



Planning Ref: 2461711

05 February 2025

Planning Section  
Galway County Council

Dear Sir/Madam

**Re: 2461711 – The development will consist of the felling/removal of some 343 hectares of conifer plantation for the purposes of peatland restoration and the establishment of native woodland, and associated works IN the townlands of Doire an Chláir (Derryclare) and Cúil na Ceártan (Cloonacartan), Co. Galway**

Introduction Comment

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council has given careful consideration to this planning application, as well as the reasons for refusal in the previous application [Ref 2360]. In doing so, the Heritage Council are cognisant of several factors that ought to be to the fore in assessing the application. These are:

- The principle of large-scale nature restoration projects, given the Nature Restoration Law, and the forthcoming National Nature Restoration Plan, and the associated national targets that Ireland will need to meet.
- The location of restoration projects, given that it is highly likely, that the initial restoration goals will be based in, and/or proximate, to Special Areas of Conservation (SAC), and Special Protection Areas (SPA).
- The novel nature of ecological restoration projects in Ireland, and the inherent trial and test nature of scientific restoration ecology.
- The interaction of the restoration project with the existing receiving environment, particularly in relation to the qualifying interests of the relevant SPAs and SACs.
- The requirement placed on competent authorities through their planning function by Article 6 of the Habitats Directive and the need to comply with county

**Baill na Comhairle | Council Members**

Martina Moloney (Cathaoirleach | Chairperson),  
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,  
Deirdre McDermott, Dr. Patricia O Hare, John G.  
Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

Charity reg. no 20036867

Aras na hOidhreachta, Lana an Teampaill,  
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,  
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E [mail@heritagecouncil.ie](mailto:mail@heritagecouncil.ie)

[www.heritagecouncil.ie](http://www.heritagecouncil.ie)



development plan policies on the protection of SPAs and SACs through Appropriate Assessment.

- The interaction of the restoration measures with the mitigation measures in terms of a trail and tested method.

#### Principle of ecological restoration

Bearing in mind the above, the Heritage Council support the principle of this application. The nature conservation and restoration requirements placed on the state at European level; national policy via the Climate Action Plan 2024, and the National Biodiversity Action Plan 2024, as well as national, regional and county development plan policies, necessitates the support of such projects.

The ambition is to restore habitats which include Blanket Bog/Wet Heath and Native Woodland by removing a commercial forestry plantation land use. The principle of ecological restoration of degraded landscapes and habitats is supported by the Heritage Council. The Heritage Council also believe there is an imperative to ensure that the initial nature restoration projects, particularly those on state lands, are assessed and managed in a manner that an established and robust precedent is set. This involves balanced and informed decision-making by local authorities through their planning function while ensuring that international, national and local county development plan policy is complied with.

The First Draft of the Revised NPF 2024 has been published. Whilst not yet adopted, it highlights to intention of national policy. The principle of ecological restoration of blanket bog and woodland habitats, as evident in this proposal, we believe, contributes to the following two National Strategic Outcomes:

- 7. *Enhanced Amenities and Heritage*
- 8. *Transition to a carbon neutral and climate resilient society*

In addition, *Section 9.3 - Protecting Conserving and Enhancing our Natural and Cultural Capital* of the Revised NPF, amplifies the importance of 'strategic planning for biodiversity' and the 'nature restoration law'. Whilst the Nature Restoration Plan is yet to be published there is an expectation, through Policy Objective 84, that *local authorities will aid its implementation, based on the 'best available scientific information'*. Furthermore, the retention of existing carbon sinks (peatlands) and facilitating forest growth should be seen as key climate mitigation strategies in national policy.

