

Planning Cover Report

Derryclare Wild Western Wetlands Project



DOCUMENT DETAILS

Client:

Coillte Teoranta

Project Title:

Derryclare Wild Western Wetlands

Project

Project Number:

210603

Document Title:

Planning Cover Report

Document File

210603 - PR - F2 - 2023.02.17

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Rev	Status	Date	Author(s)	Ar proved By
01	Draft	05/01/2023	AG	OMcC
02	Draft	11/01/2023	AG/OMcC	PH
03	Draft - client review	10/02/2023	AG/OMcC	PH
F	Final – client review	15/02/2023	AG/OMcC	PH
F1	Final – client review	16/02/2023	AG/OMcC	PH
F2	Final	17/02/2023	AG/OMcC	PH



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1.1

1.2

1.3

INTRODUCTION

Preamble

This Planning Report has been prepared by MKO on behalf of the applicant, Coillte Teoranta, who intend to apply to Galway County Council (GCC) for planning permission to remove approximately 343 hectares (ha) of coniferous forestry plantation for the purposes of peatland restoration in the townlands of Derryclare and Cloonnacartan in Co. Galway.

The purpose of this Planning Report is to outline the background to the development, the key elements of the proposal, to demonstrate that the development complies with all relevant development plan provisions and is in accordance with the proper planning and sustainable development of the area. This Planning Report is intended to assist the Planning Authority with the assessment of the application by providing a summary of the content and context of the overall proposal.

The Project Team

The applicant, Coillte Teoranta, has appointed MKO Planning and Environmental Consultants, in association with the following consultants to apply to Galway County Council for permission for the proposed development as outlined above and described in detail in Section 3 of this Report.

- > MKO Planning and Environmental Consultants
- Hydro Environmental Services Ltd, Dungarvan, Co. Waterford.
- Tobar Archaeological Services, Middleton, Co. Cork.
- Alan Lipscombe Traffic and Transport Consultants
- > Fehily Timoney and Company

Report Structure

Section 1	Outlines the preamble, the project team, and the Report Structure.
Section 2	Outlines the Rationale for the proposed project.
Section 3	Provides an overview of the engagement with relevant stakeholders and pre- planning consultation with Galway County Council.
Section 4	Provides and overview of the site's context and descriptions (100)

Section 5 Provides the planning history related to the site and the sites vicinity.

Section 6 Provides a detailed assessment of the proposed development.

Section 7 Provides an overview of the relevant European, National, Regional, and Local planning policy framework.



Section 8 Draws out and summarises the key features of the proposed development, in addition to providing a concluding statement on the proposed schemes contribution to the proper planning and development of the area.

Section 9 Conclusion.





RATIONALE FOR THE PROPOSED PROJECT

The proposed Derryclare Wild Western Peatland Project is part of Coillte Nature's ongoing Wild Western Peatlands Project. The objective of the Wild Western Peatlands Project is to restore and rehabilitate approximately 2,100ha of Atlantic blanket bog and wet heath along the western seaboard of Ireland - that is currently planted with poorly performing inappropriate spruce and pine forests - to enhance biodiversity and improve carbon storage in the landscape. The area was planted to create rural employment at a time when the importance of peatlands was not well understood. The project presents an opportunity to retore a very rare and unique area of biodiversity.

Peatland restoration is one of the primary nature-based solution to the biodiversity and climate crisis in Ireland, as blanket bogs accumulate and store carbon as well as possessing unique habitats with high biodiversity value. These peatlands also store and filter water, playing a vital role in the management of water catchments. Careful management of these areas is therefore crucial for climate action.

The Wild Western Peatlands Project has been informed by precedent bog restoration projects in Ireland, Northern Ireland and Scotland. The Coillte Nature team have engaged in knowledge-sharing visits to key sites in these areas.



Figure 1: Precedent Bog Restoration site at Gowmoss, Scotland.

Site Selection

2.1

Five different Coillte sites were shortlisted during the consultation process. These sites are identified in Figure 2 below and in Appendix 1 of this report.







Figure 2: Wild Western Peatlands Project Shortlisted Sites (Source: Stakeholder Information Document)

These sites were shortlisted taking the following criteria into account:

- Representative of various challenges related to redesigning western peatland forests.
- Proximity and hydrological connection to SACs with blanket bog and wet heath habitats.
- Opportunity to partner with a range of key stakeholders.
- Sites that are representative of typical Coillte western peatland to ests with a moraic of unplanted and afforested areas.
- Sites are of low timber production value with the majority of conifers growing at Yield Class 12 or below.

 GALWAY COUNTY COUNTY

The subject site at Derryclare has been chosen as the pilot site for the Wild Western Peatlands project. In addition to the pilot site, further Coillte sites will be selected to make up the 2,100 hectares of the total Wild Western Peatlands project in the coming years (Figure 2).

Derryclare Site

2.2

The site at Derryclare is a pilot site, as outlined in the information document issued to stakeholders by Coillte Nature. The forest at this area is highly visible from the surrounding area, and when it was planted over 50 years ago there was little consideration given to landscape design. This iconic site contains areas of high biodiversity value and therefore offers great potential for redesign and restoration.



The project also presents an opportunity to establish recreational and eco-tourism for use by members of the local and wider community alike. The Derryclare area is a key tourist and angling destination and is close to the Wild Atlantic Way and the Western Way. The establishment of native woodlands, in combination with rehabilitated peatland and wetland areas will be attractive to locals and visitors to the area because of its wildlife, history and variety of landscapes. This will provide a long-term benefit to both the local community and visitors to the area. Coillte operates an open forest policy that encourages the use of Coillte Forests for recreation.

If the proposed project were not to proceed, the current land-use, i.e. plantation conifer forestry, at the site would continue. The opportunity to restore and rehabilitate the site to blanket bog and wet heath would be lost, along with the opportunity to better align the landscape of the Proposed Development Site with the surrounding moorland landscape character. The completion of this project would enhance biodiversity on the site and improve the carbon/greenhouse gas (GHG) storage in the landscape, as well as methane in the longer term.





STAKEHOLDER ENGAGEMENT

Stakeholder Consultation & Site Visit 3.1

Online Stakeholder Event 3.1.1

Initial stakeholder engagement for the project was held through an online stakeholder consultation event in June 2021. 40+ attendees participated in the consultation who represented environmental NGOs, regulatory bodies, government agencies, community networks and local businesses.

A Stakeholder Information Document was provided by Coillte Nature (Appendix 1). This document provided information about the rationale for the project, its scale, timeframes, and the different sites considered in the selection process. Follow-on discussions on various aspects of management plan were carried out with a range of stakeholders and fed into the development of the management plan.

The key findings and feedback from the online stakeholder event are summarised in Appendix 2 of this report.

Stakeholder Site Visits 3.1.2

A stakeholder site visit was held on 1st June 2022 to discuss management the proposed management plan. This site visit was primarily attended by local business owners.

A second site visit was held on 17th June 2022. Key government stakeholders in attendance at this site visit included the Forest Service, NPWS and Inland Fisheries Ireland.

November 2022 Update 3.1.3

A stakeholder update was issued by Coillte Nature in November 2022, setting out a summary of the engagement held to date. The update provides details of the rationale for the project. an overview of the pilot site at Derryclare, a timeline of the key project milestones to State of summary of the stakeholder feedback, and an overview of the proposed management plan as discussed at the stakeholder site visits. The stakeholder update document is included in 60 Appendix 3 of this report.

Pre-Planning Consultation with Galwayn County

3.2 Council

An onsite pre-application consultation meeting was convened with senior members of Galway County Council on the 4th October 2022. Attendees included:

- Michael Owens Director of Services (Planning) Galway County Council
- Alan O'Connell Senior Planner Galway County Council
- Ciaran Wynne Senior Executive Engineer Galway County Council



- Dr Ciarán Fallon -Director, Coillte
- Karen Woods Operations Manager, Coillte Nature
- Dr Declan Little Ecological Lead, Coillte Nature
- Dr Dermot Tiernan Land Solutions, Coillte Nature
- · Hedda Dick-Outreach, Coillte Nature
- · Thomas Blackwell Senior Environmental Scientist, MKO
- Pamela Harty Senior Planner, MKO

The site visit included a guided tour around the site, with technical input provided by Coillte's forestry and ecology specialists. The key items discussed included:

- Background to the project and the reasons the subject site at Derryclare has been chosen as the pilot site for the Wild Western Peatlands project.
- The benefits of restoring and rehabilitating significant areas of Atlantic blanket bog
 and wet heath that is currently planted with poorly performing inappropriate spruce
 and pine forests to enhance biodiversity and improve GHG/carbon storage in the
 landscape.
- Measures to protect the surrounding Natura sites;
- The need for flexibility to determine which method of drain blocking is appropriate for different areas of the site.
- An update on the ongoing stakeholder and community engagement process.





SITE LOCATION AND CONTEXT

Site Description 4.1

The subject site at Derryclare lies to the west of Lough Inagh and Derryclare Lough in Connemara, Co. Galway, north of the Galway to Clifden Road (N59). The Derryclare property extends to approximately 567 Hectares (ha) and ranges in elevation from 10-180m, lying on the western slopes of Derryclare and Bencorr mountains. Figure 3 below presents a map of the site location.



The site topography ranges between 180m above ordnance datum (m AOD) at its highest point to approximately 10m at its lowest point. The current land-use in Derryclare is COUNTY council, dominated by forest cover which was planted primarily in the 1960s following interests property is unplanted blanker beautiful and the stabilish conifer plantation of t felled or burnt and not replanted and is restoring to wet heath or blanket bog, and the remaining 76% is under forest cover. Approximately 43% of the forest area is in its second



rotation, having been felled and replanted over the last 20 years, with the remaining 47% in its first rotation planted in the 1960s. Approximately 95% of the existing forest cover is comprised of conifer species, primarily Lodgepole pine and Sitka spruce. It is estimated that 84% of the forest cover is yield class (YC) 12 or less, below the threshold for commercial forest production (YC14+), with 55% at YC 8 or below.

The main habitats in the Derryclare catchment are wet heath and blanket bog where the vegetation is dominated by purple moor-grass (Molinia caerulea) with deer-grass (Trichophorum cespitosum), tormentil (Pontentilla erecta), ling (Calluna vulgaris) and crossleaved heath (Erica tetralix). An oak-dominated woodland adjoins the south-east of the Coillte property.

The area is a key tourist and angling destination and is close to the Wild Atlantic Way and the Western Way. The existing forest is highly visible from the surrounding area and little consideration was given to landscape design during the time of the original planting in the 1960s. To the southeast of the Coillte property lies an old (possibly ancient), oak-dominated woodland, designated in 1980 as Derryclare Nature Reserve (S.I. 177/1980; 19ha in size) and it is owned and managed by the National Parks and Wildlife Service (NPWS). The Nature Reserve is enclosed to the east by Derryclare Lough and conifer plantations to the west, and currently has no opportunity to extend its boundaries as it would naturally do.

Surface water within the northern portion of the site drain in an easterly or north-easterly direction to Lough Inagh. The remainder of the site drains to Derryclare Lake. There is an extensive network of artificial drains within the project site that will be blocked as part of the proposed peatland restoration. A detailed description of the site hydrology and hydrogeology is provided in Chapter 7 of the EIAR.

Ecology 4.1.1

There are 3 no. Special Areas of Conservation (SACs) within proximity of the site. These sites include:

- The Twelve Bens/Garraun Complex SAC
- Maumturk Mountains SAC
- Connemara Bog Complex SAC

The location of these sites is illustrated in Figure 4 below.





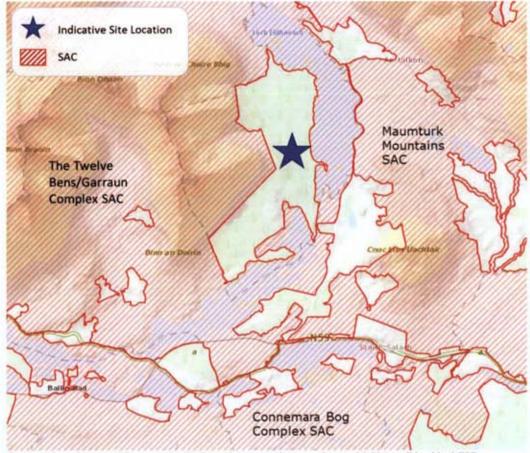


Figure 4: Special Areas of Conservation (SACs) in the surrounding area. Source: MyPlan.ie, Edited by MKO.

The Twelve Bens/garraun Complex SAC is located to the west of the site. The site synopsis from the National Parks & Wildlife Service is as follows:

"This is an extensive site situated in the north-west of Connemara in Co. Galway and dominated by mountainous terrain. The site is bounded to the south by the Connemara Bog Complex, to the east by the Maumturk Mountains and to the north by Killary Harbour. Included within the site are the Twelve Bens mountain range, the mountains to the north of Kylemore (Doughruagh, Garraun and Benchoona), rivers including the Ballynahinch and Owenglin systems and an area of coastal heath and machair near Glassilaun. The site also includes some extensive tracts of lowland blanket bog which are continuous with the mountains. Most of the mountain summits reach a height in excess of 500 m, the highest see SECTION

The Maumturk Mountains Special area of Conservation (SAC) is located to the east of the proposed development site. The site synopsis from the National Parks & Wildlife Service is as follows:

"The Maumturk Mountains are situated east of the Twelve Bens and west of the Alalam asnas between the Inagh Valley and the Leenaun/Maam road in Co. Galway To mountains exceed the mountains exceed to mountains exceed 600 m in height and about half of the land within the site lies above an altitude of 250 m. In addition many rivers criss-cross the site. The main bedrock is quartzite in the south, which forms impressive cliffs but little mineral soil, and shales and slates in the northern area, which weather more easily. Bands of metamorphosed limestone (Lakes Marble Formation) occur at Lissoughter, Maumeen Gap at Knocknagur and Maamturkmore."



The Connemara Bog Complex SAC is located to the south of the site. The site synopsis from the National Parks & Wildlife Service is as follows:

'The Connemara Bog Complex SAC is a large site encompassing the majority of the south Connemara lowlands in Co. Galway. The site is bounded to the north by the Galway-Clifden road and stretches as far east as the Moycullen-Spiddal road. The site supports a wide range of habitats, including extensive tracts of western blanket bog, which form the core interest, as well as areas of heath, fen, woodlands, lakes, rivers and coastal habitats.'

There is 1 no. Special Protection Area (SPA) located to the south of the site. This includes the Connemara Bog Complex SPA as indicated in **Figure 5** below.



Figure 5: Location of the Connemara Bog Complex SPA in the context of the subject site. Source: MyPlan.ie, Edited by MKO.

