



An  
Bord  
Pleanála

## Inspector's Report ABP-314024-22

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<b>Development</b>	110kV "loop in-loop out" substation with overground transmission cables & associated works.
<b>Location</b>	Corville Road, Roscrea, Co. Tipperary.
<b>Planning Authority</b>	Tipperary County Council
<b>Applicant(s)</b>	Soleire Renewable SPV Alpha 2 Ltd.
<b>Type of Application</b>	Permission
<b>Type of Case</b>	SID
<b>Observer(s)</b>	Tipperary County Council
<b>Date of Site Inspection</b>	2 <sup>nd</sup> September 2022
<b>Inspector:</b>	Karla Mc Bride

## 1.0 Site Location and Description

- 1.1. The site is located c.4.5km to the SE of Roscrea Town Centre in County Tipperary, and c.160m N of the M7 Dublin to Limerick Motorway. It is located within a rural area and the lands are characterised by a mix of agricultural, cutover bog and commercial forestry uses. The site is bound to the W and S by the New Road (L3255) and the M7, and to the N and E by Birchgrove Road and several private access roads. The substation site is located within the townland of The Sheehy, whilst the linear overhead cable route is located within the townlands of The Sheehy, Monaincha and Corville.
- 1.2. There are several dispersed dwellings and farms in the vicinity, which are mainly located along the New Road to the SW. Monaincha Abbey, Sean Ross Abbey and Monaincha House are located to the far NW of the site, and there is a record of a Crannog within the site. The Sheehy Stream to the W of the site flows S to the River Nore and River Nore Bogs NHA. The River Barrow and River Nore SAC and River Nore SPA are located to the E of the site, and the Slieve Bloom Mountains SPA is located to the N.
- 1.3. There is an operational windfarm to the E (Monaincha) and three permitted but not yet constructed solar farms to the W and E.

## 2.0 Proposed Development

- 2.1. This SID application under S.182A relates to the provision of a 110kV “loop in-loop out” substation and associated electrical equipment, and 2 x 110kV overhead transmission lines, along with ancillary site works and local road upgrade works. The transmission lines will connect to the existing Ikerrin-Shannonbridge -Thurles 110kV overhead lines to the W of the site. The proposed substation will serve 3 x permitted Solar Farm developments on nearby lands to the E and W of the site (ABP-249060-22 & Refs. 19/601323 & 21/261).
- 2.2. The proposed development on the c. 3.46ha site would comprise:
  - A substation compound (c.1.66ha).
  - 1 x control building with busbar, transformer & high voltage switchgear compounds, associated electrical equipment and fencing.

- 2 x 110kV overhead transmission lines (2km x 9m), 2 masts & x polesets.
- Local widening of existing access track at junction the New Road (L3255).
- 2 x permanent access tracks & 1 x temporary construction access track.
- Tree felling (commercial forestry removal).
- Associated construction works and drainage infrastructure.

2.3. The application was accompanied by the following documents:

- Planning Report
- EIAR Screening Report
- Natura Impact Statement (NIS)
- Engineering & Architectural drawings
- Construction & Environment Management Plan
- Several environmental, ecological, transport, and landscape reports.

### 3.0 Observers

#### 3.1. Prescribed Bodies

**Transport Infrastructure Ireland:** No objection subject to compliance with normal roads requirements.

#### 3.2. Planning Authority Report

The Council report stated that it had no objection to the proposed development, subject to compliance with normal council requirements.

#### 3.3. Public submissions

None received.

#### 3.4. Oral Hearing

The Board decided that an Oral Hearing was not required and the submissions from the Prescribed Bodies and County Council were circulated to the applicant for information only.

## 4.0 Planning History

**ABP-312700-22:** Following a pre-application consultation the Board determined that the proposed substation constituted SID, potential impacts on visual amenity, residential amenity and the road network were highlighted and a list of Prescribed Bodies was provided for future consultations.