At regional level, Policy RPO 5.5. in the Regional Spatial and Economic Strategy for the Northern and Western Region, seeks to *"ensure efficient and sustainable use of all our natural resources, including inland waterways, peatlands, and forests in a manner which ensures a healthy society and a clean environment"*. While RPO 5.22 seeks to *protect*

#### **Baill na Comhairle | Council Members**

Martina Moloney (Cathaoirleach | Chairperson),  
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,  
Deirdre McDermott, Dr. Patricia O Hare, John G.  
Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,  
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,  
Kilkenny, Ireland, R95 X264

**T** 056 777 0777 | **E** mail@heritagecouncil.ie

**www.heritagecouncil.ie**



*and conserve our designated peatlands and bogs for reasons of biodiversity, ecosystem services, carbon sinks, areas of habitat importance, amenity and landscape value.*

There are also policies in the Galway County Development Plan 2022-2028, particularly CC 1, CC 2, and CC5 which support climate action ambitions. While Policy Objective NHB 6 “*supports the implementation of any relevant recommendations contained in the National Heritage Plan 2030, the National Biodiversity Plan, the All Ireland Pollinator Plan and the National Peatlands Strategy*”, whilst Policy Objective P2 and Policy Objective TWHS 2 aspires to “*Best Practice in Peatland conservation and management*”; and the “*Planting of Trees and Woodlands*”, respectively.

Bearing in the mind the above policies and the supporting principle of ecological restoration, The Heritage Council are of the opinion that only exceptional reasons, which must be well substantiated, provide justification to not support such applications. It is through this prism that the Heritage Council has reviewed this application.

#### Location of restoration projects and proximity to European/nationally designated sites

The history of the site has highlighted the significant damage that economically driven conifer (primarily Sitka Spruce) plantations caused in blanket bog habitats such as those in Doire an Chláir (Derryclare). In hindsight, the biodiversity and carbon storage capacities of this habitat type was poorly understood. However, recent knowledge has identified the importance of such habitats, and given the predominance of such habitats in Ireland, there is an urgent need to pursue the rehabilitation of blanket bogs, particularly in locations such as this. The removal of large areas of conifer plantation, and the raising of the water table, would prevent further peat degradation, while the native woodland proposals would help recover our native broadleaved forest resource, which is at unsustainably low levels in land use terms. This will allow the expansion of habitats not just on the site, but also in the immediate surrounding area of Doire an Chláir (Derryclare), where ancient or long-established woodlands, and peatlands, already exist.

There are numerous sites throughout the country particularly in upland environments, where conifer plantation has been developed in similarly important wet heath and blanket bog habitats. In addition, such plantations, and assumedly many potential sites for future ecological restoration projects, are also located adjacent or near existing nature conservation designations i.e. SACs and SPAs.

Chapter 3 of the EIAR has detailed the alternatives for development. For the reasons set out above, the ‘do nothing scenario’ is not tenable. In terms of site selection, the Heritage Council have reviewed the five shortlisted sites that Coillte Teoranta have considered. Whilst we are unable to comment on the site-specific geotechnical and hydrological constraints, we do note that all five sites are located adjacent, or in proximity, to SACs and/or SPAs. Therefore, from an environmental constraints analysis, the Heritage Council are not able to question site selection based solely on proximity to EU designated sites.

#### **Baill na Comhairle | Council Members**

Martina Moloney (Cathaoirleach | Chairperson),  
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,  
Deirdre McDermott, Dr. Patricia O Hare, John G.  
Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,  
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,  
Kilkenny, Ireland, R95 X264

**T** 056 777 0777 | **E** [mail@heritagecouncil.ie](mailto:mail@heritagecouncil.ie)

[www.heritagecouncil.ie](http://www.heritagecouncil.ie)



However, the Heritage Council is concerned that there may be a conflict between future nature restoration aspirations and the protection of existing nature conservation sites, and that this needs to be fully addressed at the strategic level, and in decision making. The “*Regulation of the European Parliament and the Council and amending regulation (EU) 2022/689*” and the targets set within, are based on the Annex 1 habitats of the EU Habitats Directive, and therefore it is highly likely that many of the restoration projects will be in, or in the vicinity, of SACs and SPAs. Indeed, the five sites discussed in the alternatives meet this criterion. Therefore, there is concern that there is an intra-biodiversity land use conflict arising, which may compromise the feasibility of the National Nature Restoration Plan.