There are 3 no. proposed Natural Heritage Areas located in proximity of the site. These sites include:

- The Twelve Bens/Garraun Complex pNHA
- Maumturk Mountains pNHA
- Connemara Bog Complex pNHA

The location of these sites is illustrated in Figure 6 below.





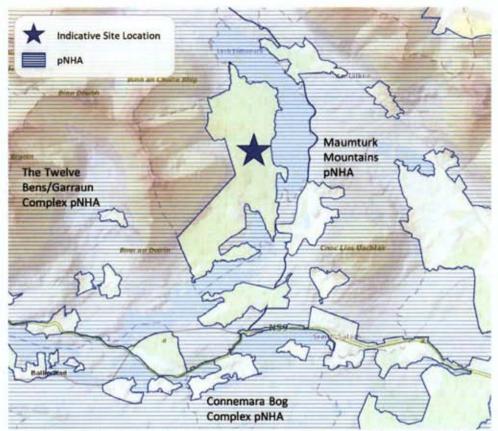


Figure 6: Proposed Natural Heritage Areas (pNHA) in the surrounding area. Source: MyPlan.ie, Edited by MKO.

4.1.2 Flooding

According to the Galway County Council Public Planning Viewer Map, the proposed development site is not included within the Galway County Councils Flood Zone A or Flood Zone B.





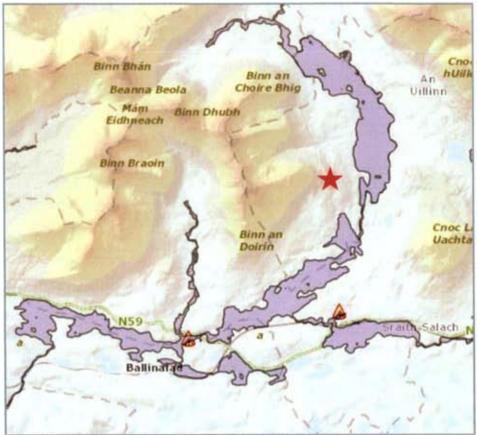


Figure 7: Flood Maps from Floodinfo.ie prepared by MKO. The site is identified with a red star.

Past flooding events have not been recorded within the site boundary, but there are 2 records of flooding to the southeast and southwest of the site. Figure 7 above shows the site, which is marked with a red star, is not in a flood zone area. The map also shows 2 past flooding events south of the site both of which were outside the red line boundary.

The proposed development will restore up to 281 hectares of peatland habitat, these peatlands store and filter water, playing a vital role in the management of water catchments.

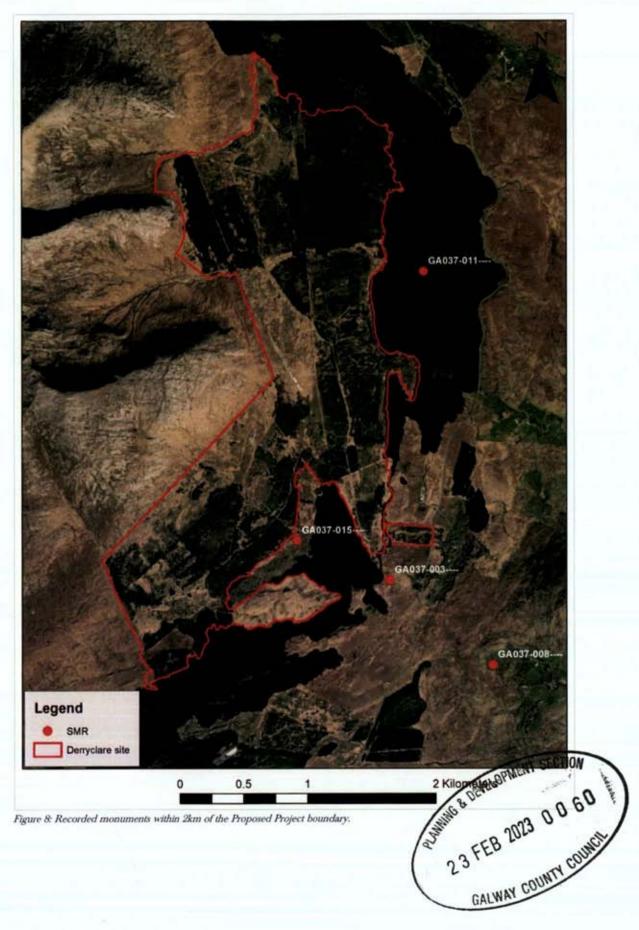
Cultural Heritage

The area of the proposed development has been explored in terms of any cultural heritage features. A number of National Monuments were identified in close proximity to proposed development site which is identified in Figure 8 and Table 1 below. There are no structures listed in the Record of Protected Structures (RPS) or National Inventory of Architectural

Heritage NIAH within the application site boundary.

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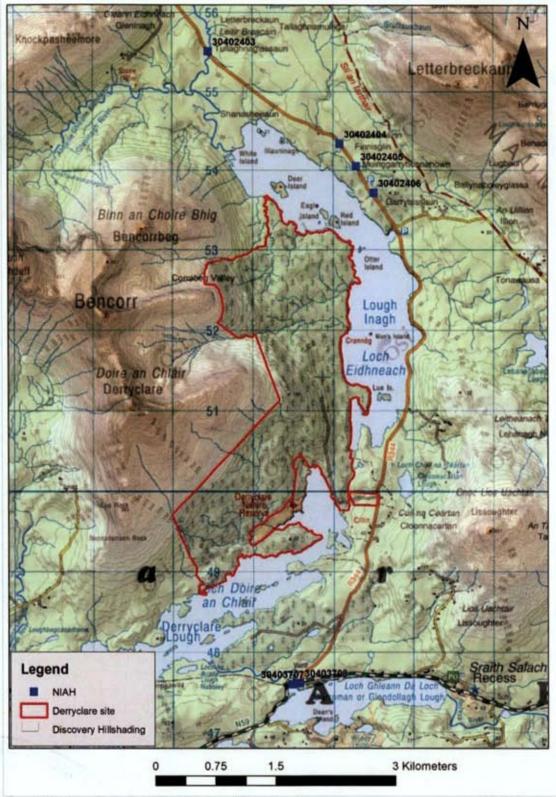
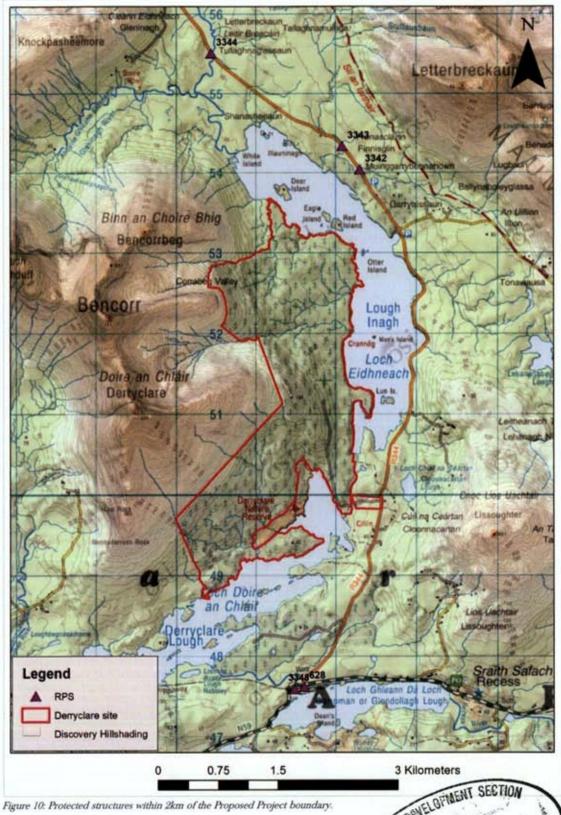


Figure 9: NIAH structures within 2km of the Proposed Project boundary.







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Table 1: Recorded monuments within 2km of the Proposed Project site boundary.

RMP NO.	ITM E	IIM N	CLASS	TOWNLAND	Distance to Proposed Project Boundary
GA037- 011—	484467	751979	Ringfort - cashel	LOUGH INAGH	306
GA037- 003—	484207	749577	Children's burial ground	CÚIL NA CEÁRTAN	218
GA037- 008—	485006	748917	Redundant record	LIOS UACHTAIR	1041
GA037- 015—	483481	749887	Metalworking site	DERRYCLARE	48

NIAH sites within proximity of the subject site as identified in Figure 9 are listed in Table 2 below.

Table 2: NIAH structures within 2km of the Proposed Project boundary.

NIAH REG.	ITM E	ITM N	Type/O riginal Use	Date	Townland	Distance to Proposed Project Boundary
30402406	484487	753741	hunting /fishing lodge	1870 - 1890	FINNISGLIN	679
30402405	484265	754078	bridge	1840 - 1860	FINNISGLIN	863
30402404	484056	754363	bridge	1840 - 1860	FINNISGLIN,LET TERBRECKAUN	1091
30403707	483449	747620	bridge	1890 - 1895	GARROMAN	1525
30403708	483547	747636	railway station	1890 - 1900	LISSOUGHTER	1567
30402403	482422	755535	bridge	1840 - 1860	GLENINAGH (MOYRUS),LETTE RBRECKAUN	1972

Protected structures within proximity of the subject site as identified in Figure 10 are listed in Table 3 below.

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Table 3: Protected structures within 2km of the Proposed Project boundary.

RPS REF.	ПМ Е	ITM N	TYPE	NIAH REF	Distance to Proposed Project Boundary
3342	484269	754067	Bridge	30402405	855
3343	484054	754361	Bridge	30402404	1088
3348	483447	747616	Railway bridge	30403707	1527
628	483576	747643	Railway station	30403708	1579
3344	482406	755536	Bridge	30402403	1979

414 Landscape and Character

Galway County Council have prepared a Landscape Character Assessment that is contained in Appendix 4 of the GCDP. This Landscape Character Assessment categorises Galway County into different Landscape Character Types (LCTs). The Proposed Development is located within the Uplands Bog Landscape LCT, as seen in Figure 11 below. This LCT is described as:

"A large area of very open landscape with dispersed settlements, roads and agriculture. The extensive areas of exposed rock, uplands and blanket bog are largely unenclosed. There are large areas of coniferous forestry plantation in a number of locations away from the coast. It has two principal components that are contained between a complex coastal mosaic of sea inlets to the west and south, and the long shore of Lough Corrib to the east. The first component is the steep-sided peaks of the 12 Bens that run west-east south of Killary Harbour and the other is a large lake-studded plain of blanket bogs. The overall landscape is valued on account of the scale of the open views within this unenclosed landscape. Another perceived value is the contrast between the uninterrupted and uninhabited plains. Open areas around bogs reveal extensive sky views and the area contains expanses of dark sky. The area is extensively used for hill-walking and recreational touring by coach, cars and cycles. It also contains the Connemara National Park."

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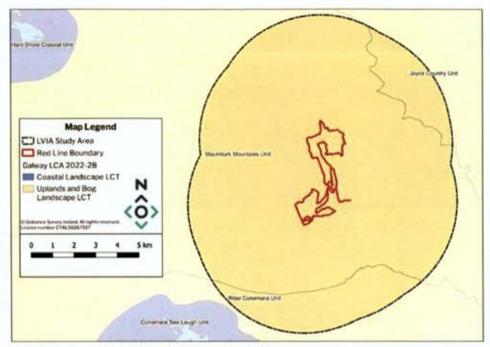


Figure 11: Landscape Character Types Map prepared by MKO

The site is identified within the Galway County Development 2022-2028 as Landscape Sensitivity: Iconic. The classification 'iconic' states that the landscape is unique with a high sensitivity to change.

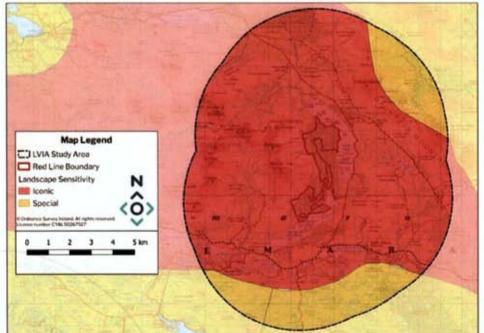


Figure 12: Landscape Sensitivity Map prepared by MKO.

The Galway Clifden Scenic Route runs south of the proposed development attend the Recess Letterfrack Scenic Route runs to the north and the west of the site. There are also 2 no. protected views both of which are south west of the site.



- No. 1 is Scenic View: Twelve Pins describes as "The focus of this view is the wooded island as the south end of Derryclare Lough. The bog and Twelve Bens in the background are important features of the view."
- No 2. is Scenic View: Droichead na Canálach which is described as "The focus of this view is the channel between Derryclare Lough and Ballynahinch Lough. The woods to the southwest are an important feature of the view."

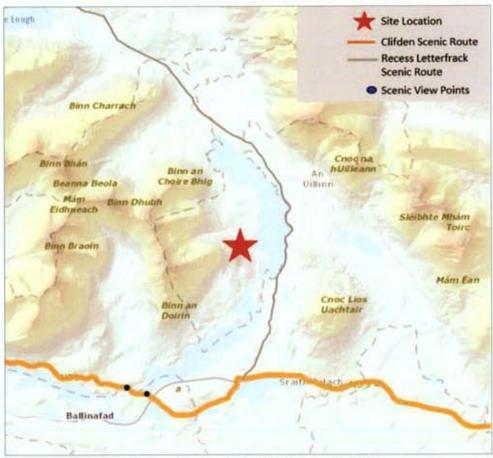


Figure 13: Scenic Routes and Viewpoints Map from GCDP 2022-2028. Prepared by MKO.





PLANNING HISTORY

Planning History of the Application Site/Landholding

This section sets out the relevant planning history of the site and its immediate surrounds. The planning history search that was carried out undertook a comprehensive search of the planning history on the subject site as well as within the site vicinity. There was 1 no. application on record on the Galway County Council Online Planning System for the subject site. This application is summarised in Table 4 below.

Table 4: Planning History of the Subject Site

Planning Reference Number	Description	Applicant	Decision
952407	Permission to moor a small smolt imprinting pen for 2-month period annually at Oorid Lough - Inagh Lough - Ballynahinch Lough	Ballynahinch- Fishery-System- Co-Op	Refused (14/12/1995): The proposed development is located in an area of outstanding natural beauty designated as an Area of Outstanding Scenic Amenity and would if permitted, cause a manmade physical feature to intrude into the landscape which would lead to the natural scenic and environmental amenities of the area.

5.2 Relevant Applications within the site vicinity

A review of the Galway County Council online planning application mapping system within a 2km buffer of the subject site within the past 5 years has been undertaken. The 2km radius is considered a reasonable distance to capture sufficient information on the planning history of the surrounding area given its rural nature. The planning history laid out in Table 5 below displays the Planning History within the site vicinity.