**PL.92.249060:** Permission granted by ABP for The Sheehy solar farm.

**Reg. Ref.19/601323:** Permission granted by the Council for Derrymore solar farm.

**Reg. Ref. 21/262:** Permission granted by the Council for Monaincha solar farm.

**Reg. Ref. 03510957:** Permission granted by the Council for Monaincha windfarm.

## 5.0 Policy Context

### 5.1. National and Regional policy

#### ***National Planning Framework, 2018-2040***

This Plan sets out a high-level strategic plan for shaping future growth and development to 2040. It seeks to develop a region-focused strategy to manage growth and environmentally-focused planning at a local level. It contains several National Strategic Outcomes (NSOs) which include seeking to achieve empowered rural economies and communities, enhanced amenity and heritage, and a transition to a low-carbon and climate resilient society. It seeks to support the development of the electricity from renewable sources, and the need to reduce reliance on fossil fuels and cut carbon emissions.

#### ***National Development Plan, 2021-2030***

This Plan underpins the National Planning Framework 2018-2040. It contains several priorities which include investment in regional growth potential.

#### ***Climate Action Plan, 2021***

This plan seeks to tackle climate breakdown and achieve net zero greenhouse gas emissions. The Plan includes a commitment that 70% of all electricity generated will be from renewable sources by 2030.

### ***Southern Regional Economic & Spatial Strategy 2020:***

The RSES supports the delivery of the programme for change set out in the National Planning Framework and the National Development Plan. It sets out a strategic vision and policy objectives for climate change, sustainable development and renewable energy. It seeks to support the development of the electricity grid which will enable the transmission system to safely accommodate more diverse power flows from surplus regional generation and facilitate future growth in demand.

### ***The Planning System and Flood Risk Management, 2009:***

These Guidelines seeks to avoid inappropriate development in areas at risk of flooding and avoid new developments increasing flood risk elsewhere and they advocate a sequential approach to risk assessment and a justification test.

## **5.2. Local Policy**

### ***Tipperary County Development Plan 2022-28***

#### **Strategic policies & objectives:**

**SO-1:** support the just transition to a climate resilient, biodiversity-rich, environmentally-sustainable and climate-neutral economy.

**SO-7:** protect, enhance and connect areas of natural heritage.

**Pol 3-1:** promote and facilitate renewable energy development.

**Obj. A-3:** support and facilitate the implementation of European and National objectives for climate adaptation and mitigation.

**Obj.3E:** support research and innovation in smart renewable energy technologies and initiatives to accelerate diversification away from fossil fuels.

#### **Policies & objectives:**

**Pol 11-1 & 2:** protect the network of European sites.

**Pol 11-3:** protect p/NHA sites.

**Pol 11-4:** conserve, protect and enhance areas of local biodiversity value, habitats, ecosystems and ecological corridors.

**Pol.11-7:** ensure the protection of water quality and require an undisturbed edge or buffer zone between new developments and riparian zones.

**Pol.11-9:** assess all new developments in line with the ‘Staged Approach’ and precautionary principle set out in the Flood Risk Guidelines and require the submission of site-specific Flood Risk Assessments for developments undertaken within Flood Zones A & B, and on lands subject to the mid-range future scenario floods extents.

**Pol. 11-15:** seeks to support the diversification of peatlands.

**Pol.11-16:** facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes.

**Pol.11-17:** ensure the protection of the visual amenity, landscape quality and character of designated ‘Primary’ and ‘Secondary’ amenity areas.

**Landscape & Built heritage:**

- Landscape Archetype: The Plains.
- Landscape Character Type A1: Lowland Pasture & Arable.
- Landscape Character Area 5: Templemore Plains.
- National Monument: Monaincha Abbey.

**5.3. Natural Heritage Designations**

European sites	p/NHAs
River Barrow & River Nore SAC River Nore SPA Slieve Bloom Mountains SPA	Nore Valley Bogs NHA Monaincha Bog/Ballaghmore Bog NHA Sheehills Esker pNHA Roscrea Bog pNHA

## **6.0 Planning Assessment**

The main issues arising are as follows:

- Principle of development
- Design, layout & visual amenity
- Movement & access
- Geology, soils & peat stability
- Water, drainage & flood risk
- Biodiversity
- Other issues

Section 7.0 contains Screening for EIA

Section 8.0 contains an Appropriate Assessment

### **6.1 Principle of development**

The proposed development would comprise the construction of a 110kV “loop-in-loop-out” air insulated switchgear (AIS) substation and associated electrical equipment and two 110kV overground transmission lines. The proposed substation and electrical infrastructure would serve the 3 x permitted solar farms to the W and E of the site that were granted permission by the Board and Tipperary County Council (Details in s. 4.0 above). The proposed overground transmission lines would connect the proposed substation to the existing Ikerrin-Shannonbridge -Thurles 110kV overhead lines c.2km to the W of the site.

