



Forward Planning,
Mayo County Council,
Áras an Chontae,
The Mall,
Castlebar,
Co.Mayo.
F23 WD90

26 April 2022

Dear Sir / Madam,

RE: Material Alterations to the Draft Mayo County Development Plan 2021-2027

Further to the notice given to this Department of the publication of the Material Alterations to the Draft Mayo County Development Plan 2021-2027, the following submission outlines its observations in respect of a number of policy areas for which the Department is responsible.

Climate Action

The Council's overall approach to Climate Action in the Draft Plan is noted and welcomed. We would note, however, that the revised Climate Action Plan 2021 has since been published and request that the Draft Plan be updated to reflect same where possible (and the revised ambition and targets therein), having regard to the material alterations being proposed (e.g. it may be possible to update the references in certain sections, such as section 1.5 in Proposed Amendment no. CH 1.2). It is important that, where it can be facilitated at this stage in the plan-making process, Ireland's increased ambitions in respect of climate action are reflected in local statutory plans.



We note and welcome Amendment no. CH 7.1 – which includes, in the strategic aim for the chapter, reference to supporting the transition to a low carbon and climate resilient society.

Renewable Energy

The proposed material alterations contain some significant and positive references to renewable energy and the Council’s ambitions in that regard. The Department welcomes the commitment from Mayo County Council to review and update the Mayo Renewable Energy Strategy within one year of adopting this plan (Proposed Amendment nos. 11.2 and 11.5 refer – although we note that there are two versions of the proposed amendment to Policy REO 7 in the online version of the Material Amendments to the Draft Plan). In line with the submission of the Office of the Planning Regulator at Draft Stage (Observation 7) it would be preferable that an objective to vary the Development Plan to incorporate the revised Renewable Energy Strategy upon completion was included in the amended policies. This would ensure that any new Renewable Energy Strategy was given appropriate weight in the decision-making process in the future. We encourage the Council to engage with this Department in the review of the Strategy and officials can make themselves available at any time to assist the Council’s own executive in this regard.

The Department also welcomes the inclusion of proposed amendment CH 11.9, to achieve a minimum renewable energy target of 600MW for County Mayo over the course of this Development Plan, and the commitment to review/revise this target to ensure consistency with any future renewable energy strategies for the Northern and Western Region. This increase in ambition from the Draft Plan target of 100MW demonstrates the Council’s commitment to supporting the State’s renewable energy goals and the reference to revising the new target to ensure consistency with any future renewable energy strategies for the Region is welcomed – although it would be preferable to include a reference to “during the lifetime of this Plan” in the text of the new objective after REO 22 to ensure that the target can be updated during the Plan period.



Whilst the inclusion of specific Renewable Energy Targets is welcomed, details on the methodology / metrics utilised for their determination are required in the Plan itself (as per Recommendation no. 15 of the submission by the Office of the Planning Regulator at Draft Stage). We note the reference to the methodology in the Chief Executive's Report on the Draft Plan and suggest that this is included in the Plan for ease of reference for the public. In the determination and review of local renewable energy targets, it is important that Local Authorities consider their overall maximum potential contribution to the State's energy requirements and targets, as determined by available land, energy generation potential and environmental designations.

Additionally, the revised target should reflect the increased national ambitions set out in the Climate Action Plan 2021 for up to 80% renewable electricity by 2030 and an explanation of how the 600MW target relates to same would be beneficial to the public.

Offshore Energy

Proposed amendment CH 11.7 refers to offshore and tidal energy. The allocation of offshore renewable energy capacity will be resolved nationally and work on this is in progress through the development of the second Offshore Renewable Energy Development Plan (OREDPII) and reference to any future successor to the OREDP should be included in this policy provision (e.g. "... OREDP or any successor thereof...". The matters that can be taken into consideration in the assessment of offshore development applications are set out in the Maritime Area Planning Act, 2021 and the Council is requested to ensure that any planning policies that refer to offshore developments are assessed for compliance with same and the provisions of the National Marine Planning Framework.

Communications

The Department notes the inclusion of Proposed Amendment CH 7.7 – providing broadband ducting in all new developments. This policy is supported and will ensure that the roll-out of the National Broadband Plan is supported and connections are facilitated in new developments.