Table 5: Planning History within the site vicinity

Planning Reference Number	Description	Applicant	Decision SECTION
2193	Permission sought for the erection of a new 30m multi-user telecommunications support structure carrying 9 No.	Cignal Infrastructure Ltd.	Grand (1005/2021) subject to 9c



Planning Reference Number	Description	Applicant	Decision
	antennas. 6 No. communication dishes, 8 No. remote radio units, 3 No. lighting finials and 5 No. outdoor cabinets and all enclosed within a security compound by a 2.4m high palisade fence with a 4m access gate, site access and site works. The development will provide significant improvements in voice and broadband data services along the N59 National Road and the R340 and R344 Regional Roads		
201078	For a new dwelling house and garage/shed and to replace existing septic tank with a new wastewater treatment system and to demolish existing dwelling house with all associated works and ancillary services. Gross floor space of proposed works; 204sqm (house) 60sqm (garage)	Cathal Staunton	Granted (15/03/2021) subject to 13 conditions
191879	To demolish an old house, and a new house, sewage system and garage. Gross floor space of proposed works: 191 sqm. Gross floor space for any demolition: 40 sqm	Festus O Toole	Granted (16/03/2020) subject to 12 conditions ELOFMENT SECTION
181719	For an agricultural building and yard with all associated works and ancillary services. A Natura Impact Statement for the proposed development will be submitted with this application. Gross floor space of proposed works: 352.2 sqm	Cathal stuffe & 23	subject to 12 conditions ELOPMENT SECTION Grand 0 0 60 Grand 0 0 60 Grand 0 0 60 Subject to 10 out of the conditions of the condition
191669	For development of site at Eir Exchange, Lissoughter, Recess. The development will consist of the replacement of an existing telecommunications support structure (overall structure	Eircom Limited	Granted (17/12/2019) subject to 9 conditions



Planning Reference Number	Description	Applicant	Decision
	height of 18 meters), together with adjacent equipment cabinet, previously granted under planning reference no. 13/436, with a proposed new lattice tower structure (overall structure height of 22 metres) carrying the telecommunications equipment transferred from the existing structure and the addition of new telecommunications antennas, dishes and associated equipment, together with ground equipment cabinets, new wall and fencing		
18338	For the demolition of existing dwelling house, construction of a new dwelling house, domestic garage and a new effluent treatment system. Gross floor space of proposed works 238.8 sqm. Gross floor space of demolition 66.3 sqm.	Patrick & Ciara Burke	Refused (16/08/2018)
171026	To (1) demolish existing stone structure on site, previously granted under Pl Ref No. 08/2093 and 13/1223, (2) Permission to retain and complete existing blockwork structure on site on revised house plans (3) relocate proposed site entrance (4) Permission to construct a new domestic garage as well as all ancillary site works. Gross floor space of proposed works 106.10sqm, demolition 74sqm	Robert Needham & Megan Burke	Granted (05/03/2018) subject to 12 conditions
171381	Permission (previous ref. no. 11/387) for an existing development consisting of an existing 24 metre high telecommunications support structure, antennas, equipment	Vodafone Ireland Limited	Granted on (18/12/2017) subject to 5 conditions



Planning Reference Number	Description	Applicant	Decision
Number	container and associated equipment within a fenced compound and access track. The development forms part of Vodafone Ireland Limited's existing GSM and 3G Broadband telecommunications network.		





PROPOSED DEVELOPMENT

Development Description

The description of the proposed development, as per the public notices, is as follows:

'Coillte Teoranta (the applicant) seek a ten-year planning permission for development on a site located in the townlands of Derryclare (also known as Doire an Chláir) and Cloonnacartan (also known as Cúil na Ceártan), Co. Galway. The development will consist of the following:

- The felling/removal of some 343 hectares of conifer plantation for the purposes of peatland restoration and the establishment of native woodland.
- Measures to restore and rehabilitate approximately 281 hectares of Atlantic blanket bog and heathland that is currently planted with lodgepole pine and Sitka spruce forests and managed for commercial forestry.
- iii. Conversion of 62 hectares of conifer forestry to native woodland.
- iv. Main peatland restoration measures will include tree removal, drain blocking (manual and mechanical) and ground reprofiling.
- v. The control of existing invasive species on site and continued control during the restoration works to prevent their spread.
- vi. Drain-blocking all existing artificial drainage and artificial land drains currently existing within the peatland restoration areas in order to restore the high water table which is necessary for blanket bog growth
- vii. Provision of silt traps at outflows to block the pathway to the Twelve Bens/Garraun Complex Special Area of Conservation.
- viii. Deer fencing to protect 62 hectares of proposed native woodland
- ix. Provision of a Harvest Management Phasing Plan for the proposed project.
- x. Provision of new internal access road extending to 1.58 km
- xi. Across the site there will be 4 no. temporary water-crossings constructed in order to facilitate the harvesting of the timber at the site.
- xii. Provision of informational signage.
- xiii. Resurfacing of up to 8.23 km of existing forestry roads.
- xiv. Resurfacing of existing car park to facilitate public access.
- xv. Installation of water monitoring stations for real time water monitoring during operations.
- xvi. Cutting of roadside trees to improved sightline visibility at site entrance.
- xvii. The application is supported by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS).

This application is seeking a ten-year permission in order to allow for the phased completion of the Proposed Development.

The Proposed Development involves the felling of 343 hectares of coniferous forestry in various stages of the forestry cycle. The Proposed Development will restore up to 281 hectares of peatland habitat (blanket bog and wet heath) in the felled area. Peatland restoration is one of the primary nature-based solution to the biodiversity and climate crisis in Ireland, as blanket bogs accumulate and store carbon as well as possessing unique habitats with high biodiversity value. These peatlands also store and filter water, playing a vitat role in the



management of water catchments. The Proposed Development will also include the conversion of 62 hectares of conifer forestry to native woodland. The proposed new native woodland will be established primarily adjacent to the existing Derryclare Nature Reserve which is an old (possibly ancient) oak-dominated native woodland, thereby maximising biodiversity, water and climate benefits.

6.2 Temporary Watercourse Crossing

There is a total of 4 no. temporary watercourse crossing points required along the proposed temporary forestry road extensions. All proposed crossings are considered minor considering the flow and volume of water identified therein during the site investigation in November 2022. All watercourse crossings will comprise of standard log bridge crossings typically used in normal forest operations.

Please refer to Chapter 4 of the EIAR for further information.





7.1

PLANNING POLICY CONTEXT

This section of the report sets out the relevant European, National, Regional and Local planning policies which are of relevance to the planning application. The local planning policy section includes relevant policies and objectives outlined in the Galway County Development Plan 2022-2028 (GCDP), as relevant. Relevant material considerations are also set out below, as appropriate.

European Policy

European Biodiversity Strategy for 2030

The EU Biodiversity Strategy for 2030 sets out an ambitious and far-reaching programme of measures to halt and reverse biodiversity loss in the EU and across the globe.

The Strategy aims to address the five main drivers of biodiversity loss and put in place an enhanced governance framework, as well as fill any policy gaps, while at the same time consolidating existing efforts and ensuring the full implementation of existing EU legislation.

The Strategy highlights that the biodiversity crisis and the climate crisis are intrinsically linked. Just as the crises are linked, so are the solutions. Nature regulates the climate, and nature-based solutions, such as protecting and restoring wetlands, <u>peatlands</u> and coastal ecosystems, or sustainably managing marine areas, forests, grasslands and soils, will be essential for emission reduction and climate adaptation (<u>our emphasis added</u>).

The EU Biodiversity Strategy sets out four pillars:

- Protect Nature
- Restore Nature
- Enable Transformative Change
- EU Action to Support Biodiversity Globally

Pillar one: Protect Nature sets out a range of commitments and goals, which include to "strictly protect at least a third of the EU's protected areas - representing 10% of the EU land and 10% of EU sea including all remaining primary and old-growth forests as well as other carbon rich ecosystems, such as <u>peatlands</u>, grasslands, wetlands, mangroves and seagrass meadows" (our emphasis added).

It is noted that carbon-rich ecosystems, such as <u>peatlands</u>, grasslands, wetlands, mangroves and seagrass meadows will be targeted, in view of their importance for tackling climate change (<u>our emphasis added</u>).

European Green Deal - European Climate (2021)

The European Green Deal, initially introduced by the European Commission in December 2019, sets out the 'blueprint' for a transformational change of the 27-country block from a high



7.1.3

to a low-carbon economy, without reducing prosperity and while improving people's quality of life, through cleaner air and water, better health and a thriving natural world. The Green Deal is intended to work through a framework of regulation and legislation setting clear overarching targets, e.g. a bloc-wide goal of net zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels). This is a substantial increase compared to the existing target, upwards from the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement.

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the Next Generation EU Recovery Plan, and the EU's seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels. Achieving these emission reductions in the next decade is crucial to Europe becoming the world's first climate-neutral continent by 2050 would clearly be assisted by the Proposed Development.

Proposed Nature Restoration Policy

European Commission: Proposal for a Regulation on Nature Restoration

The proposal for a regulation on nature restoration sets out an overarching objective: "to contribute to the continuous, long-term and sustained recovery of biodiverse and resilient nature across the EU's land and sea areas by restoring ecosystems and to contribute to achieving Union climate mitigation and climate adaptation objectives and meet its international commitments".

To achieve this objective, the proposal sets multiple binding restoration targets and obligations across a broad range of ecosystems. These measures should cover a teast 20% of the Eld's 6 land and sea areas by 2030 and all ecosystems in need of restoration by 2050.

The proposal notes that overall, the benefits of restoring Annex I peallands, marshlands, countries, heathland and scrub, grasslands, rivers, lakes and alluvial habitats, and cooling wetlands can be estimated as being in the order of EUR 1 860 billion (with costs estimated in the order of EUR 154 billion).

European Union climate policy is being revised in order to follow the pathway proposed in Regulation (EU) 2021/1119 to reduce net emissions by at least 55 % by 2030 compared to 1990. In particular, the proposal for a Regulation of the European Parliament and of the Council amending Regulations (EU) 2018/841 and (EU) 2018/199961 aims to strengthen the contribution of the land sector to the overall climate ambition for 2030 and aligns the



objectives as regards accounting of emissions and removals from the land use, land use change and forestry ('LULUCF') sector with related policy initiatives on biodiversity. That proposal emphasises the need for the protection and enhancement of nature-based carbon removals, for the improvement of the resilience of ecosystems to climate change, for the restoration of degraded land and ecosystems, and for rewetting peatlands (our emphasis added). It further aims to improve the monitoring and reporting of greenhouse gas emissions and removals of land subject to protection and restoration. In this context, it is important that ecosystems in all land categories, including forests, grasslands, croplands and wetlands, are in good condition in order to be able to effectively capture and store carbon.

Provisional Agreement of the Land Use, Land Use Change and Forestry (LULUCF) regulation

The European Commission issued a press release on 11th November 2022 which states that the European Commission welcomes the provisional deal on the Land Use, Land Use Change and Forestry (LULUCF) regulation reached with the European Parliament and Council to increase the EU's target for net carbon removals by natural sinks to 310 million tonnes of CO2 equivalent by 2030. This agreement sets ambitious and fair targets for each Member State to reverse the decreasing trend of the EU's carbon sink.

The European Green Deal is the EU's long-term growth strategy to make Europe climateneutral by 2050. The revision of the Land Use, Land Use Change and Forestry (LULUCF) regulation is one of the 'Fit for 55' proposals presented by the Commission in July 2021 to make the EU's climate, energy, land use, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels. The LULUCF sector is responsible for both emitting and absorbing CO2 from the atmosphere, and specifically covers the use of soils, trees, plants, biomass and timber.

Under the European Green Deal, member states will be responsible for caring for and expanding their carbon sinks to meet the new EU target. Member States have many measures at hand to improve their land management, including sustainable forest management or the rewetting of peatlands (our emphasis added). It is advised that member states should update their strategic plans under the Common Agricultural Policy (CAP) to reflect the higher ambition for the land sector.

This provisional agreement now requires formal adoption by the Parliament and the Council. Once this process is completed, the new legislation will be published in the Official Journal of the European Union and enter into force.

National Planning Policy

National Biodiversity Objectives

7.2

7.2.1

In 2019 the Intergovernmental Science-Policy Platform on Riodiversity and Frasystem Services (IPBES) reported that, on a global scale, biodiversity loss continues in an unprecedented



manner (IPBES 2019). Land, ocean, atmosphere and biosphere are being altered to an unparalleled degree. Globally, seventy-five per cent of the land surface has been significantly altered, 66 per cent of the ocean area is experiencing increasing cumulative impacts, and over 85 per cent of wetlands (area) has been lost. Unless action is taken to reduce the intensity of drivers of biodiversity loss, there will be a further acceleration in the global rate of species extinction, which is already at least tens to hundreds of times higher than it has averaged over the past 10 million years.

According to data from the 2019 Article 17 Overview Report on the Status of EU Protected Habitats and Species (DCHG, 2019) 85% of EU protected habitats in Ireland are reported as having 'Unfavourable' status. Over 46% of these protected habitats are experiencing ongoing declines, with only 2% showing improvement in their status. The main drivers of this decline are agricultural practices which are negatively impacting over 70% of habitats, particularly ecologically unsuitable grazing, abandonment and pollution. Both blanket bog and wet heath habitat types have Unfavourable/Bad status.

The status of blanket bogs in Ireland is bad and continues to deteriorate. There are a number of pressures that affect blanket bogs, including overgrazing, burning, afforestation, peat extraction, erosion, drainage, and agricultural activities causing nitrogen deposition.

The status of wet heath in Ireland is also bad and continues to deteriorate. Area losses continue due to new forestry, paths, tracks and land clearance. Other pressures include overgrazing, burning, wind farm development and erosion. Nitrogen deposition from agricultural activities that generate air pollution has recently been recognised as negatively impacting this habitat. Climate change is also acknowledged to be a potential future threat to wet heath, due to expected rises in temperature and decreases in precipitation.

Ireland's national biodiversity objectives are set out in a number of key policy documents. These documents are discussed below.

National Biodiversity Action Plan

As a party to the UN Convention on Biological Diversity (CBD), Ireland has made a commitment to prepare Action Plans towards the achievement of the Convention stangets: namely to secure the conservation of biological diversity; sustainable use of its components; and the equitable sharing of the benefits arising out of the utilisation of swetic resources and the equitable sharing of the benefits arising out of the utilisation of swetic resources. Ireland's 3rd National Biodiversity Action Plan (NBAP)2017-2021, which was prepared to meet these commitments, sets out actions through which a range of government, civil and private sectors will undertake to achieve Ireland's Vision for Biodiversity that "biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essentially and sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally". Key objectives of the NBAP that are relevant to the proposed project include increasing awareness and appreciation of biodiversity and ecosystem services; conserving and restoring biodiversity and ecosystem services in the wider countryside; and expanding and improving management of protected areas and species.