The proposed development would contribute to the achievement of the objectives contained in the Climate Action and Low Carbon Development (Amendment) Act 2021 in relation to achieving a climate neutral economy by no later than 2050, as it would support the connection of permitted solar farms to the national grid.

The proposed development would comply with national and regional policy as set out in National Planning Framework - Ireland 2040 and the Southern Regional Spatial &

Economic Strategy, 2020 which seek to support the development of electricity infrastructure at appropriate locations.

The proposed development would comply with the policies and objectives contained in the current Tipperary County Tipperary Development Plan in relation Strategic Objective SO-1 which seeks to support the just transition to a climate resilient, biodiversity-rich, environmentally-sustainable and climate-neutral economy. The proposed development would comply with several further Development Plan policies which seek to facilitate the sustainable development, and promote and encourage the use of renewable energy. The proposed substation and overhead 110kV transmission cables would be located within lands that are in agricultural, commercial forestry and cutover bog use which are not covered by any specific land use zoning objectives in the County Development Plan or Roscrea Local Plan. Compliance with other relevant Development Plan policies and objectives (incl. transport, amenity, heritage, environment & biodiversity) will be addressed in the following sections of this report.

Having regard to the foregoing, I am satisfied that the proposed development, which would operate in conjunction with 3 x permitted solar farms would comply with relevant national, regional and local planning policy, is acceptable in principle.

## **6.2 Design, layout and visual amenity**

No concerns were raised in relation to design, layout and visual amenity.

The proposed development would be located within a rural area that is characterised by a mix of agricultural fields, commercial forestry plantations and cut-over bogs. The site and surrounding lands are not covered by any sensitive landscape or scenic amenity designations and there are no protected views or prospects in the vicinity. The site lies within Landscape Character Type A1 (Lowland Pasture & Arable) and Landscape Character Area 5 (Templemore Plains), the locally designated Natural Heritage Asset (Nore Valley Bogs) is located to the S and there is a National Monument (Monaincha Abbey) to the N.



The applicant has submitted a Landscape and Visual Impact Assessment (and Photomontages) which examined the impact of the substation and overhead cables on the surrounding area from several viewpoints to the N, S, E and W (incl. the surrounding road network, the Nore Bridge & Monaincha Abbey).

The proposed c.1.66ha substation compound would be located within a fairly remote commercial forestry plantation, to the W of an operational windfarm, E and W of 3 x permitted solar farms, and to the NE of a several detached houses and farm buildings along the New Road (L3255). The proposed c.2km long overhead transmission cables would extend W and traverse agricultural and cut-over bog lands located to the N of these houses and farms. It would connect to the existing Ikerrin-Shannonbridge -Thurles 110kV overhead lines to the W of the site, by way of new c.20m high polesets and lattice mast structures.

The application was accompanied by a Landscape and Visual Impact Assessment, Photomontages and a Landscaping Plan. The LVIA report described the receiving environment and the character of the surrounding area. It assessed potential visual impacts from several viewpoints (VP1 to VP6) around the site that encompass sensitive receptors (incl. the surrounding rural area, road network & heritage areas). The study also included an assessment of cumulative impacts in-combination with other renewable energy projects. It concluded that the proposed substation and overhead cables would not give rise to any significant visual impacts subject to boundary landscaping and habitat enhancement.

