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Our Ref: 10774

26th February 2021

Your Ref: 20/676

Galway County Council Planning Department,
Galway County Council,
Áras an Chontae,
Prospect Hill,
Galway

RE: Connemara National Park – Planning Ref 20/676 RFI Reply

Dear Sir/Madam,

Further to your Clarification for Request for Further Information Letter dated 27th of July 2020, we now respond to the queries raised in the clarification as follows:

Item 1 – The proposed development is situated within The Twelve Bens/Garraun Complex SAC which is a European Site that forms part of the Natura 2000 network of sites of highest biodiversity importance for rare and threatened habitats and species across the European Union, afforded protected under the EU Habitats Directive (92/43/EEC) and the EU Birds Directive (79/409/EEC, as amended by Directive 2009/147/EC) and the European Communities (Natural Habitats) Regulations 1997, as amended by the European Communities (Birds and Natural Habitats) Regulations 2011, and are also further protected under Policy NHB 1, Objective DS 6, Objective NHB 2, Objective NHB 3, Objective DS 6, Objective AFF 5 and DM Standard 40 of the Galway County Development Plan, 2015-2021.

It is noted that Section 7.0 of the Natura Impact Statement received with this application sets out, inter alia, that in the absence of mitigation, the potential significant impacts on the Twelve Pins/Garraun Complex SAC and Illaunanoon SPA are: the potential reduction in water quality from the release of suspended solids and/or pollutants into the surface water system, the potential spread of invasive species, potential habitat loss or degradation, or potential disturbance or displacement effects.

While the mitigation measures as outlined in Section 5. Of the Natura Impact Statement received with this application are generally welcomed by the Planning Authority, it is necessary that more specific information be provided with regard to a number of mitigation measures to fully assess the application and provide conclusive evidence that the proposed project shall not have adverse effects either alone or in combination with any other plans or projects, on the qualifying interests habitats and species or on the overall site integrity, nor in the attainment of the specific conservation objectives, for the Twelve Bens/Garraun Complex SAC and Illaunanoon SPA. In this context, please address the following items:

- (i) Section 5.1.1 of the Natura impact Statement indicates that rainwater harvesting, and permeable paving will be incorporated into the design of the carpark and that the runoff from this area will pass through a hydrocarbon interceptor and attenuation tank. Please submit a Construction Environmental Management Plan for said works to inform the Appropriate Assessment of this application.*

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Response: A detailed Construction Environment Management Plan is enclosed along with the relevant supporting drawings and documentation which addressed the items raised as follows:

1. Section 2.3 of the accompanying Construction Environment Management Plan identifies the existing hydrological and hydrogeological environment within the vicinity of the proposed carpark while Section 5.3 addresses the surface water and hydrology aspects in relation to the proposed carpark. This Section goes into detail on how the proposed carpark works will be carried out and the measures which will be implemented to minimise impact from the development, i.e. The run-off rate will be controlled through use of an underground attenuation tank and a 'hydro brake' at the final manhole. Run-off will also pass through a Class 1 interceptor to minimise fuel/oil concentrations in the discharge.

(ii) Section 5.1.2.2 of the Natura Impact Statement indicates that silt fences shall be used during construction, that prior to the commencement areas for stockpiling of excavated material will be identified and that dewatering will be avoided where possible and if required this will be achieved by pumping excess water to settlement tanks or filtration systems located at the construction site with silt dewatering bags being used when water is being discharged. It appears from review of the plans and particulars received with this application that no Construction Environmental Management Plan (CEMP) or detailed plans, specifications and particulars of the foregoing have been received with this application. Please submit full details of the foregoing to inform the appropriate assessment of this application.