7.3

Biodiversity Climate Change Sectoral Adaptation Plan

The Biodiversity Climate Change Sectoral Adaptation Plan considers terrestrial, freshwater and marine biodiversity and ecosystem services. The goal is to protect biodiversity from the impacts of climate change and to conserve and manage ecosystems so that they deliver services that increase the adaptive capacity of people and biodiversity. This is achieved by identifying adaptation options that will help to protect biodiversity and ecosystem services from the impacts of changing climate. A key objective of the plan is to "Protect, restore and enhance biodiversity to increase the resilience of natural and human systems to climate change" (our emphasis added). Priority actions that are identified in the plan include restoring and enhancing natural systems through management to increase resilience, and promoting ecosystem restoration and conservation though Payment for Ecosystem Services and investment in actions that increase carbon sinks while promoting biodiversity.

Project Ireland 2040: National Planning Framework

The Project Ireland 2040 National Planning Framework (NPF) is a planning framework to guide development and investment out to the year 2040. The NPF notes that the diversity of our biological communities is also important for the quality of our water, soils and as a source of food. Land use change, including in particular pressures from urbanisation, can have a direct and indirect impact on Ireland's habitats and species.

Under the NPF, the Government of Ireland pledges support to the protection and enhancement of carbon pools, such as forests, peatlands and permanent grasslands to ensure the inclusion of climate change as a matter of course in planning-related decision-making processes.

National Policy Objective 54: Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.

Additionally, the NPF highlights the tourism potential for peatlands, stating the following:

National Policy Objective 22: Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.

The proposed project will contribute to meeting Ireland's national biodiversity objectives as outlined above, by restoring up to 281 hectares of blanket bog and wet heath habitat that will promote greater biodiversity through habitat enhancement. The presence of an array of habitats (from both existing broadleaf woodland and blanket bog, and proposed blanket bog and wet heath restoration) will, in time, support an increasing number of flora and fauna species.



7.5

7.4 National Climate Objectives

The Climate Action Plan (DCCAE, 2021) which features 493 action plans sets out how Ireland will achieve a 51% reduction in overall greenhouse gas emissions by 2030 and lay the foundations for achieving net zero carbon emissions by 2050.

One of the key targets in relation to wetlands is "...rehabilitating 65,000 hectares of peatlands across numerous landowners and projects" by 2030. Ongoing and proposed measures to deliver the target include:

- Restore/rewet raised bog Special Areas of Conservation and Natural Heritage Areas as set out in the National Raised Bog Special Areas of Conservation Management Plan 2017-2022. Such restoration measures, and hydrological management of our protected peatlands, will halt and reduce peat oxidation and carbon loss.
- Undertake further research to assess the potential to sequester, store and reduce emissions of carbon through the management, restoration and rehabilitation of peatlands as outlined in the National Peatlands Strategy.
- Upgrade land-use and habitat mapping systems to establish the baseline condition of wetlands, and inform the development of best-practice guidelines for wetland management, including the management of degraded sites and peatlands currently exploited for energy peat extraction.
- Develop further measures to help rehabilitate exploited and degraded peatlands, including as part of national land-use planning and the new Common Agricultural Policy, and recognising that strategies may need to differ between regions.

The proposed project would enhance the rehabilitation of peatland by restoring up to 281 hectares of Atlantic blanket bog and wet heath that is currently drained and planted with poorly performing coniferous forestry. The rehabilitation of peatlands on the Derryclare site is focused on rewetting forested peats with the goal of re-establishing active peat bogs and other wetland habitats and so reverse the loss of carbon/GHG to the atmosphere from drying peats.

"Completion of project plan for Derryclare pilot site in Co. Galiray is identified as a step necessary for the delivery of Action 372 (Minimise the impact of deforestation of GHG emissions, while supporting wider government polices) of the Climate Action Plan. This step has now been completed and the proposed project consists of the implementation the project plan for the Derryclare Site and will therefore contribute to achieving the targets of the Climate Action Plan.

Native Woodland Establishment and Afforestation Targets

National policy is aimed towards increasing Ireland's forest cover in a sustainable manner. The document Forests, products and people: Ireland's forest policy – a renewed vision (DAFM, 2014) sets out an updated national forest policy strategy that takes account of the



substantial changes that have occurred in Irish forestry since the publication of its forerunner, Growing for the Future (DAFM, 1996).

The Forestry Programme 2014-2020 identifies four main requirements in relation to Ireland's forest sector:

- Increase on a permanent basis, Ireland's forest cover to capture carbon, produce wood and assist in climate mitigation;
- Increase and sustain the production of forest-based biomass to meet renewable energy targets;
- Support forest owners to actively manage their plantations;
- > Optimise the environmental and social benefits of new and existing forests

To meet these needs the Forestry Programme proposes the following measures:

- Afforestation and Creation of Woodland: Support for establishment and 15 annual premium payments for the creation of new forests. This measure includes afforestation, agro-forestry, forestry for fibre, and native woodland establishment (the latter focused on creating new woodland areas of important native woodland types and opportunities for habitat connectivity, and in environmentally sensitive areas, with a view to realising wider eco-system services such as water protection).
- Neighbour Wood Scheme: Provides support for the development of attractive 'close-to-home' woodland amenities for public access, use and enjoyment. This measure is aimed primarily at local authorities and semi-state bodies in association with community groups.
- Forest Roads: Support for the construction of forest roads is provided under this measure.
- Reconstitution Scheme: Support for forest owners to restore and retain forests following significant damage by natural causes.
- Woodland Improvement Scheme: This scheme provides support for forest management operations for broadleaf woodlands and actions within existing forests, which effect structural changes aimed to improve timber quality and protecting and enhancing water quality and other environmental sensitivities.
- Native Woodland Conservation Scheme: Supports the protection and enhancement of existing native woodlands and where appropriate, the conversion of conifer forests to native woodlands. This measure is focused on important native woodland types and opportunities for habitat connectivity, and in environmentally sensitive areas, with a view to realising wider eco-system services such as water protection.
- Knowledge Transfer and Information Actions: Supports the setting up of knowledge transfer groups, continuous professional development, and training.
- Producer Groups: Support is provided under this measure to help forest owners to work together to create a critical mass for forestry operations and mobilising timber;



- Innovative Forest Technology: Support for early adopters of new technology, e.g. low impact harvesters and/or inventory equipment.
- Forest Genetic Reproductive Material: Annual payment towards the cost of managing and conserving registered seed stands and establishing seed orchards.
- Forest Management Plans: Support for forest owners to prepare management plans for their forest holdings.

Under the Forestry Programme 2014-2020, the objectives of the Native Woodland Afforestation and Conservation Schemes (NWS) the creation of 2,700 hectares of new native woodlands and the conservation of 1,950 hectares of existing native woodland (including conversion from conifer forest to native woodland), respectively. The Forest Programme sets out a target of 1,070 hectares under the 'public woodland' category for the Native Woodland Conservation Scheme. Almost €24 million is provided under these two scheme measures for the implementation of the NWS of the Forestry Programme.

While the proposed project will result in a reduction in forested area, the areas targeted for restoration have been concentrated in areas where the existing plantation conifer forest is performing poorly and is deemed unsuitable and inappropriate for sustainable forestry and are at odds with climate and biodiversity policy. These poorly performing forest areas tend to be the least modified and contain peat characteristics that lend themselves well to peatland habitat restoration. Despite the proposed reduction in overall forested area, the proposed project will provide a contribution towards meeting Ireland's native woodland targets under the Forestry Programme 2014-2020 by establishing up to 62 hectares of new native woodlands in public ownership. The proposed native woodland establishment areas are focused on areas adjacent to existing old native woodlands on the site. At the time of writing, the Forestry Programme 2023-2027 has not been released/published.

In April 2011, the Government of Ireland made a number of key degistons relation to the conservation and management of Ireland's peatlands, particularly those sites and designation as Special Areas of Conservation national strategy on peatlands conservation and management was drawn up to provide direction Ireland's approach to peatland management.

Significant areas of Ireland's peatlands are owned and managed by public bodies, including Coillte and Bord na Móna. Coillte is the largest single landowner of blanket peatlands in Ireland and is the best placed organisation to deliver significant peatland habitat restoration at scale. The NPS acknowledges and includes Coillte's restoration works on afforested peatlands in Ireland by supporting Coillte's view that restoration will have a positive effect beyond the actual restoration area, for instance, on the adjoining intact bog that had been previously subject to "collateral" drainage effects. Coillte's previous LIFE projects (See Section 4.2 Bog Restoration of this Scoping Document for further details) have also resulted in increased knowledge and public awareness of the large-scale restoration of modified bog habitats across Ireland, therefore encouraging community engagement.



7.7

The following policy objectives have been outlined in relation to peatlands under Coillte management.

- NPS P 12: Future management of these State-owned peatlands will be in keeping with the objectives of the Strategy.
- NPS A 8: As part of the Forest Policy Review, the relevant authorities, working with stakeholders, will introduce guidance and criteria for the identification and future management of peat areas currently afforested. They will also provide clear guidance on future afforestation of peat soils.
- NPS A 9: The present management of State-owned peatland areas will be evaluated and alternative management options aimed at increasing the delivery of all the ecosystem services of naturally functioning peatlands will be considered.
- NPS P 22: The work of Bord na Móna, Coillte and the Irish Peatlands Conservation Council in developing ecologically rich futures for cutaway and formerly forested bogs will be developed. Such areas can bring new tourism and recreation attractions to the midlands and the west.
- NPS P 30: Coillte and Bord na Móna as the managers of significant tracts of peatlands on behalf of the Irish people will continue to show leadership in responsible management, rehabilitation and restoration of peatlands.

The proposed project addresses the policy objectives listed above.

The Climate Action Plan 2023

The Climate Action Plan 2023 CAP 23 sets out to implement the carbon budgets and sectoral emissions ceilings and sets a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050. This Climate Action Plan builds on the 2021 Climate Action Plan, some relevant key achievements of the 2021 plan include the "Commencement of rehabilitation works on over 10,000 hectares of peatlands damaged by extraction for energy production".

In terms of peatland restoration, the plan fully supports this and highlights the positive impacts peatland restoration will have. The plan highlights the important role of peatland restoration:

"Returning peatlands to more natural conditions will reduce carbon emissions and deliver a range of climate benefits, including: long-term carbon storage; increased carbon sequestration; and enhanced resilience to the locked-in impacts of climate change. The improvements to peatlands will enrich Ireland's natural capital; increase ecosystem services; strengthen biodiversity; and improve water quality and storage attenuation; as well as developing amenity potential. Several restoration schemes have reskilled workers and sustained employment while protecting the storage of millions of tonnes of CO2."

The measures and actions set out in Chapter 17 'Land Use, Land Use Change and Forestry include the following:

> Promote forest management initiatives in both public and private forests to increase carbon sinks and stores



Rehabilitate 33,000 ha of peatlands as part of the Bord na Móna Enhanced Decommissioning, Rehabilitation and Restoration Scheme and LIFE People and Peatlands programmes

The plan highlights the importance of restoring peatlands to their natural form, and states that forestry on peat soils generates emissions rather than decreasing them.

"Forestry on peat soils also generates emissions, and the extent of these lands in Ireland's forestry sector is significant, representing approximately 38% of the Forest land category. Again, this presents significant challenges with regard to emissions."

"The rehabilitation of degraded peatlands to a condition in which they regain their ability to deliver specific ecosystem services has considerable potential for initial mitigation gains and future carbon sequestration"

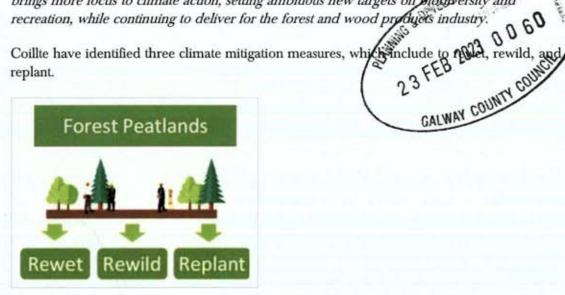
Table 17.6 sets out the key metrics to deliver abatement in Land Use, Land Use Change and Forestry, this includes a goal that by 2030 "41,700 ha of additional peatlands to be funded and rehabilitated".

Actions for 2023 include:

- LU/23/2 Develop, assess, and adopt as appropriate Coillte's Strategic Vision, which aims to capture additional carbon dioxide in its forests, soils and wood products by 2050
- LU/23/16 Seek opportunities for the public and private funding of peatland rehabilitation

Coillte: Strategic Vision for Our Future Forest 7.8 Estate

Coillte, as Ireland's state forestry company, has a key role in shaping the future of forestry in Ireland. Coillte have a stated strategic vision to deliver multiple benefits from our forms brings more focus to climate action, setting ambitious new targets on blodiversity and





7.9

The plan reports that the redesigning of forested peatlands through rewetting and rewilding will also potentially deliver biodiversity and ecological benefits.

It is highlighted that learnings from pilot projects such as the Wild Western Peatlands project (where Derryclare is a pilot project site) will also help us to develop a range of solutions for rehabilitating other similar areas.

It is a key ambition within the strategic vision to redesign 30,000 hectares of Peatland Forests for climate and ecological benefits by 2050. The pilot project at Derryclare is a key step in moving towards this overall goal by 2050, and will inform the upcoming projects that will contribute to achieving this goal.

Regional Planning Policy

Regional Spatial and Economic Strategy for the Northern and Western Region

The Regional Spatial and Economic Strategy (RSES) provides a high-level development framework for the Northern and Western Region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of Government. It provides a 12-year strategy to deliver the transformational change that is necessary to achieve the objectives and vision of the Assembly.

It is stated within the RSES that "peatlands and wetlands are the second most widespread land cover type in the Northern and Western Region, covering about 25% of the region".

The following policy objectives are outlined in relation to peatlands within the RSES:

- > RPO 5.5: Ensure efficient and sustainable use of all our natural resources, including inland waterways, peatlands, and forests in a manner which ensures a healthy society a clean environment and there is no net contribution to biodiversity loss arising from development supported in this strategy. Conserve and protect designated areas and natural heritage area. Conserve and protect European sites and their integrity.
- > RPO 5.6: Develop awareness and create a greater appreciation of the benefits of our natural heritage, including on the health, wealth and well-being of the region's ecosystem services.
- > RPO 5.7: Ensure that all plans, projects and activities requiring consent arising from the RSES are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.
- > RPO 5.22: To protect and conserve our designated peatlands and bogs for strong reasons of biodiversity, ecosystem services, carbon sinks, areas of habitation importance, amenity and landscape value.



