Proposed Development is not located within or adjacent to any nationally designated site (NHA or pNHA). Therefore, construction works will not directly impact on any of these sites designated for nature conservation."* The pNHA is in very close proximity to subject site and appears to adjoin the wider landholding. We recommend that any potential impacts to the pNHA be evaluated, any hydrological connections between the site and the pNHA be identified, and mitigation measures be introduced if needed.

Please acknowledge our submission and advise us of any decision made.

Is mise le meas,

Seán O'Callaghan

Planning Officer

An Taisce – The National Trust for Ireland

⁴ <https://dahg.maps.arcgis.com/apps/webappviewer/index.html?id=e6da11a2a9804664a428315bcd105260>