Inland Fisheries

The Department notes and welcomes Proposed Amendment DMS. 7 – which provides for the inclusion of Salmonoid Waters and Freshwater Pearl Mussel catchments in the list of ecologically sensitive sites.

Geological Survey Ireland

Additional observations from Geological Survey Ireland are attached to this submission.

Conclusion

We would be grateful if Mayo County Council would take these matters under consideration in the finalisation of the Mayo County Development Plan.

Department officials can make themselves available for a discussion on any matters raised in this submission or any other matters within the remit of the Department of Environment, Climate and Communications relevant to the preparation of this plan.

Officials can provide support to the County Council in the following areas:

- Climate Action, Engagement and Adaptation
- The Circular Economy
- Energy Generation and Networks
- Energy Use / Demand in the Built Environment
- Communications
- Environmental Policy and Governance
- Waste and Natural Resources and Inland Fisheries



Please direct any requests for further consultation to planningadvisory@decc.gov.ie

Regards,

Corporate Support Unit

Department of Environment, Climate and Communications

Encl. Divisional observations



Forward Planning
Mayo County Council
Áras an Chontae
Castlebar
Co. Mayo, F23 WD90

11 April 2022

Re: Material Alterations to the Draft Mayo County Development Plan 2021-2027

Your Ref: n/a

Our Ref: 22/115 [c.f. 20/339]

Dear Sir/Madam,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your email received on the 31 March 2022, concerning the Material Alterations to the Draft Mayo County Development Plan 2021-2027, please find comments from Geological Survey Ireland.

Natural Resources (Minerals/Aggregates)

In Chapter 4 'Economic Development', we welcome the inclusion of our 'Geological Heritage Guidelines for Extractive Industries' guideline document in Section 4.4.10 'Extractive Industries' and as an addition to objective EDO 60:

Proposed Amendment CH 4.8		
Section	Heading	Page no.
4.4.10	Extractive Industries	80

Amend the text in Section 4.4.10 of the draft plan as follows:

The Planning Authority will have regard to the Department of the Environment's Guidelines for Planning Authorities for Quarries and Ancillary Activities 2004 (and any updated editions) **and to the GSI's Geological Heritage Guidelines for Extractive Industries**, when assessing applications relating to the extraction industry in the county.

Proposed Amendment CH 4.9		
Section	Heading	Page no.
4.4.10	Extractive Industries	81

Amend EDO 60 as follows:

Have regard to the Quarry and Ancillary Activities Planning Guidelines for Planning Authorities DoEHLG (April 2004) **and to the GSI's Geological Heritage Guidelines for Extractive Industries**, or any new or subsequent quarry guidance.



Please note that use of our data or maps should be attributed correctly to 'Geological Survey Ireland' instead of 'GSI'.

Culture and Tourism

In Chapter 05 'Tourism & Recreation', Section 5.4.3.1 'Cultural and Amenity Tourism Objectives', we commend the inclusion of geological heritage within objective TR09:

Amend TRO 9 as follows:

Encourage sensitively designed and located development which provides for the appreciation, interpretation, upgrade and provision of access to natural habitats, scenic vistas and heritage **and geoheritage** features for the benefit of rural tourism, subject to normal planning and nature conservation consideration.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Clare Glanville
Senior Geologist
Geological Survey Ireland

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes
following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018
(S.I. No. 296 of 2018)

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes / Limitations	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Radon Map	Land & Soils/Air	National		http://www.epa.ie/radiation/radonmap/
Geoheritage	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fbd2aaac3c228
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a420f54877843aca1bc075c62b
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	Includes 3D models	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c16093beb2212a850ce6&scale=0
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a21718be1873d47a585a3f0415b4a724c
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	https://secure.dcca.gov.ie/goldmine/index.html
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turf/rough water levels (gwlevel.ie)	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9e46be08de41278b90a991160c0b9e
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		https://secure.dcca.gov.ie/GSI/INFOMAR_VIEWER/
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		http://www.cherishproject.eu/en/
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water / Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Active quarries	Land & Soils	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	https://gis.epa.ie/EPAMaps/default?zesting=7&northing=7&lid=EPA:LEMA_Facilities_Extractive_Facilities https://www.epa.ie/enforcement/mines/
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional		https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754

- Notes:
1. The maps and data listed above are available on the Geological Survey Ireland map viewer <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>
2. Please read all disclaimers carefully when using Geological Survey Ireland data
3. Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.