Local Planning Policy

7.10.1 Galway County Development Plan (2022-2028)

The preparation of the Galway County Development Plan 2022 – 2028 (GCDP) commenced on the 18th of June 2020 and came into effect on the 20th of June 2022. The GCDP provides the strategic framework for land-use planning in the county and sets out the Vision and Strategic Aims for the county, which are supported by a number of policies and objectives.

Chapter 10 Natural Heritage, Biodiversity and Green/Blue Infrastructure of the GCDP outlines the strategic aims for increasing awareness, participation and understanding of Galway's natural heritage to safeguard and manage it. Policy objectives pertaining to Natural Heritage and Biodiversity state the following in relation to peatlands:

- NHB 6 Implementation of Plans and Strategies: Support 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 and any such plans and strategies during the lifetime of this plan.
- WTWF 1 Wetland Sites: Protect and conserve the ecological and biodiversity heritage of wetland sites in the County. Ensure that an appropriate level of assessment is completed in relation to wetlands habitats that are subject to proposals which would involve drainage or reclamation that might destroy, fragment or degrade any wetland in the county. This includes lakes and ponds turloughs, watercourses, springs and swamps, marshes, fens. Leath the allated, some woodlands as well as some coastal and marine basis as. Protect Ramsar sites under The Convention on Wetlands of International Importance (especially as Waterfowl Habitat).
- Waterfowl Habitat).

 P 1 Protection of Peatlands: Ensure that peatland areas which are designated proposed for designation) as NHAs, SACs or SPAs are conserved for designation, education and culture archiecological potential including any ancient walkways (toghers) through bogs.
- P 2 Best Practice in Peatland Conservation and Management: Work in partnership with relevant stakeholders on all suitable peatland sites to demonstrate best practice in sustainable peatland conservation, management and restoration techniques and to promote their heritage and education vale subject to Ecological Impact Assessment and Appropriate Assessment Screening, as appropriate.
- P 3 Framework Plans: Seek to support relevant agencies such as Bord na Mona in advancing rehabilitation works for the peatlands and related infrastructure, to provide for the future sustainable and environmentally sensitive use of peatland sites including for amenity purposes.

Bogs are a unique wetland habitat and serve as 'living archives' due to the presence of semifossilised plant remains and artefacts. They are a significant agricultural, biodiversity, community, education and tourism resource. In County Galway, upland blanket bog is found



in mountainous regions and lowland/Atlantic blanket bog is found in the Connemara lowlands and coastal areas. Raised bogs can be found in the lowlands of the north and east of County Galway.

The proposed project compliments the targets/strategy as set out in the Galway County Development Plan 2022-2028 by restoring blanket bog, wet heath and creating new native woodlands.







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PLANNING ASSESSMENT

Principle of Development

Rationale for the Proposed Development

The proposed Derryclare Wild Western Peatland Project is part of Coillte Nature's ongoing Wild Western Peatlands Project. The objective of the Wild Western Peatlands Project is to restore and rehabilitate approximately 2,100ha of Atlantic blanket bog and wet heath along the western seaboard of Ireland - that is currently planted with poorly performing inappropriate spruce and pine forests - to enhance biodiversity and improve carbon storage in the landscape. Peatland restoration is one of the primary nature-based solution to the biodiversity and climate crisis in Ireland, as blanket bogs accumulate and store carbon as well as possessing unique habitats with high biodiversity value. The subject site at Derryclare has been chosen as the pilot site for the Wild Western Peatlands project, which will contribute toward the end goal of restoring 2,100 ha of peatland.

Compliance with Planning Policy 8.1.2

The proposed development will comprise of the removal of approximately 343 ha of coniferous forestry for conversion to different land-use (bog restoration) at Derryclare, Co. Galway. The objective of the project is to restore and rehabilitate approximately 2,100ha of Atlantic blanket bog and wet heath along the western seaboard of Ireland - that is currently planted with poorly performing inappropriate spruce and pine forests - in order to enhance biodiversity and improve carbon storage in the landscape.

The relevant European, National, Regional and Local planning policies and objectives are outlined above. These policies mainly relate to biodiversity, patrice and peatland construction. climate change, and carbon reduction and it is considered that the proposed development is compliant with these referenced relevant policies.

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Table 6: Summary of Compliance with National, Regional, and Local Planning Policies

Relevant National, Regional, and Local Policy Objective	Compliance with National, Regional, and Local Development Plan Policy	
National Policies		
> NPO 54	The proposed development will have a positive impact on climate change by reducing our carbon footprint.	
> NPO 22	The proposed development will facilitate tourism development in terms of peatlands strategies.	
> NPS P 12	The proposed development will restore up to 281	
NPS A 8	hectares of peatland habitat, having a positive impact on	
> NPS A 9	habitats and the environment.	
> NPS P 22		
> NPS P 30		



•	Reg	ional Policies	
	>	RPO 5.5	The proposed development will support the sustainable use of natural resources ensuring a clean environment.
	>	RPO 5.6	The proposed development will create a greater awareness of the benefits of our natural heritage.
	>	RPO 5.7	The proposed development is subject to EIA and AA a appropriate.
	>	RPO 5.22	The proposed development will protect and conserve our designated peatlands and bogs for reasons of biodiversity, ecosystem services, carbon sinks, areas of habitat importance, amenity and landscape value.
•	Gal	al Policies: Chapter 10 of way County Development a 2022-2028	
	>	NHB 6 Implementation of Plans and Strategies	The proposed development will support the councils implementation of recommendations contained in the National Peatlands Strategy
	>	WTWF 1 Wetland Sites	The proposed development will protect and conserve the ecological and biodiversity heritage of wetland sites in the County.
000	>	P1 Protection of Peatlands P2 Best Practice in Peatland Conservation and Management	The proposed development will ensure that peatland areas are conserved for their ecological, climate regulation and their education and culture potential.
	>	P3 Framework Plans	The proposed development will support the rehabilitation of peatlands to provide for the future sustainable and environmentally sensitive use of peatland sites including for amenity purposes.

Project Alternatives and Benefits

The alternative option for the proposed site is for the site to deteriorate further by making no changes to enhance nature of the site and leaving it with little to no environmental benefits. As the site is currently planted with poorly performing inappropriate spruce and pine forests, and has been colonised by invasive rhododendron, the completion of this project would enhance biodiversity and improve the carbon/GHG storage in the landscape.

Atlantic blanket bog is a rare and precious habitat which is an important part of act cultural and environmental heritage. These landscapes provide a valuable habitat for many species including several rare plants, birds and invertebrate species. Pools that occur on the flatter areas of blanket bog support many mosses and plants and provide essential habitats for both migrating and resident wetland birds. Peatland restoration is one of the primary nature-based solution to the biodiversity and climate crisis in Ireland, as blanket bogs accumulate and store

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carbon/GHG as well as possessing unique habitats with high biodiversity value. These peatlands also store and filter water, playing a vital role in the management of water catchments.

Recreation Benefits

In addition to environmental benefits, the proposed development will also offer a number of social and recreational benefits with the new peatlands and woodlands. The proposed developments will create an opportunity to establish recreational and eco-tourism for use by members of the local and wider community alike. The establishment of native woodlands, in combination with rehabilitated peatland and wetland areas will be attractive to locals and visitors to the area because of its wildlife, history and variety of landscapes. This will provide a long-term benefit to both the local community and visitors to the area. Coillte operates an open forest policy that encourages the use of Coillte Forests for recreation.

Landscape Benefits

The Coillte property at Derryclare lies to the west of Lough Inagh and Derryclare Lough in Connemara. This area is a key tourist and angling destination and is close to the Wild Atlantic Way and the Western Way. The plantation forest is very visible from the surrounding area, and when it was planted over 50 years ago there was little consideration given to landscape design. This iconic site contains areas of high biodiversity value and therefore offers great potential for redesign and restoration. The removal of large blocks of non-native pine and Sitka spruce plantations, and in particular, standing dead/dying conifers that have failed will result in an improvement in the landscape aesthetics of the scenic Inagh Valley by lowering the treeline from upper slopes to allow the property to blend in better with the surrounding landscape.





8.2 Construction and Environmental Management (CEMP)

A Construction and Environmental Management Plan (CEMP) has been prepared by MKO and is submitted with the planning application.

The CEMP is presented as a guidance document for the management of construction activities and waste materials generated during the proposed restoration works and following completion. It clearly outlines the mitigation measures that are required to be adhered to in order to manage activities and waste materials in an appropriate manner.

Please refer to the submitted CEMP for further details.

8.2.1 Protection of Adjacent Natura Site

The requirement for a Construction Environmental Management Plan (CEMP) to be prepared in advance of any construction works commencing on any project that is the subject of environmental impact assessment and submitted for agreement to the Planning Authority is now well-established. The proposed procedures for the implementation of the mitigation measures outlined in such an EMP and their effectiveness and completion is typically audited by way of an Environmental Management Plan (EMP) Audit Report. The EMP Audit Report effectively lists all mitigation measures prescribed in any of the planning documentation, all conditions attached to the grant of planning permission and any further mitigation measures proposed during the detailed design stage. This will allow mitigation measures to be audited on a systematic and regular basis. Following confirmation that the mitigation measures have been implemented, their effectiveness will be the subject of regular review and audit during the full construction stage of the project.

The on-site construction staff will be responsible for implementing the mitigation measures specified in the EIAR and compiled in the Audit Report. Their implementation will be overseen by supervising foresters, hydrogeologists, environmental scientists, ecologists or geotechnical engineers, depending on who is best placed to advise implementation depending on the specific measures. The system of auditing referred to above ensures that the mitigation measures are maintained for the duration of the construction phase, and into the operational phase, where necessary.

Please refer to refer to Chapter 4 of the EIAR for more information.

8.3 Traffic Management

Chapter 13 of the EIAR has been prepared by Alan Lipscombe of Alan Lipscombe Traffic and Transport Consultants. This chapter of the EIAR concludes that the removal of approximately 343 ha of coniferous forestry for conversion to peatland restoration at Derryclare Forest over a 7-10 year period will generate relatively low numbers of additional HGV trips to and from the site. It is noted that background traffic volumes on the R344 and low and the local network will operate well within capacity up to and beyond the year 228. Any traffic impact on the surrounding road network will be temporary, lasting 7-11 years.



The construction phase of the project will require the import of local stone material for the finishing the proposed forestry access road extensions. Stone will be imported to provide a suitable capping material to complete the finishing layer on the road surface. Harvested timber will also be exported from the site for off-site processing. The scheduling of these deliveries will be coordinated by the contractor. The source of this material and delivery routing will be set out in a Traffic Management Plan to be prepared prior to the commencement of works.

Site Access and Transportation 8.4

During the construction phase, the site will be accessed via the existing entrance off R344 road from the N59 at Recess to the N59 at Kylemore which runs in a north-south directions along the eastern side of the site in the townland of Glenard. The R344 connects to the N59 approximately 2km south of the site entrance. All timber extracted from the site will be transported from the R344 to the N59. Following the completion of restoration works at the site, the site entrance will also be used for monitoring and maintenance activities, ongoing forestry activities on the property, and by the visiting public.

The construction phase of the project will require the import of local stone material for the finishing the proposed forestry access road extensions along with the exportation of harvested timber from the site. A Traffic Management Plan will be prepared prior to commencement of works in order to coordinate these deliveries.

For further information please refer to Chapter 4 of the EIA MINING PERSONAL COUNCIL

Peat Stability Report

The Geotechnical and Peat Stability Report was carried out by Fehily Timoney Engineering, Environmental Science and Planning Consultants.

The findings of the peat assessment indicate that the proposed Restoration Harvest Blocks and new and existing access roads, generally have a low risk of peat failure and are suitable for the proposed rehabilitation works. The findings include recommendations and control measures for rehabilitation work in peatlands, all of which will be implemented in full to ensure that all works adhere to an acceptable standard of safety.

In summary, the findings of the peat assessment showed that the site has an acceptable margin of safety, is suitable for the proposed peatland rehabilitation works and is considered to be at low risk of peat failure provided appropriate mitigation measures. The findings include recommendations and mitigation/control measures for rehabilitation work in peatlands, all of which will be implemented in full to ensure that all works adhere to an acceptable standard of

Please refer to the Geotechnical and Peat Stability Report by Fehily Timoney for further information.



8.7

Archaeology and Cultural Heritage

Chapter 11 of the EIAR which relates to archaeological, architectural, and cultural heritage was prepared by Tobar Archaeological Services. It presents the results of an archaeological, architectural and cultural heritage impact assessment of the Proposed Project.

No recorded monuments are located within the Proposed Project site and no significant direct or indirect impacts to the archaeological or cultural heritage resource have been identified. The implementation of mitigation measures in the form of a post clear-felling walk-over survey and a wade and metal detection survey of the temporary watercourse crossings is recommended, with the results of same informing any further mitigation which may be required such as preservation *in situ*, and archaeological monitoring. Any potential direct impacts to the archaeological resource will be effectively mitigated through the implementation of the recommended mitigation measures. No Protected Structures or NIAH structures are located within the Proposed Project site boundary or in the immediate vicinity of same. No direct or indirect effects to the surrounding built heritage resource are identified.

Environmental Impact Assessment

Deforestation for the purposes of conversion to another land use is classified as a form of development in Annex II, Paragraph 1(d) of the EIA Directive, which means at a minimum, such developments must be screened for the need for an EIA (pursuant to Article 4(2) of the Directive) either on:

- A case-by-case basis, or
- Where they are equal to, exceed or are below thresholds set by the Member State

This EU legal requirement is transposed into national Irish planning law inter alia by:

- The Planning & Development Acts 2000 to 2015; and
- The Planning & Development Regulations 2001 to 2013

Under the Planning & Development Act 2000, as amended (Part 1, section 4(1)(i)),

(i) development consisting of the thinning, felling and replanting of trees, forests and woodlands, the construction, maintenance and improvement of non-public roads serving forests and woodlands and works ancillary to that development, not including the replacement of broadleaf high forest by conifer species; is classed as 'exempted development'.

This means that is does not require planning permission from the local planning authority. However, this form of development does require other statutory consents, namely a felling licence and a licence for forest road construction under the Forestry Act 2014, as set out in the Forestry Regulations 2017 (S.I. 191 of 2017).

As deforestation is not listed as an 'exempted development' in the Planning & Development Acts or Regulations and as there is a mandatory threshold set out in the Schedule 5, Pari 2, Paragraph 1(d) (iii) iii) of the Planning & Development Regulations 2001, as amended, which requires:



8.8

'deforestation for the purpose of conversion to another type of land use, where the area to be deforested would be greater than 10 hectares of natural woodlands or 70 hectares of conifer forest ... '

to be subject to an EIA (and developments below that threshold involving deforestation to be screened for EIA), projects involving deforestation must obtain (in addition to a felling licence) planning permission either from the local planning authority or from An Bord Pleanála.