Having regard to my inspection of the site and surrounding area, and taking account of the scale, height and layout of the proposed substation, overhead transmission cables, masts and poleset structures on agricultural, forestry and cut-over bog lands within a rural area, and the absence of any sensitive landscape or scenic designations, I am satisfied that the proposed development would not have an adverse impact on the landscape or visual amenities of the area. The main visual impact would be from along the New Road (L3255) to the S, and this would diminish over time as the perimeter landscaping and habitat enhancement measure mature. Cumulative impacts would be local and not significant when the project is considered in-combination with the operational windfarm, the permitted solar farms, and existing overhead transmission lines.

### **6.3 Movement and access**

No concerns were raised in relation to movement and access.

The proposed development would be located within a rural area c.4.5 km to the SE of Roscrea Town Centre in County Tipperary and c.160m to the N of the M7 Dublin to Limerick Motorway. The surrounding area is served by several regional and local roads. The site is located along an access track that extends N off the New Road (L3255) to the W of the site, and this local road provides access to several houses and farms, as well as an operational windfarm and permitted solar farms.

The application was accompanied by a Construction and Environmental Management Plan (CEMP) and a Traffic Management Plan (TMP) which described the existing traffic environment (incl. road network, junctions & condition) along with other developments in the area (incl. the operational windfarm & permitted solar farms), and the proposed haul routes for equipment and materials. It was also accompanied by several environmental reports that examined potential impacts on the receiving environment (incl. population, air, climate & noise) including those emanating from construction traffic.

The TMP report dealt with the construction and operational phases of the proposed development. It stated that the construction phase would last c.18 months, the main vehicular access for construction vehicles would be off the M7 and via the N62, R445 and the New Road (L3255), which would require some minor localised upgrade works to accommodate construction traffic. A temporary construction access would be provided to the N of the site at Birchgrove to accommodate deliveries of overhead cable equipment. It estimated that c.500 loads (c.1,000 x 2-way) would be delivered to the site over a c.18-month period, which equates to an average of c.15 x 2-way movements /week or 2/day. The operational phase would generate a small number of maintenance visits per month.

The proposed construction works could have an adverse effect on the surrounding road network and the amenities of nearby houses and farms by way of general disturbance, traffic disruption, road soiling, restricted access, noise and dust. The CEMP and TMP contain several measures to address potential impacts and minimise disturbance. These measures include the implementation of a Traffic Management Plan, scheduling of traffic movements to minimise conflicts with other

road users, on-site car parking, temporary signage, wheel washing and road condition monitoring with remedial works (as required). The TIA predicted that the impact of the proposed development on the national and local road network, in combination with the operational windfarm, permitted solar farms and other activities in the surrounding area, would be short term during the construction phase and imperceptible in the operational phase.

Having regard to the scale and nature of the proposed development and the character of the surrounding road network (which has adequate spare capacity to accommodate additional traffic volumes), I am satisfied that the proposed development would not give rise to excessive traffic generation along the road network during either the construction or operational phase. The concerns raised by TII in relation to the need to engage with the relevant road authorities is noted.

Having regard to the foregoing, I am satisfied that the proposed development, taken in combination with the operational windfarm, permitted solar farms and other existing and permitted development in the surrounding area, would not give rise to a traffic hazard or endanger the safety of other road users during the construction and operational phases. This would be subject to the implementation of the CEMP mitigation measures and compliance with any suggested planning conditions.

#### **6.4 Geology, soils and peat stability**

No concerns were raised in relation to geology, soils or peat stability.

The gently undulating site which rises from S to NW (c.105mOD to c.110mOD) is underlain by Limestone bedrock and glacial gravels, with a covering of peat which ranges between 0.1m and 5.7m in depth across the site, but is shallow in the vicinity of the proposed works. The small stream that crosses the site flows SE to the River Nore over a distance of c.600m, and several drainage ditches traverse the lands. The nearest GSI recorded landslide occurred c.9km to the NE of the site within the Slieve Bloom mountains, the mapped Landslide Susceptibility for the site is “Low”, and there is no evidence of historic peat failures in the vicinity.

The application was accompanied by a Peat Stability Risk Assessment (PSRA) and Ground Investigation Report (incl. Soil Maps, Trial Pit Records, Peat Probe Records & Testing Methodologies). The reports described the receiving environment, identified potential impacts and proposed measures to mitigate any potential adverse impacts. The reports concluded that the impact of the proposed development on geology and soils would be short term during the construction phase with no risk to peat stability, following site specific mitigation.