Response: Section 5.3 of the accompanying Construction Environment Management Plan addresses the surface water and hydrology aspects in relation to the proposed carpark. This Section goes into detail on how the proposed works will be carried out, with the measures implemented to avoid/reduce the release of suspended solids/pollutants into the surface water environment via surface water run-off, which include the following:

- a. Excavation works will not be carried out during or following heavy rainfall. Excavations will be covered during heavy rainfall to avoid the creation of surface water with high concentrations of suspended solids that would require dewatering. During lighter rain periods, the time over which excavations are left open will be reduced insofar as is reasonably practicable.
- b. The stockpiling of materials will be minimised on-site and will be situated where surface water percolates freely into groundwater and >50m from any watercourse/drainage ditch.
- c. Silt fences will be constructed using a permeable filter fabric and not a mesh. Silt fencing will be installed as per the manufacturer's guidelines and shall be maintained until vegetation on the disturbed ground has been re-established. The fencing will be installed between the proposed development area and any watercourse/drainage ditch. Once installed, the silt fence will be inspected regularly during construction and on an increased basis during heavy rainfall.
- d. Dewatering of excavations will be minimal and will be avoided, where possible. If required, dewatering will be carried out by pumping excess water to temporary settlement tanks or filtration systems located within the construction works area. These will be monitored at least twice daily and discharged to existing drains when water is within the prescribed water quality limits. Environmental Quality Standards (EQS) as set out in the European Communities Environmental Objectives (Surface Waters) Regulations 2009, as amended, will be applied for reference unless otherwise directed by the Local Authority or Statutory Bodies.
- e. In the absence of a significant source, a minor spill can be addressed effectively and efficiently on-site using existing best practice pollution control procedures. The measures set out in Section 4.6 will be followed to deal with any spills occurring.
- f. Fuel and oil handling as well as refuelling of plant and equipment will be carried out in strict accordance with the measures described in Section 4.5 of the CEMP.
- g. Wastewater generation from the welfare facilities will be discharged to an enclosed tank and removed off-site for treatment as required.
- h. On completion of the works, all apparatus, plant, tools, offices, sheds, surplus materials, waste and temporary erections or works of any kind will be removed from the site.



(iii) Section 5.1.2.4 of the Natura Impact Statement indicates that where it is not feasible or practical to completely avoid sensitive habitats, including Annex I Habitats, a board walk will be used. It is considered that prior to any determination in relation to Appropriate Assessment the precise location of any sensitive habitats, including Annex I habitats should be known and identified in plan with full details of all site-specific mitigation measures to prevent loss or diminution of said habitats. Please submit details of an updated ecological survey of the site with updated site layouts indicating the location of said habitats in the context of the routing and location of the proposed development together with detailed plans and particulars for site specific mitigation.

Response: An updated Ecological Survey was carried out and the location of sensitive habitats are now plotted on Drawings 10774-2028 and 10774-2029. These also identify the proposed path locations and types, to allow for easier cross referencing of proposed path and habitat typologies. The Drawings also specifically highlight the proposed location and extent of the proposed boardwalk locations (details of each path type are shown in the previously submitted drawings 10774-2022 and 10774-2023).

The Natura Impact Statement (NIS) has also been updated to reflect the above, in particular Sections 3 and 5 of the NIS Report. The AA Screening and Ecology Reports have also been amended to reflect the above.

A copy of the Connemara National Park Visitor Centre Management Plan (2020 – 2025) is included as part of this response which identifies further site-specific mitigation measures in relation to the above (refer to Section 6.3 of the Management Plan). This notes that the proposed trails will fit within the parameter of the National Trails Office (NTO) guidelines. In addition, dogs will be kept on a leash within the Connemara National Park and “Leave No Trace” principles apply to the entire site and will be displayed at trail heads.

The Management Plan also notes that Measurable indicators of deterioration are to be identified, and regular checks carried out along trails to determine whether certain areas within the trails network are particularly vulnerable to human-related deterioration. Checks will be carried out monthly, year-round, and relevant actions taken. If breeding pairs of Annex II species are found within distances to pathways which may cause significant disturbance, visitors will be rerouted in response.

A revised carpark layout for the Mweelin site is also included with this response (refer to amended Drawings 10774-2019 and 2020) which shows a reduction in the carpark size to 86 spaces (including 3 accessible spaces). This is to ensure that there is minimal impact on the adjacent section of peatland identified within the updated Ecological Survey. This will also result in the reduction in vehicular trips generated by the car park.