As the Proposed Development will include the conversion of more than 70 hectares of coniferous forestry to blanket bog and wet heath habitat an Environmental Impact Assessment (EIA) is required. MKO has been appointed as Environment Consultants for the project and will prepare an Environmental Impact Assessment Report (EIAR) in support of the planning application. The EIAR will be prepared in accordance with the requirements of Schedule 6 of the Planning and Development Regulations 2001, as amended, Directive 2014/52/EU, amending Directive 2011/92/EU, relating to the information to be contained in an EIAR, and the Environmental Protection Agency (EPA) 'Guidelines on the Information to be contained in Environmental Impact Assessment Reports' (May 2022).

The EIAR provides information on the receiving environment and assesses the likely significant effects of the proposed project on it and proposes mitigation measures to avoid or reduce these effects. The function of the EIAR is to provide information to allow the competent authority to conduct the EIA of the proposed project. All elements of the overall project have been assessed as part of the EIAR.

Appropriate Assessment

A Natura Impact Statement (NIS) has been prepared by MKO in relation to the proposed development on the site. It has been prepared in order to provide the information necessary to allow the competent authority to conduct an Article 6 (3) Appropriate Assessment of the

The project has been subject to the Appropriate Assessment screening process, which is contained within the submitted Natura Impact Statement 3 February 20060

'This NIS has provided an assessment of all potential direct or indirect adverse effects on European Sites whether considered individually or in combination with other plans and projects.

Where the potential for any adverse effect on any European Site has been identified, the pathway by which any such effect may occur has been robustly blocked through the use of avoidance, appropriate design and mitigation measures as set out within this report and its appendices. The measures ensure that the construction and operation of the Proposed Project does not adversely affect the integrity of European sites.

Therefore, it can be objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.'



8.9 Phasing

This application is seeking a ten-year permission in order to allow for the phased completion of the Proposed Development. It is estimated that the construction phase will take approximately 5-7 years from starting on site to the completion of restoration works. The development components over the 10 year period are comprised of the following;

- Tree Felling
- > Habitat Restoration and Enhancement
- Site Roads (upgrading existing and developing new temporary)
- Temporary Watercourse Crossings
- Visitor Entrance and Car Park Improvement
- Visitor Information Signage
- Deer Fencing
- Site Activities

Proposed maintenance includes annual monitoring of tree survival rates in areas where native woodland has been planted. A water quality monitoring programme for the site will be implemented which will include both chemical and biological water quality monitoring. Invasive species management will continue on an annual basis for at least 4 years following the completion of the construction phase of the project.

It is not intended that the proposed peatland restoration project will be reversed or removed as permanent planning permission is being sought for the change of land use from forestry to other habitat types. Therefore, it is intended that the Proposed Development will be retained as permanent and will not be decommissioned.

Please refer to Chapter 4 of the EIAR for more information on the phasing plan.





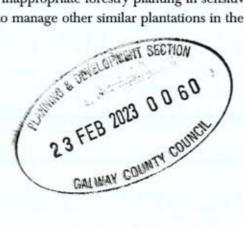
CONCLUSION

This proposed development seeks to fell and transform approximately 343 hectares of coniferous forestry plantation for the purposes of peatland restoration at Derryclare in Co. Galway. The proposed development will restore up to 281 hectares of peatland habitat (blanket bog and wet heath) in the felled area. Peatland restoration is one of the primary nature-based solutions to the biodiversity and climate crisis in Ireland, as blanket bogs accumulate and store carbon/GHG as well as possessing unique habitats with high biodiversity value. The Proposed Development will also include the establishment of up to 62 hectares of native pioneer woodland on areas cleared of coniferous forestry. The proposed new native woodland will be established adjacent to the existing Derryclare Nature Reserve which contains old (possibly ancient) oak-dominated native woodland, where appropriate, thereby maximising biodiversity, water and climate benefits.

As well as the stated environmental benefits this project will deliver, there are also associated recreational and landscape benefits if the proposed development proceeds. The proposed development creates an opportunity to establish recreational and eco-tourism for use by members of the local and wider community alike.

The alternative for this site is for it to be left as it is, with no environmental benefits and a deterioration of current peatland habitat condition.

Derryclare will act as an important demonstration area for Coillte and other stakeholders in managing the significant challenges posed by inappropriate forestry planting in sensitive western peatland areas and inform how best to manage other similar plantations in the future.







APPENDIX 1

WILD WESTERN PEATLANDS STAKEHOLDER INFORMATION DOCUMENT

Wild Western Peatlands

Stakeholder Information Document





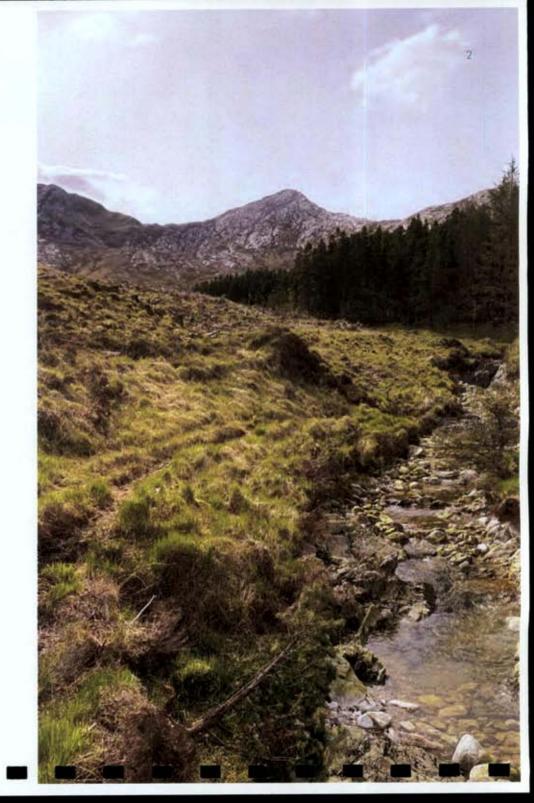
WILD WESTERN PEATLANDS

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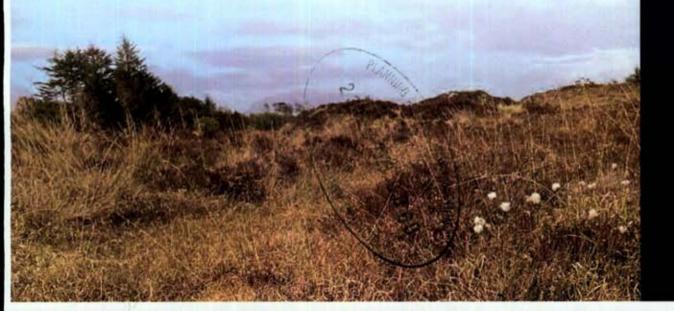


Purpose of Document

This document is part of a wider strategy to engage with stakeholders regarding Coillte Nature's Wild Western Peatlands project.

The document provides information about the rationale for this project, its scale and timeframe. You will also find information about the proposed sites where the project will take place and an overview of processes that may be used.

You will be introduced to the project team and find out how you can provide input on the project, whether this is general in nature or if you wish to provide detailed technical information.



After you have had time to review this document, we would like to know:

What is your overall reaction to this project?

What do you see as key obstacles or areas of concern for this project?

Can you provide us with technical or site-specific information that is relevant to this project?

Do you have comments on the draft list of priority sites for this project (see p7).

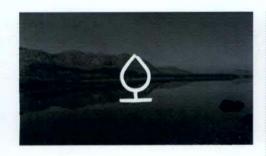
You will find details about the project team and how to connect with us at the end of this document. You can find out more about Coillte Nature at www.coillte.ie/coillte-nature

WILD WESTERN PEATLANDS

1.

About Coillte Nature

Coillte Nature is the not-for-profit branch of Coillte. We are building on 30 years' experience in forestry, land management and habitat restoration to deliver real impact on the climate and biodiversity crises through innovative projects-of-scale across four strategic themes:



Rehabilitating ecosystem services by bringing sensitive or degraded lands into better health



Reforesting our landscapes by planting new native woodlands on un-forested land



Restoring important biodiversity areas by investing in major habitat improvements



Regenerating urban forests for the benefit of people and nature

Coillte Nature is underpinned by principles of partnership, integrity and accountability, informed by the best ecological evidence, and supported through collaboration and engagement with public, private, non-governmental and community partners.

Why the Wild Western Peatlands project?

"These areas were planted to create rural employment at a time when the importance of peatlands for carbon storage and biodiversity was not well understood. The Wild Western Peatlands r international impured project will help us to develop a range for rehabilitating other similar areas for rehabilitating other similar areas project will allow us to rehabilitate a rare habitat



The National Parks and Wildlife's Prioritised Action Framework for Ireland (2014–2020)

The National Biodiversity Action Plan (2017–2021)

The National Peatlands Strategy (2018)

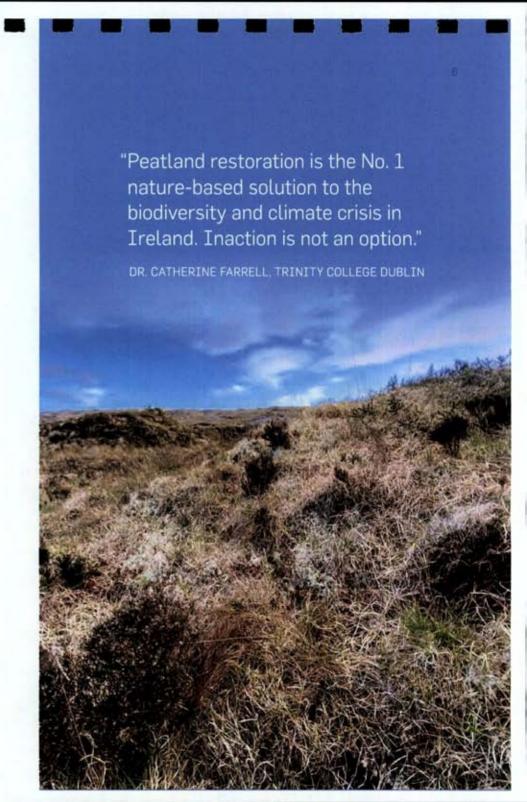
Atlantic blanket bog is a rare and precious habitat which is an important part of our cultural and environmental heritage. The Wild Western Peatlands project will see Coillte Nature redesign approximately 2,100 hectares of Atlantic blanket bog which is primarily planted with spruce and pine forests. Bog restoration is the most favoured redesign option for this project as it results in the restoration of the original Annex 1 peatland habitat.

Atlantic blanket bog landscapes provide a valuable habitat for many species including several rare plants, birds and invertebrate species. Pools that occur on the flatter areas of blanket bog support many mosses and plants, and provide essential habitats for both migrating and resident wetland birds.

Careful management of these areas is key for climate action as blanket bogs accumulate and store carbon. The peatlands also store and filter water, playing a vital role in the management of water catchments.

Our aim is to take an ecological approach to restoring and rehabilitating these sensitive landscapes. We'll do this by rewetting bogs and wet heath as much as possible and using other redesign methods such as developing riparian buffers and restructuring stands of lodgepole ping. Pioneer native woodlands will be established in some areas where rewetting isn't reasible, especially on free-draining slopes. These sparse pioneer woodlands will feature hardy native species like willow, birch and seots pine that are sourced in Ireland and ecologically appropriate for seposed locations.

The project will be delivered in partnership with state radies, communities and key NGOs to ensure technical synergy and a thorough understanding of the issues and delivery of best practice management of western peatland forests. Working closely with a range of stakeholders and ensuring ecological best practice are critical objectives for this project.



Shortlisted Sites

The following sites are to be given high priority

- 01 Glentornan, Co. Donegal
- 02 Glennamong, Co. Mayo
- 03 Derryclare, Co. Galway Pilot site, see p.9–12 for more details
- 04 Cappaghoosh, Co. Galway
- 05 Derrynafulla, Co Cork



The extent of these sites site exceeds the 2,100ha planned for the Wild Western Peatlands project and following stakeholder engagement and input this summer, project sites will be finalised.

These sites have been shortlisted taking the following criteria into account

- Representative of various challenges related to redesigning western peatland forests.
- Proximity and hydrological connection to SACs with blanket bog and wet heath habitats.
- Opportunity to partner with a range of key stakeholders.
- Sites that are representative of typical Coillte western peatland forests with a mosaic of unplanted and afforested areas.
- Sites are of low timber production value with the majority of conifers growing at Yield Class 12 or below.

A consultation process was undertaken with local management staff, environmental managers and stakeholders who have an in-depth knowledge of local sites leading to the selection of potential sites suitable for this project.

Environmental Goals and Actions

The redesign and restoration of sites in the Wild Western Peatland project will employ a range of approaches best suited to each site including:







Blanket bog and wet heath restoration

- Identify priority restoration sites rewetting and remove conifers (machine/mareal/ ringbarking)
- Reduce flows in drains with dame water levels and encourage bog vegetation
- natural regeneration of exotic conifers

Riparian buffer zones

- Identify key buffer zones and install silt traps to stop silt and nutrients entering watercourses
- Remove conifers very sensitively (machine/ manual/ringbarking) and brash from aquatic zones
- State willow cuttings, plant and seed lowdensity native trees and shrubs in riparian zones
 - Control invasive species and natural regeneration of exotic conifers

Landscape-scale forest redesign

- Restructure conifer plantation forests by clearfelling or thinning
- Restock with native woodland where appropriate (e.g. Scots pine, birch, alder, rowan, holly and willow)
- Manage naturally regenerating conifers
- Soften the forest edges creating more naturallooking gaps where native species may regenerate

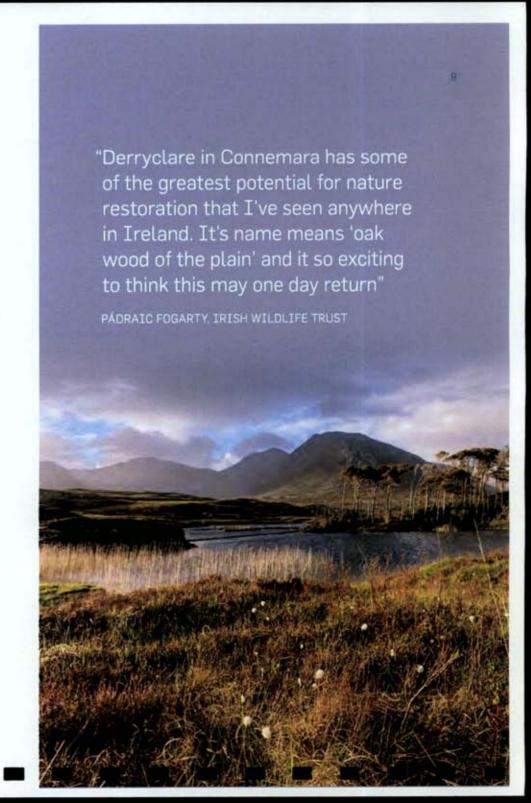
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Pilot site Derryclare, Co. Galway

The Coillte property at Derryclare lies to the west of Lough Inagh and Derryclare Lough in Connemara, North of the Galway to Clifden road (N59). This area is a key tourist and angling destination and is close to the Wild Atlantic Way and the Western Way. The forest is highly visible from the surrounding area, and when it was planted over 50 years ago there was little consideration given to landscape design. This iconic site contains areas of high biodiversity value and therefore offers great potential for resdesign and restoration.