The construction works could have an adverse effect on soils and in particular peat stability and erosion at the site of the substation, access tracks and along the 2km overhead cable route (incl. mast & poleset structures) as a result of tree felling and site excavations, which would result in the estimated removal of c.12,400m<sup>3</sup> of peat. The excavated material would be used for landscaping and habitat enhancement.

The PSRA, which was carried out in accordance with accepted guidance, indicates a “Medium” to “Low” ranking for instability and that any risk of collapse would be local to the specific elements of the project. Qualitative and Deterministic stability assessments indicate that the underlying soils are stable in the short (undrained) and long (drained) term, and that there is a low risk of instability. The report recommended site specific measures be put in place during the detailed design and construction phases to reduce any likelihood of a localised collapse (incl. stepping or battering back of excavations to a safe angle, or installing sheet piling to support peat & soft clays). This would reduce the instability ranking to “Low” across the site.

Having regard to the low-lying and gently undulating topography of the surrounding lands, the absence of landslides in the surrounding area, the low Landslide Susceptibility ranking, the nature and scale of the various projects elements, and the results of the PSRA and proposed mitigation measures, which include the site-specific management of peat and soft soils at the project elements, I am satisfied that the proposed development would not give rise to a risk of peat instability or soil erosion in the surrounding area. The re-use of the excavated peat and soils for landscaping and habitat enhancement are also acceptable.

## **6.5 Water, drainage and flood risk**

No concerns were raised in relation to water quality, drainage and flood risk.

The gently undulating site is underlaid by Limestone bedrock and glacial gravels, with a covering of peat. The underlying Aquifer is classified as Locally Important and moderately productive in local zones, and the site is located in the Nore surface water catchment. There are no recorded sensitive hydrogeological or groundwater features or resources in the vicinity. The River Nore is located c.600m to the S of the site and The Sheehys Stream is located c.134m beyond the SW corner. A small stream that crosses the site flows SE to the River Nore and several farm drainage ditches traverse the lands. There are no EPA monitoring stations in the vicinity.

The application was accompanied by a Construction and Environmental Management Plan (CEMP) and Flood Risk Assessment (FRA) which described the receiving environment, identified potential impacts on water quality and flooding, and proposed measures to mitigate any potential adverse impacts. The reports concluded that the impact of the proposed development on water quality, in combination with the operational windfarm and permitted solar farms and other activities in the surrounding area, would be short term during the construction phase and imperceptible in the operational phase. The FRA report concluded that the proposed development would not result in or give rise to a flood risk.

### ***Water quality & drainage:***

The excavation and construction works could have an adverse effect on ground and surface water quality by way of the uncontrolled release of fine sediments into surface water, the culverting of drains, and from accidental leaks and spills from fuel stores, plant, equipment and construction vehicles (incl. cement & concrete). Accidental spills from maintenance vehicles during the operational phase could affect surface water run-off and hence downstream water quality.

Surface water discharge during the construction phase of the substation and overhead transmission line excavations would be managed by embedded drainage arrangements (incl. silt fences). The measures contained in the CEMP, which include the management of sediment laden water and accidental spillages during the

construction phase, and the provision of 15m buffers around The Sheehys Stream and drainage ditches, would protect water quality in nearby watercourses and the integrity of the River Nore, as would the storage of fuels and chemicals in bunded areas, and designated areas for material storage.

Having regard to the proposed drainage arrangements and the CEMP mitigation measures, which are designed to protect water quality, I am satisfied that the proposed development would not give rise to a risk of water pollution in nearby or further downstream watercourses, subject to adherence to the final CEMP and best construction practices. There would be no significant discharges during the operational phase as the visits to the site by maintenance vehicles will be infrequent.