It is important to note at this point, that the Heritage Council **do not** believe that ecological restoration projects that seek to rehabilitate one set habitats should be pursued if they damage proximate existing European level designated habitats. The revised National Planning Framework, the NWRA Regional Spatial and Economic Strategy 2022-2028, and the Galway County Development 2022-2028, all have similarly robust policies for the protection of SACs and SPAs in order to comply with the Appropriate Assessment requirements of the Birds and Habitats Directives.

It is with this in mind that the main question to consider for the Heritage Council, when reviewing this application, is if the application has demonstrated to a reasonable level that there would be no significant impacts from the restoration project on the proximate SACs and SPAs. This is needed to ensure that the local authority can be satisfied that it meets its obligations under Article 6 of the Habitats Directive, and associated regulations, through Galway County Development Plan 2022-2028 policy objectives NHB 1, NHB 2, and NHB 3.

#### Balancing nature restoration with nature conservation.

It is important to state at this juncture that scientific ecological restoration is in many cases a new frontier in global ecology, and in many scenarios is inherently untried and untested, particularly at the level of each habitat, which relies on a closed and complicated web of biogeochemical and hydrological cycles, climate, and biological systems. Furthermore, the habitats identified for re-establishment/expansion comprise blanket bog and native woodland and may require significant timescales to replenish. Woodland is likely to take several 100 years to re-establish while blanket bog habitats, may take even longer to attain historic organic peat levels. Successful recovery is not guaranteed and this needs to be recognised.

Furthermore, it is important to note that the term “construction phase” should be understood flexibility in terms of a nature restoration project. Management will be required to usher the habitat in the desired direction regularly, which may involve long timescales, and interventions may regularly be required. Although, it should be noted that the initial drain blocking, surface smoothing and other methods can be completed in a relatively

#### **Baill na Comhairle | Council Members**

Martina Moloney (Cathaoirleach | Chairperson),  
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,  
Deirdre McDermott, Dr. Patricia O Hare, John G.  
Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,  
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,  
Kilkenny, Ireland, R95 X264

**T** 056 777 0777 | **E** mail@heritagecouncil.ie

**www.heritagecouncil.ie**



short period. It is the methods involved in the latter that are of key importance, and it should be possible to demonstrate trial and tested methods for this. There are advanced learnings on blanket bog restoration from countries such as Scotland, which has been highlighted in the information supplied with the application; with evidence from Ireland (including Peatland Restoration in Mayo) also growing, albeit over smaller areas.

The Heritage Council recognise that in general terms ecological restoration lacks complete certainty. At the same time, this should not give licence to applicants for restoration projects to pilot completely unreasonable untested methods that could have an impact on internationally important habitats such as those present in the environs of Doire an Chláir (Derryclare).

#### The proposal and assessment of impact on European sites

A review of the Natura Impact Statement (NIS) and the Environmental Impact Assessment Report (EIAR), has identified three European designated sites that need to be carefully considered:

- *The Twelve Bens/ Garraun Complex SAC*
- *Connemara Bog Complex SAC*
- *Connemara Bog Complex SPA.*

There are several habitats and species (qualifying interests) that have been screened into the Appropriate Assessment for each of the designations. This includes four bird species in the context of the Connemara Bog Complex SPA. Indeed, this general area of Connemara does have suitable habitat red and amber listed ground nesting birds. An assessment of direct and indirect impacts has been considered as part of the NIS and EIAR. The latter has included wider ecological matters outside the Natura 2000 sites listed above, although our comments are primarily confined to the SACs and the SPA.

The primary reason for refusal [Ref: 2360] related to the uncertainty of the methods/mitigation measures and the potential negative impacts on the named European designations. It was considered that the lack of an untried and tested method would potentially put at risk the integrity of both SACs. Whilst it is questionable whether it is reasonable to suggest that the proposal could possibly have addressed the contention that the method was untried and untested in '*the unique environment of Derryclare*' given that the site itself is varied topographically; what is reasonable, is that, in general terms, the restoration methods and associated mitigation measures, particularly the mitigation with regards to pollution and nutrient enrichment of the water environment, should have a level of certainty to satisfy the Habitats Directive.

It also appears that there were concerns regarding peat stability, and this is alluded to in the EIAR submitted. Therefore, we assume there was also concern regarding a pathway for peat movement or landslide to potentially damage the qualifying interests of the SACs.