To the south-east of the property lies an old oak-dominated woodland, designated in 1980 as Derryclare Nature Reserve and managed by the NPWS. It is one of the finest examples of semi-natural Atlantic oak woodlands in Ireland. The Reserve is enclosed to the east by the lake and the conifer plantations to the west, with no natural opportunity to extend its boundaries.





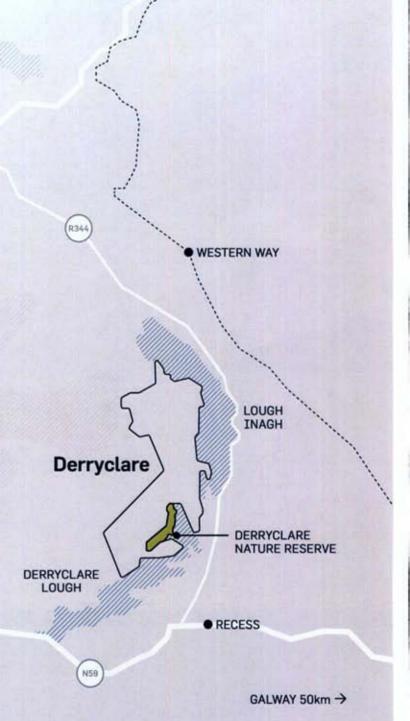
Pilot site Derryclare, Co. Galway

Area	Approx. 560 ha	
Elevation	10-180m	
Bedrock	Schist dominant,	
	Quartzite at elevations	

The Coillte property at Derryclare is undesignated but fully surrounded by the Twelve Bens/Garraun Complex Special Area of Conservation (Natura 2000 code: IE002031).



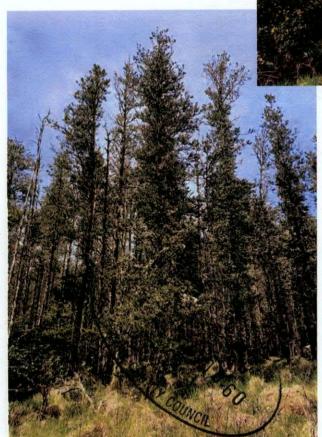
TWELVE

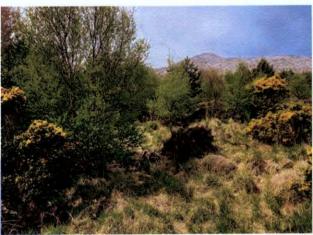


LEENAUN

CLIFDEN

BELOW — Lodgepole pine planted on deep peat

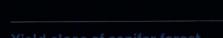




ABOVE — Regeneration of birch, heather and gorse

Tree cover on Coillte Derryclare property

	Lodgepole pine	53%	
	Lodgepole pine / Sitka spruce mix	21%	
	Sitka spruce	19%	
	Broadleaf	6%	
63	Larch	1%	



YC ≤ 10	70%	
YC 12	10%	
YC ≥ 14	20%	



Age structure of conifer forest

≤ 20yrs	39%
21-30yrs	9%
31-40yrs	4%
■ ≥ 40yrs	49%



Areas of Concern

Carbon Sequestration and Storage

Peatlands are globally important stores of carbon which are altered by changes in land use, including forestry, that disturb the soil or the water table. Drainage or cultivation usually results in loss of soil organic carbon (SOC) by carbon dioxide efflux, by particulate erosion or dissolved in rainwater drainage and runoff.

Conversely, forest growth can lead to an accumulation of SOC, through litter formation and incorporation of organic matter into the soil, as well as the carbon stocks accumulating in the trees. Afforested peatlands can act as sinks or sources of carbon dioxide depending on the balance of carbon input and loss.

This project will assess potential CO2 emissions depending on the future management scenarios for this property using on-site surveys and the best available research both from Ireland and internationally.

Water Bodies and Drainage

The Derryclare property has extensive drains/ streams/riparian zones which flow into Derryclare Lough and Lough Inagh which are key salmon angling destinations with populations of the protected aquatic plant species slender naiad (Najas flexilis) and pillwort (Pilularia globulifera). These waterways also feed into the Ballinahinch fisheryel swinstream. Forest operations need to be managed to pinimise and mitigate sediment loading which could lead to eutrophication of watercourses.

Red Squirres

Following a successful red squirrel (*Sciurus vulgaris*) translocation project at the adjacent Derryclare Nature Reserve in 2005, there have been sightings on the Coillte Derryclare site. The red squirrel is protected under the Wildlife Act (1976) and Wildlife (Amendment) Acts (2000 & 2010) and the Bern Convention (Appendix III). Key stakeholders will be engaged with to ensure that this population of red squirrel is taken into consideration in the management plans made for the property.

What is happening at Derryclare this season?

Surveying and collection of baseline data for Environmental Impact Statement (EIS) will take place over the summer of 2021. This will include hydrology and ecology surveys, habitat mapping and the compilation of a management plan.

13

The Coillte Nature team would like to hear from you...

We would like to know.

- What is your overall reaction to this project?
- What do you see as obstacles to, or areas of concern for, this project?
- Can you provide us with technical information that is relevant to this project?
- Are there issues that have not been mentioned in this document that you would like to see addressed in an Environmental/Natura Impact Statement?
- What do you think of the scope of this project regarding the scale and timeframe?
- Do you have comments on list of priority sites for this project? (See p7)



Dr Ciarán Fallon Director



Karen Woods Operations Manager



Dr Declan Little Ecological Lead



Hedda Dick Outreach Manager

To share your thoughts or for more information about the Wild Western Peatlands project please contact Coillte Nature Outreach Manager Hedda Dick on:

Email hedda.dick@coillte.ie

Phone 087 1927257

Meet us on-site at Derryclare or online:

Register your interest by emailing hedda.dick@coillte.ie
Due to COVID-19 restrictions, attendance at on-site visits will be limited

A WWP Project Manager and Project Team will be appointed over when coming months. This project is subject to planning requirements and to consent from DAFM where felling and deforestation is proposed.

For more information about The Wild Western Peatlands and other Coillte Nature projects see www.coillte.ie/coillte-nature



VIEW VIDEO HERE



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APPENDIX 2

STAKEHOLDER CONSULTATION FEEDBACK

Wild Western Peatlands



The Wild Western Peatlands pilot site at Derryclare viewed from across Lough Inagh in Co. Galway

On 29th June 2021 Coillte Nature held an online stakeholder engagement for the Wild Western Peatlands project. The purpose of meeting was to:

- Share overview information about the Wild Western Peatlands project and the pilot site at Derryclare
- Get initial reactions from stakeholders and explore potential challenges and opportunities for the project
- Encourage collaboration, support and learning between initiatives and organisations/agencies

This document outlines the key inputs from those attending this initial stakeholder engagement.

Representation

Thank you to everyone that attended and contributed to the online stakeholder event on 29th June. There was an excellent representation of stakeholders including:

Natural Capital Ireland

LAWPRO & Blue Dot

Forest Service

National Parks and Wildlife Service

Irish Wildlife Trust

Mildlife Trust Environm

Community Wetlands Forum

Wild Atlantic Nature LIFE

Irish Peatland Conservation Council

Forum Connemara

Inagh LIFE

Environmental Protection Agency

Irish Water

This initial engagement will be followed by additional community-based engagements for the various project sites.

COILLTE

The Wild Western Peatlands project will see Coillte Nature redesign approximately 2.100 hectares of Atlantic blanket bog and wet heath which is primarily planted with spruce and pine forests.

Bog restoration is the most favoured redesign option for this project as it results in the restoration of the original Annex 1 peatland habitat.

The pilot site is a 560ha Coillte property at Derryclare in Co. Galway. It is expected that up to five other large sites will be chosen with the following currently shortlisted:



05 Derrynafulla, Co. Cork

To request a copy of our Stakeholder Information Document for the Wild Western Peatlands project please contact hedda.dick@coillte.ie



REHABILITATING

Stakeholder Input

Ciarán Fallon, Director of Coillte Nature welcomed the participants and introduced the Wild Western Peatlands project. Operations Manager Karen Woods then gave a brief overview of the project.

Following Karen's presentation, participants joined break-out groups and were first asked for their initial reactions to the project (see across). Then the groups discssed what they saw as key opportunites and challenges for the project. Their input has been outlined below under the following themes:

- Community Engagement
- Learning, Collaboration and Solutions
- Challenges and Areas of Concern

Community Engagement

Stakeholders put a lot of emphasis on the importance of community engagement for this project, with a strong sense that it should occur 'early and often'. Other comments included:

- It is important to engage with local landowners on their knowledge, and engagement is critical. For example knowing about areas that flood
- Good communications are needed especially regarding managing fire and windrowing
- The project should invest in the local area and show community gain over time
- This should include social investment such as investing in skills and training
- 'Top down doesn't work' how the project is managed will be important and local consultation is important
- 'Locals would be enthusiastic' about the Derryclare project and the existing nature reserve

In break-out groups, stakeholders were first asked for their initial reaction to the project:

'Very innovative' 'Fantastic' 'Exciting and necessary' 'Excellent' 'Delighted' 'Very happy' 'Welcome' 'Great to see'

'Good to see a mix of options and a range of methods - not one size fits all'

'Take it slow and steady'; 'this is a long game'

'It's a big undertaking in a tight timeframe'

'Why not more than 2,100ha?'

'Great to see Derryclare included'

The project would 'inform the process for other sites along the west'

'Positive'

The project offers 'social and capital opportunities'

'Some areas are ticking timebombs'

'Is rewilding possible? Would it be acceptable?'

'Is it a bit late?' (in relation to acidity in rivers from conifer plantations)

'We will have to accept that sometimes things will go wrong'; 'adapt as you go'

Learning, Collaboration and Solutions

There was enthusiasm that this project could offer new learnings and solutions for similar future initiatives and related research. Comments and suggestions included:

- There is potential to create really good data
- Accounting and monitoring of water, biodiversity and carbon before and after is important to show changes over time
- The project could inform protection plans for water sources
- Use trial areas: 'you can't beat site knowledge'
- The hydrology should dictate what is most appropriate management approach for a site
- Start at the fop of the catchinent; use a 'source to tap' approach
- Would the project take a Natural Capital Accounting approach?

- There is potential for financial scalability for a project like this if appropriate structures are established.

There were several recommendations that this project should learn from previous similar projects both in Ireland and abroad such as the EU LIFE and Interreg Care-Peat initiatives - not only looking at what has worked but also at what hasn't worked.

It was mentioned that it was important to ensure that the Wild Western Peatlands project would be coherent with other existing projects.

The importance of working closely with the NPWS was highlighted regarding both the adjoining SAC and the Derryclare Nature Reserve.

It was also highlighted that it was important to 'tell the story and know the facts to guide future policy'

Challenges and Areas of Concern

Stakeholders mentioned various challenges or areas of concern which will be taken into account in the development of site management plans including:

- The proximity of project sites to Special Areas of Conservation (SACs)
- The correct selection of sites for restoration is important – some areas may not be suitable for bog restoration and native woodland could be an alternative.
- Concerns for water quality from the felling of trees
- Management of deer and sheep; deer will even swim across the lake to reach areas
- Management/control of invasive species; it was suggested that perhaps we need to learn to live with some of these.
- There may be naturalised species that depend on the plantation – could some 'islands' of conifers be left?
 There were also contrasting views that all non-native species should be removed.
- There is a population of red squirrels which have spread from the nature reserve that could be impacted
- Concern for nesting birds during operations
- Education may be needed in identifying lodgepole from Scots pine when removing (2)
- Windrowing can create issues for boorestoration
- Could leaving brash on steepreate a fire osk?
- How will the areas be managed and fenced after the project is finished?
- Is there a lack of expertise in restoration?
- Deep peat shouldn't be replanted on
- There could be peat stability issues
- There is a need for clarity on timelines and deliverables

What are the next steps?

Draft managment plan for Derryclare site

The comments and questions that arose at the online stakeholder engagement, and any additional feedback recieved in the meantime will be taken into account by the project team to create a draft management plan for the pilot site.

The ecological and hydrological reports will be completed shortly and the results of these will inform the site management plan. An Environmental Impact Assessment will also be carried out for the pilot site.

A project manager will be appointed shortly.

Further stakeholder engagement

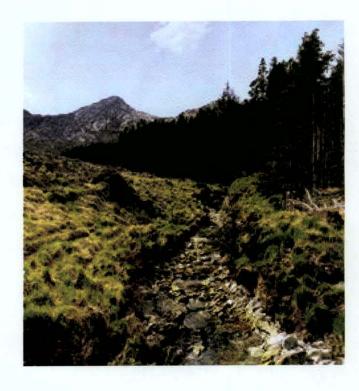
Further community-level consulation for Derryclare will take place over the coming months.

If you are interested in being involved in this, or know of other groups or individuals that should be included, please contact Coillte Nature Outreach Manager Hedda Dick on hedda.dick@coillte.ie or 087 1927257.

Site Selection

In addition to the pilot site, further Coillte sites will be selected to make up the 2,100 hectares of the total Wild Western Peatlands project in the coming years.

The shortlist of sites will be narrowed down according to a range of critera and taking on board feedback from stakeholders.



Have your say...

If you attended the event, do you feel that your comments and questions were recorded in this document?

