An Chomhairle Oidhreachta
The Heritage Council

Planning Ref: 2660157

16th March 2026

Planning Section
Galway County Council

Dear Sir/Madam,

RE: 2660010 1. continuation of quarrying activities for the extraction, by mechanical means only (wire and chainsaws), of dimension stone that includes: extraction within an area of 2.4 hectares; processing and storage of quarried material; provision of a wheel wash; provision of a hardstand area and hydrocarbon interceptor; all ancillary siteworks; for a period of 7years and all within an application area of 4.5Ha AT Ballydonnellan, Headford, Co. Galway

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a council (the board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and SI with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they related to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council has reviewed this application, with specific regard to the habitats within the application site boundary (the 4.5-hectare boundary) and those immediately adjacent. While the most intense extraction work is proposed within an area of 2.4 hectares where there appears to be evidence of existing quarrying activities; the proposed development includes all ancillary site works for a period of 7 years within an entire application area of 4.5 hectares.

Article 17 Spatial Data and associated Reporting has identified three parcels of the Priority Habitat 8240 Limestone pavement* which overlaps with this application boundary. Whilst the southern parcel appears to have been largely lost, as well as a section of the eastern parcel, the western parcel appears to be largely intact. The red line boundary of this application overlaps with this parcel and is therefore our primary concern.

In the recent Report on *The Status of EU Protected Habitats and Species in Ireland 2025* - the overall status of this habitat is assessed as *Inadequate* due to continuing area losses associated with conversion to agricultural land and housing construction, as well as scrub encroachment caused by under grazing. Clare, South Mayo and Galway have some of the best examples of this habitat type.

Policy Objective NHB 1 of the adopted Galway County Development Plan 2022-2028 seeks to protect plant and animal species and their habitats that have been identified under European

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Martina Moloney (Cathaoirleach | Chairperson), John Burgess, Damian Downes, Deirdre McDermott, Muiris Ó Céidigh, Dr. Patricia O Hare, John G. Pierce, Sheila Pratschke, Prof. Mark Scott, Dr. Mary Tubridy

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legislation (Habitats and Birds Directive), while Policy Objective NHB 4 seeks an ecological appraisal of biodiversity where appropriate, in order to protect and conserve areas, sites, species and ecological/networks of biodiversity value outside designated sites

Priority Annex I habitats as identified in the Habitats Directive that exist outside the designated/identified site network, are amongst the most important non designated habitats in the country. Where such habitats exist within the context of a development site, they need to be identified.

The Planning and Environmental Report, submitted with the application under the biodiversity section states that the 'The red line area of the site was observed as a working quarry, and has highlighted habitats typical of that use including: ED2 Spoil and bare ground; ED3 Recolonising bare ground; ED4 Active quarries and mines; BL3 Buildings and artificial surfaces. These habitats are associated with extraction, as noted in the report.

However, the Heritage Council submit, that following a desktop review, there is Priority Annex I Limestone Pavement habitat on site, with the most important parcel overlapping with the development boundary on the western section of the site. We recommend to the local authority that clarity be brought to the existence of this habitat, and an assessment of development impacts on the habitat be provided. This should include the entire 4.5 hectare area, and any habitats located immediately adjacent, as both construction and operation impacts may have effects. The assessment should account for:

- A description of any Annex I Limestone Pavement* Priority Habitat within and adjacent to the application site.
- The works as proposed and any expected loss in quantifiable terms to this habitat
- Mitigation measures for preventing any adverse effects on the habitat

This is required to ensure compliance with the aforementioned policy objectives of the adopted Galway County Development Plan 2022-2028

I trust these views will inform Galway County Council's determination of the application.

Yours sincerely.

Virginia Teehan

Chief Executive Officer

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