#### **Baill na Comhairle | Council Members**

Martina Moloney (Cathaoirleach | Chairperson),  
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,  
Deirdre McDermott, Dr. Patricia O Hare, John G.  
Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,  
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,  
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E [mail@heritagecouncil.ie](mailto:mail@heritagecouncil.ie)



The Heritage Council are not in a position to comment on the geotechnical information provided in Chapter 7 of the EIAR, except to note the conclusion that “*the risk of a landslide at the project site is determined to be negligible/none*”. Accordingly, we assume the risk, specifically regarding peat instability, to the proximate SACs from the restoration works is also negligible/none. We therefore confine our comments to Chapter 6 of the EIAR and the Natura Impact Statement and associated appendices, with respect to the main works proposed, which, in broad terms, are:

- The felling of forestry plantation in 20 harvest blocks over a phased period
- Restoration which involves:
  - drain blocking and infilling, as well as surface smoothing in terms of blanket bog and wet heath,
  - and sapling planting in terms of native woodland restoration, with deer proof fencing also provided
- Forest access roads and new water crossing bridges.

### Clear Felling

The Heritage Council have no objection to the removal of the forestry plantation. In addition, large areas of this site have already been felled, and assumably any felling would fall under the Forestry Act/ licencing regardless of this planning application and therefore continue. Therefore, of key interest is the interface between the felling and the commencement of the restoration measures.

### Restoration measures and enhancement/ water crossings

At this stage there is a need to emphasise that the assessment of measures and associated mitigation should be considered in terms of the potential impacts the restoration project may have on the SACs and SPAs, and not on whether the restoration project itself is successful in terms of target vegetation communities etc, which as noted, may take some time to establish. Although we do recognise that the deer proof fencing is essential to enable the woodland restoration element to progress and have no objection to this element of the proposal.

In broad terms the restoration measures will involve draining filling/blocking, surface smoothing, and associated works regarding brash management etc. It is clear, and understandable, that the options for restoration depend highly on site-specific circumstances, with the drainage mapping ultimately being the determining factor for which methods are needed to raise the water table. The Heritage Council note the discussion regarding pre-clearance and post-clearance drainage mapping, and the tree removal plan as provided in Appendix 6. This results in 21 restoration options based on various scenarios of peat depth etc, with corresponding risk factors.

#### Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),  
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,  
Deirdre McDermott, Dr. Patricia O Hare, John G.  
Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,  
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,  
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E [mail@heritagecouncil.ie](mailto:mail@heritagecouncil.ie)

[www.heritagecouncil.ie](http://www.heritagecouncil.ie)



There appears to be no significant impacts regarding the Blanket Bog Habitat and Rhynosporian Depressions on the site itself, although there is a possibility that there may be disturbance to Merlin, and possibly red squirrel.

The restoration project envelops the Derryclare Nature Reserve, which includes the Annex I habitat - *Old sessile oak woods with Ilex and Blechnum in the British isles*, which is described as rare in Connemara in the site synopsis. The NIS has determined that this qualifying interest of the Twelve Bens/ Garraun Complex SAC has no complete source-pathway-receptor chain for any effect on this habitat and therefore was not considered further. The EIAR report on biodiversity does note that the native (scrub) woodland envisaged for Area D will have positive effects and this will have an overall positive effect on native woodland habitats within the site. Although it is likely that several successional stages, commencing with pioneering birch and willow species, are needed before the vegetation community necessary to qualify as sessile oak woods is established.

However, given the described need to carefully manage the invasive species on site, particularly *Rhododendron ponticum*, which has been described in Appendix 4.4 as “one of the largest threats to the success of the restoration works”, there is a possibility of impact. The management and control of *Rhododendron*, particularly the need to prevent reseeding, is essential in terms of the integrity of the proximate Sessile Oak woods of Doire an Chláir (Derryclare). To ensure that there is no unintentional impact on the woodland, the Heritage Council suggest that there may be a pathway of effect to the woodland, and this needs to be clarified. Whilst there is an invasive species management plan for the success of the restoration project itself, there is a need to ensure that the works to manage invasive species on site do not impact on the existing nearby habitats. This needs to be discussed in the context of the assessment of impacts. There is also an assumption implicit that the raising of the water table has no potential impact on this QI of the SAC, however this also needs to be confirmed in both the NIS and EIAR.