(iv) Section 5.1.2.4 of the Natura Impact Statement indicates that biosecurity measures will be put in place to ensure that no invasive species are introduced or spread during the construction phase. It is also noted that this section of the report indicates that during a 2019 ecological survey an invasive species was recorded on site and that an Invasive Species Management Plan based on thorough invasive species survey of the site indicating the location and extent of said invasive species in the context of routing and location of the proposed development together with detailed plans and particulars for site specific mitigation including detailed programme for invasive species control to inform the appropriate assessment of this application

Response: An Invasive Species Management Plan included with this response. A Contractor is currently appointed to carry out Rhododendron clearance works at the Mweelin site. As the works are being carried out within a sensitive habitat area, a number of requirements have been incorporated into the Works Contract to ensure the works are carried out in an environmentally responsible manner and are as outlined as follows:

- Methodology to be used:
 - Stem treatment will be the method used in this contract whereby a 14% solution of glyphosate (6 parts water 1 part glyphosate) will be applied to the cut or broken stem of the plant. Due to the time of year that this contract will come into the effect the plants will be in a state of semi-dormancy and as such it may take as long as up to 7 months for the herbicide to take full effect



and for the plants to fully die, however it will be possible to inspect the contract area to ensure correct methodologies were applied by visual inspection of treated plants.

- This is an area of important high priority habitat consisting of wet and dry heaths and blanket bog. Due to the presence of some cliff formations and steep terrain, this area is unsuitable for volunteers, student, or interns to work on.
- Plants less than 20cm in height:
 - Plants may be pulled manually provided that all root stock is fully removed from the ground and all associated earth is fully shaken off.
- Plants greater than 20cm in height:
 - For plants with a stem diameter of less than 2cm the stem can be broken at the base ensuring that the stem is not fully severed, and a 14% solution of glyphosate can be then applied to the broken area. For plants greater than 2cm, cut a notch with a hatchet from two sides of each stem and apply a solution of 14% herbicide.
- All seed capsules will be broken off the rhododendron plants by contractors.
- The area indicated on the Maps and Photographs with the Tender documentation to be carefully and systematically searched for rhododendron plants. Contractors are expected to treat any scattered rhododendron plants that may occur immediately adjacent Department of Housing, Local Government & Heritage – Rhododendron Framework Connemara National Park CNP Page 19 of 45 to but outside the area indicated on the map. This area is to be treated with the same Methodology as the requirements above.
- No Foliar spraying is permitted as part of the contract.
- All material belonging to the Contractors must be removed from the site.
- A record of the total amount of herbicide used and the dilution rates must be supplied to the supervising officer on completion of the contract.
- Any rhododendron plants not killed during the period of contract must be effectively retreated within six months.
- The supervising officer or his representative may instruct the Contractor to carry out the works in a particular order and/or to defer works for the period for reasons of conservation or safety.
- Great care must be taken to ensure that all empty herbicides containers are removed from the site and perforated a number of times in line with standard safety procedures.
- All Rhododendron plants to be treated using the appropriate method as per the requirements and methodologies as set out within the Tender documentation.

We enclose **two copies** of this RFI Clarification Response, and all associated documents as requested.

We trust that the above information is acceptable and meets with your requirements. However, should you require any further information please let us know. We await a favourable decision in due course.

Yours sincerely,



Micheál Geraghty

Project Manager

For and on behalf of TOBIN Consulting Engineers

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Encl: 2 copies of the following documents and drawings:

- Construction Environment Management Plan
- Updated Natura Impact Statement
- Updated AA Screening Report
- Updated Ecology Report
- Connemara National Park Visitor Centre Management Plan
- Invasive Species Management Plan
- Drawings
 - 10774-2000_B Site Location Map (Overall)
 - 10774-2001_B Site Location Map (Mweelin)
 - 10774-2019_C Proposed Carpark Layout
 - 10774-2020_C Proposed Carpark Layout
 - 10774-2021_C Prop Carpark Drainage Details
 - 10774-2028-C- Proposed Mweelin Route Path Type Layout
 - 10774-2029-B- Proposed Letterfrack Route Path Type Layout
 - 10774-2031-A Mweelin Annex 1 Habitats
 - 10774-2032-A Letterfrack Annex 1 Habitats