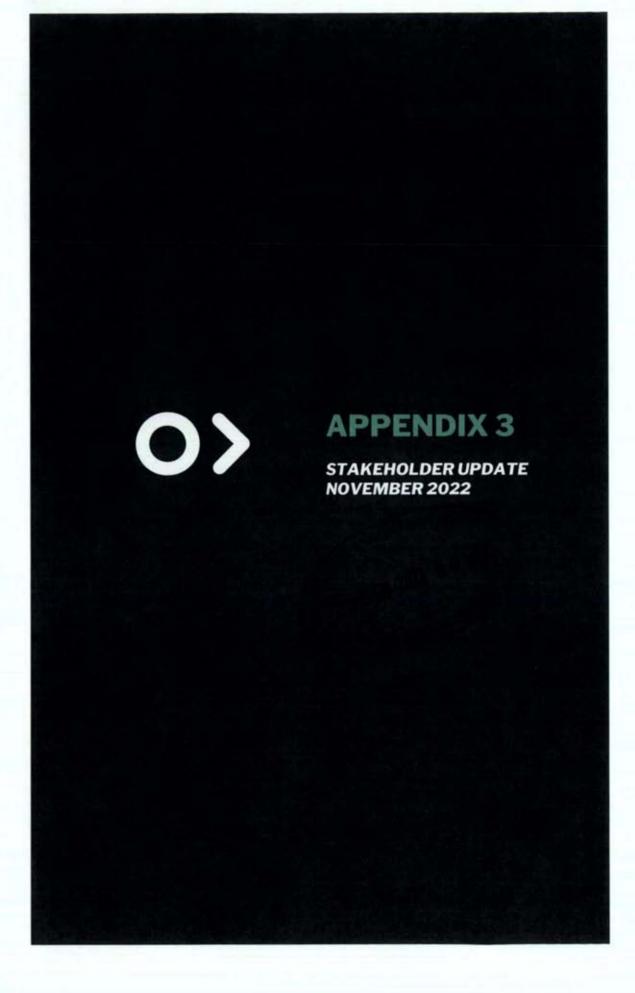
Have you had other thoughts about the project since the event?

Do you have thoughts you would like to share about the Wild Western Peatlands project but didn't attend the event on 29th June?

If you would like to discuss any of this further, please contact Coillte Nature's Outreach Manager Hedda Dick on hedda.dick@coillte.ie or 087 1927257.

We are keen to collaborate and engage with all stakeholders on this project.



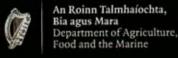




Wild Western Peatlands

Pilot site: Derryclare, Co. Galway Stakeholder Update







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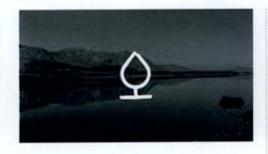
Watch our short Wild Western Peatlands intro video

Find out more on our Wild Western Peatlands web page

www.coilite.ie/coillte-nature/ourprojects/wildwesternpeatlands

About Coillte Nature

Coillte Nature is the not-for-profit branch of Coillte. We are building on 30 years' experience in forestry, land management and habitat restoration to deliver real impact on the climate and biodiversity crises through innovative projects-of-scale across four strategic themes:



Rehabilitating ecosystem services by bringing sensitive or degraded lands into better health



Afforesting our landscapes by planting new native woodlands on un-forested land



Restoring important biodiversity areas by investing in major habitat improvements



Regenerating urban forests for the benefit of people and nature

Coillte Nature is underpinned by principles of partnership, integrity and accountability, informed by the best ecological evidence, and supported through collaboration and engagement with public, private, non-governmental and community partners.

Atlantic Blanket Bog: Water, Biodiversity and Carbon

Ireland possesses 8% of the world's blanket bog and the most important country in Europe for this rare and unique habitat. Peatlands are valuable natural habitats and also provide a range of important ecosystem services

Water

Atlantic blanket bog occurs in areas with high rainfall, and a healthy bog is a wet bog, often made up of over 90% water. These bogs act as vast water reservoirs and have a vital role to play in the management of water within river catchments.

Biodiversity

Blanket bog is an Annex 1 Habitat under the EU Habitats Directive and provides a habitat for protected species such as golden plover, Greenland white-fronted goose and the marsh fritillary butterfly as well as many other species of plants, insects, amphibians, birds and mammals.

Carbon

Peatlands sequester and store a significant amount of carbon. They are globally the most important long-term land-based carbon store, as they can sequester carbon from the atmosphere and store it for thousands of years. However, human activity has resulted in the majority of peatlands in Ireland changing from being carbon sinks to becoming greenhouse gas emitters. For a bog to absorb carbon from the atmosphere, it must have a high water table or, in simple terms, it must be kept wet.



ABOVE Blanket bog provides a habitat for the protected marsh fritillary butterfly. Photo: Michael Bell



ABOVE Sphagnum mosses are an essential component of the community of plants that make up healthy blanket bog habitats

The Wild Western Peatlands Project

"These areas were planted to create rural employment at a time when the importance of peatlands for carbon storage and biodiversity was not well understood.

The Wild Western Peatlands project will allow us to rehabilitate a rare habitat of international importance. Learnings from this project will help us to develop a range of solutions for rehabilitating other similar areas."

DR CIARAN FALLON, DIRECTOR AT COILLTE NATURE



ABOVE The Common Hawker Dragonfly is found in blanket bog habitats. Photo: Michael Bell

The Wild Western Peatlands (WWP) project will restore and rehabilitate approximately 2,100 hectares of Atlantic blanket bog and wet heath that is currently planted with spruce and pine forests.

Coillteisnew strategic vision for forestry will see the redesign of 30,000 hectares of peatland forests by 2050 through a programme of reweting or rewilding. The WWP project is a publicly-funded project working to find solutions that will benefit climate, biodiversity, water quality and local communities.

The Aloject is path inder project which will allow us to develop technical, operational, regulatory, reporting and financing capacities for the restoration and rehabilitation of western peatland forests over the next 7-8 years. Derryclare in Co. Galway is the pilot site for the WWP project.

Pilot Site Derryclare, Co. Galway

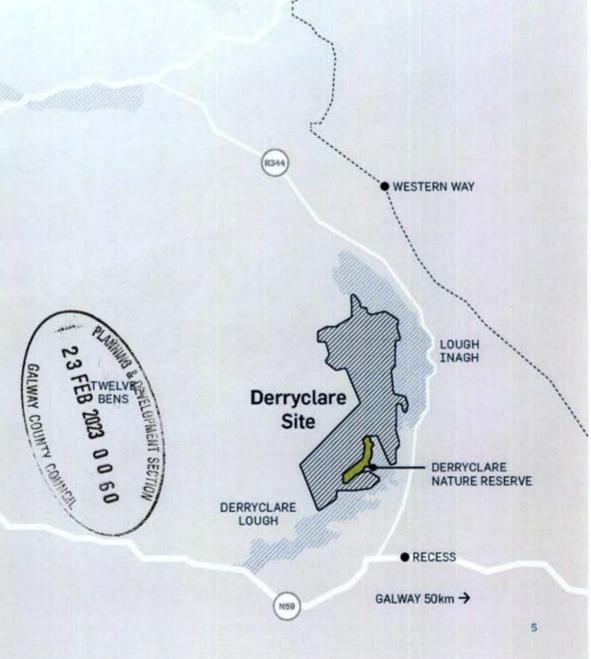
Area	Approx. 560 ha
Elevation	10-180m
Bedrock	Schist dominant, Quartzite at elevations

The Coillte property at Derryclare is undesignated but fully surrounded by the Twelve Bens/Garraun Complex Special Area of Conservation (Natura 2000 code: IE002031).

The Coillte property at Derryclare lies to the west of Lough Inagh and Derryclare Lough in Connemara, North of the Galway to Clifden road (N59). This area is a key tourist and angling destination and is close to the Wild Atlantic Way and the Western Way.

The forest is highly visible from the surrounding area, and when it was planted over 50 years ago there was little consideration given to landscape design. This iconic site contains areas of high biodiversity value and is in a highly sensitive water catchment, and therefore offers great potential for resdesign and restoration.

To the south-east of the property lies an old oak-dominated woodland, designated in 1980 as Derryclare Nature Reserve and managed by the National Parks and Wildlife Service. It is one of the finest examples of semi-natural Atlantic oak woodlands in Ireland. The Reserve is enclosed to the east by the lake and the conifer plantations to the west, with no natural opportunity to extend its boundaries.



LEENAUN

The Story So Far

The Coillte Nature team took on management of the project and a pilot site was chosen for the project:

Derryclare in Co. Galway.



Engagement has been carried out with a range of stakeholders and incorporated in the development of the management plan.



The Coillte Nature team have carried out knowledge-sharing visits to bog restoration projects in Northern Ireland and Scotland.



Coillte Nature is engaging with the regulatory and licensing process.





In 2019 funding by the Department of Agriculture, Food and the Marine was announced for the restoration and redesign of approximately 2,100 hectares of Atlantic blanket bog and wet heath that is currently planted with spruce and pine forests.

An Roinn Talmhaíochta, Bia agus Mara Department of Agriculture, Food and the Marine Following ecological, hydrological and LIDAR surveys, a management plan for Derryclare was compiled which aims to maximise the biodiversity, climate and water benefits.





Dr Dermot Tiernan has been recently appointed as Coillte Peatlands Manager and will oversee the WWP project as part of the wider Coillte Nature work programme.



Stakeholder Engagement

The success of this project relies on working with a range of interested parties.

An online stakeholder workshop was held in June 2021 with 40+ attendees, representing environmental NGOs, regulatory bodies, government agencies, community networks and local businesses, addressing key themes of:

- Community Engagement
- Learning, Collaboration and Solutions
- Challenges and Areas of Concern

Follow-on discussions on various aspects of management plan were carried out with a range of stakeholders and fed into the development of the management plan.

Stakeholders attended on-site engagements at Derryclare in June 2022 to discuss the proposed management plan. Coillte Nature will contiune with ongoing stakeholder engagement for the various Wild Western Peatland project sites.



COUNTY COUNCIL

LEFT Stakeholder meeting at Derryclare, June 2022

STAKEHOLDER COMMENTS FROM INITIAL ONLINE ENGAGEMENT, JUNE 2021

Fantastic

Innovative

Great to see Welcome

Delighted

Excellent

Necessary

Exciting

Very happy

'Take it slow and steady: this is a long game'

'Why not more than 2.100ha?'

The project would inform the process for other sites along the west

'The project offers social and capital opportunities'

'Great to see Derryclare included

'We will have to accept that sometimes things will go wrong': 'adapt as you go' 'Is rewilding possible? Would in be acceptable?'

'Some areas are ticking timebombs'



Managment Plan: Current and Target **Habitats**

A detailed management plan has been developed for the site using data collected during the ecological, hydrological and LIDAR surveys, as well as stakeholder feedback. The aim of this management plan is to maximise biodiversity, water and climate benefits.



ABOVE Sitka spruce on deep peat at the northern end of Derryclare.



ABOVE Flushed bog restoration site, Gowmoss, Scotland 18 months after 'forest to bog' restoration work.

The management plan aims to increase the blanket bog and wet heath habitats and to increase the amount of native woodland cover on the site.

Removing Conifers

The first priority is to remove areas of commercial pine and spruce trees which have reached maturity. The primary aim for these areas will be to restore the blanket bog and wet heath habitats. A draft felling schedule has been drawn up and careful planning will be carried out with the input of a harvesting contractor to ensure there is minimal impact on water quality and soils.

Restoring Blanket Bog

Bog restoration will largely be achieved by permanently raising the water table and creating the conditions for habitat restoration. This will be done by removing the trees, managing

the brash, slowing water flows and blocking drains, as well as using ground-smoothing techniques where appropriate. Many of the areas earmarked for restoration have quite an open forest canopy and the ground vegetation retains elements of the former peatland community due to the high water table.

Manging Invasive Species

Conifers regenerating on felled areas will be removed and there will be targeted control of rhododendron and deer management.

Protecting Water Courses

Several watercourses flow into two of the most important salmonid lowland oligotrophic lakes - Lough Inagh and Derryclare Lough. Careful mitigation measures and best practice will be implemented before, during and after these operations along with a programme of ongoing water monitoring.



Age structure of existing conifer forest

20	yrs or less	39%
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21–30yrs 9%

■ 31-40yrs 4%

■ 40yrs or more 49%



Yield Class" (YC) of existing conifer forest

YC 10 or less 70%

% YC 12 10%

YC 14 or more 20%



Forest Redesign

Some forested areas of the site are expected to be difficult to successfully rewet and restore to blanket bog and wet heath habitats. These areas are not priority areas to carry out interventions. Such sections of forest will be left to grow to maturity, as they potentially have a positive carbon balance in in the short and medium term.

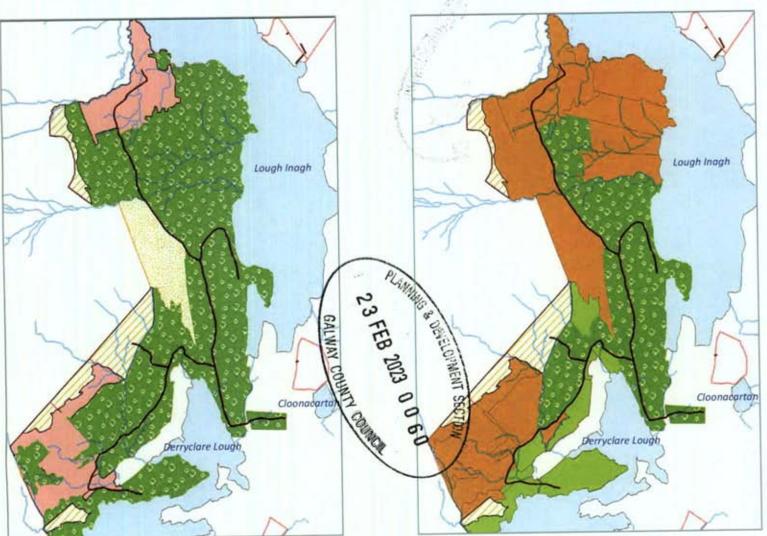
In some forested areas thinning operations will be trialled to increase the proportion of native species, creating the environment for a more mixed woodland to develop in future.

Establishing Native Woodland

There are small areas of the site where soils are more suitable for the establishment of pioneer native woodland, for example, parts of the site bordering the Derryclare Nature Reserve. Such areas will be seeded and planted with native tree and shrub species.

Current Habitats

Target Habitats



The Derryclare management plan aims to increase blanket bog and wet heath habitats and increase native woodland cover in order to maximise biodiversity, water and climate benefits for this site.

See page 5 for map in wider landscape.

Legend

EPA streams

---- Roads

Existing bog habitat

Heath, bog and recently felled

Heath, bog and young conifers

Forest

Native pioneer woodland

Restored bog and heath



WWP Shortlisted Sites



Meet the Coillte Nature Team



Dr Ciarán Fallon Director



Karen Woods Operations Manager



Dr Declan Little Ecological Manager



Hedda Dick
Outreach Manager



Lyn Sheeran Finance Manager



Dr Dermot Tiernan Peatlands Manager

For further information contact Hedda Dick , Coillte Nature Outreach Manager, on hedda.dick@coillte.ie or see www.coillte.ie/coillte-nature