Of particular concern are the aquatic based considerations, whereby the existing local water environment can, in general terms, be considered of good-high quality. The qualifying interests of each European site, that are reliant on a good water quality environment are:

- *Salmon Salmo salar* (both SACs)
- *Otter Lutra lutra* (both SACs)
- *Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae)* (both SACS)
- *Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetetea* (Connemara Bog Complex SAC)
- *Natural dystrophic lakes and ponds* (Connemara Bog Complex SAC)
- *Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation* (Connemara Bog Complex SAC)
- *Slender Naiad Najas flexilis* (Connemara Bog Complex SAC)

#### Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),  
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,  
Deirdre McDermott, Dr. Patricia O Hare, John G.  
Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,  
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,  
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E [mail@heritagecouncil.ie](mailto:mail@heritagecouncil.ie)

[www.heritagecouncil.ie](http://www.heritagecouncil.ie)



We would note however, that some bird species require good water quality also, and the qualifying interest (Cormorant) of the Connemara Bog Complex SPA should be included here.

In the absence of suitable mitigation, there is undoubted potential significant impacts on the water environment from the proposed works. This may manifest in terms of habitat deterioration with regards to over enrichment of oligotrophic to mesotrophic waters, particularly because of increased turbidity and pollution; the associated impact on salmon in terms of foraging/ spawning habitat; as well as indirect impacts on otter and cormorant in terms of potential prey biomass reductions. For the Heritage Council this is a key consideration particularly with regards to:

- Pollutants and nutrient release
- Suspended sediments entering the water environment

The Planning Report, and NIS, the EIAR and the CEMP have detailed comprehensive mitigation measures. The mitigation measures in the previous application caused uncertainty, and therefore the assertion that the method was untried and untested. We have reviewed the mitigation measures, which have been described in detailed in Section 6.2.1.3 of the NIS. However, to fully understand the mitigation measures there is a need to account for the methods of bog restoration.

Appendix 6 of the NIS provided a comprehensive document on Forest to Bog restoration. The phasing plan of the restoration has identified each area, as well as the restoration options for that area. This is done by sub-catchment and details the required buffering to EPA watercourses, the location of silt traps etc. When considered alongside the mitigation measures the Heritage Council have the following observations.

The mitigation measures described in the context of potential water quality deterioration appear skewed towards the tree felling and watercrossing elements of the proposal. Whilst necessary, a greater account could be given to the restoration mechanisms in broad terms i.e. surface smoothing, drain blocking and if more specific mitigation is expected or needed for this. Whilst it is stated, that during the operational phase that *“the blocking of drains will reduce hydrological connectivity from the Proposed Project site to the Twelve Bens/Garraun Complex SAC, further reducing the potential for runoff of pollutants into the SAC”*, there is need to satisfy the competent authorities that the activity of drain blocking and management itself has been accounted for in the mitigation measures. Whilst this may be inherent in the ‘mitigation by avoidance and design’, it would be helpful to confirm this.

It is not clear if the drainage mapping will be completed before felling or after. The possibility of both is discussed in Appendix 6 of the NIS. Given that this will determine and refine the restoration options, there is a need to have a contingency post-permission. In this regard, we believe that a condition be applied for reporting, which should be specifically based on post felling drainage mapping, with the intention to confirm that the methods, and most importantly the risk to the aquatic environment has not changed.

#### Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),  
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,  
Deirdre McDermott, Dr. Patricia O Hare, John G.  
Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,  
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,  
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E [mail@heritagecouncil.ie](mailto:mail@heritagecouncil.ie)

[www.heritagecouncil.ie](http://www.heritagecouncil.ie)



The coupe size and the longer time horizon of the project, we believe are particularly important methods. The harvest and restoration plan timelines are assumedly related given that there is a need to raise the water table as soon as possible after felling. Accordingly, the Heritage Council believe that a condition that requires stringent reporting on Phase 1 of the Restoration Plan, in terms of any risk to the environment be provided before the subsequent phases commence.

A peatland scientist with specific knowledge and expertise should be retained on site, as suggested by the NIS. However, we believe it necessary that the ecologist should be a peatland restoration specialist. In addition, we have noted the MOU that was signed with the NPWS, and we believe their knowledge is essential, and would defer to their expertise.

### Recommendations

It is undoubted that the project would certainly have benefited from a smaller scale test case; and notwithstanding our comments on the nature of restoration ecology, the Heritage Council understand the concern that such a novel endeavour would have for the competent authority in relation to fulfilling the obligations of the Birds and Habitats Directive. However, as alluded to earlier in this submission, in terms of ecological restoration, there will be a level of uncertainty regardless, and the Heritage Council are hesitant to suggest that this is unacceptable at this moment in time.

Therefore, while giving qualified support to this application, we seek to ensure the following conditions are applied, and that further information is needed on some matters, in the specific interests of the ecological integrity of the proximate SACs and SPA:

### **Further Information**

1. The reassessment of the NIS to include *Old sessile oak woods with Ilex and Blechnum* [91A0] as part of The Twelve Bens/ Garraun Complex SAC; and if no pathway remains, this needs to be justified specifically in relation to invasive species management and the drainage management proposals for bog rehabilitation.
2. Greater discussion of the restoration mechanisms in broad terms i.e. surface smoothing, drain blocking in terms of the assessment of construction phase impacts, and associated mitigation measures.

### **Conditions**

3. That the mitigation measures identified in the NIS and EIAR are conditioned as part of the permission. And that the applicant works with the National Parks and Wildlife Service, and retain an onsite peatland ecologist, with experience in peatland restoration, for the duration of the project.

#### **Baill na Comhairle | Council Members**

Martina Moloney (Cathaoirleach | Chairperson),  
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,  
Deirdre McDermott, Dr. Patricia O Hare, John G.  
Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,  
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,  
Kilkenny, Ireland, R95 X264

**T** 056 777 0777 | **E** mail@heritagecouncil.ie

**www.heritagecouncil.ie**



4. A condition that requires reporting on post felling drainage mapping that obliges/conditions the applicant to inform and amend restoration options accordingly. This should include an assessment of the potential impacts on the water environment and if any such assumptions/impacts have changed following the drainage mapping, and therefore the restoration mechanism as currently proposed. This is needed before commencing works and should be provided to the local authority following the drainage mapping.
5. That the Restoration Phasing plan (by defined sub-catchment) as proposed be established by condition as the best means to achieve a tested method in this environment. A report on the first phase of the plan is required, within a defined timescale, before the approaches used are replicated across the entire site. There should be a mechanism of reporting that requires the initial phase to inform the feasibility of the next phases of the restoration plan. This should concentrate particularly on the impacts from the first phase, if any, on the ecological environment; any new unforeseen risks, and/or changes to project assumptions.
6. Condition requiring compliance with the mitigation measures with regards to access roads and forests, in terms silt fencing, buffer zones, ecological monitoring.
7. Agreement with the NPWS on the method of Rhododendron removal and monitoring over the lifetime of the restoration plan.

### Conclusion

The Heritage Council believe it critical that nature restoration is supported, to meet international, national and local policy obligations. In broad terms we support this application and believe it complies with national policy. We would however recommend that Galway County Council carefully consider our recommended conditions and further information requests, which we believe are necessary to alleviate concerns for potential impacts on the proximate SACs and SPA; as well as to maximise the learnings from this restoration endeavour in order to inform future restoration projects.

Yours sincerely

---

Virginia Teehan

Chief Executive Officer

### **Baill na Comhairle | Council Members**

Martina Moloney (Cathaoirleach | Chairperson),  
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,  
Deirdre McDermott, Dr. Patricia O Hare, John G.  
Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,  
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,  
Kilkenny, Ireland, R95 X264

**T** 056 777 0777 | **E** [mail@heritagecouncil.ie](mailto:mail@heritagecouncil.ie)

[www.heritagecouncil.ie](http://www.heritagecouncil.ie)