***Flooding & flood risk:***

The OPW maps have no record of any significant flood events in the vicinity of the proposed development. Some small areas in the S section of the site lie within an indicative fluvial flood zone with a number of smaller areas of indicative pluvial flooding located within the site boundary. The site does not lie within an indicative groundwater flood zone and the Historical “6-inch” and “25-inch” Maps do not indicate any historical or anecdotal flood events in the vicinity. The GSI Groundwater Mapping indicates no areas of predictive or historical groundwater or surfacing water flooding located or mapped within the vicinity of the sites. This area has not been included as an Area of Further Assessment as part of the Shannon CFRAM study.

National Indicative Fluvial Mapping indicates that a small area in the S portion of the site lies within an indicative present-day scenarios 1% AEP (1:100 year) and 0.1% (1:1,000 year) fluvial flood zones (with & without climate change scenarios). The applicant’s Site-Specific FRA (SSFRA) examined the likelihood of a flood event in the River Nore and The Sheehy’s Stream at and in the vicinity of the site (incl. substation & overhead cables), in line with the Flood Risk Guidelines (2009). It concluded that the proposed development lies within Flood Zone C (Low to Negligible Probability of Flooding) and that the project is not subject to the requirements of the Justification Test.

Having regard to the location of the proposed development within Flood Zone C, and notwithstanding that the lands may be susceptible to some localised pluvial flooding, and sections in the vicinity of the stream and drainage ditches, and the SE corner

section may be affected by minor localised fluvial flooding, I am satisfied that the embedded design measures, drainage arrangements and CEMP mitigation measures would ensure that the proposed development would not obstruct flow paths or give rise to any downstream flooding, or adversely impact the substation infrastructure.

## **6.6 Biodiversity**

No concerns were raised in relation to biodiversity.

The proposed development would be located within a gently undulating rural area that is characterised by a mix of commercial forestry plantations, cut-over bog and agricultural fields, and the boundaries are mainly defined by native trees, hedgerows and ditches. The River Nore is located c.600m to the S of the site and The Sheehys Stream is located c.134m beyond the SW corner. A small stream that crosses the site flows SE to the River Nore, and several drainage ditches traverse the lands. The site and environs provide habitats for terrestrial and aquatic wildlife.

The application was accompanied by an Ecological Impact Assessment, a Biodiversity Habitat Management Plan, and a Screening for Appropriate Assessment and Natura Impact Statement. The reports described the receiving environment (incl. habitats & species), carried out desktop and field surveys, identified potential impacts and proposed mitigation measures. The application was also accompanied by a Construction and Environmental Management Plan which contained construction phase mitigation measures to protect water quality and wildlife, and to ensure that the works are monitored and overseen by a project ecologist. The reports concluded that the impact of the proposed development on biodiversity in combination with the operational windfarm, permitted solar farms and other activities in the surrounding area, would be short term during the construction phase and negligible in the operational phase.

The permitted solar farms and proposed substation sites and environs are characterised by several non-designated habitats (incl. agricultural grassland, wet grassland, hedgerows, cut-over bog & riparian corridors). The lands are utilised by a variety of terrestrial and aquatic faunal species (incl. fox, hare, badger, otter, birds, bats, common frog, fisheries & aquatic invertebrates). The various desktop and field

surveys did not record the presence of any protected floral species, although some invasive species were present in the vicinity.

The proposed site clearance, excavation and construction works have the potential to affect biodiversity during the construction phase which could result in habitat loss and fragmentation, species displacement, diminution in water quality with resultant impacts on fisheries and aquatic invertebrates, and general disturbance from construction activities (noise, dust & traffic). The proposed development has the potential to affect biodiversity during the operational phase as the substation compound could act as a barrier to mammal movement and the overhead cables could pose a collision risk to birds.

***European sites:***

Section 8.0 of this report deals with potential effects on SACs and SPAs and it includes an Appropriate Assessment. It is possible that the project site may also be hydrologically connected to some further afield designated, or that the lands are of value to mobile species. This concern is addressed in section 8.0 below.

***Natural Heritage Areas:***

Although there several p/NHA sites located within a 5km radius of the site, there is only one with a possible aquatic connection with the development site via on-site drainage ditches and watercourses that ultimately drain S to the River Nore. However, the Nore Valley Bogs NHA would not be adversely affected by the proposed works subject to the implementation of the CEMP water quality protection mitigation measures outlined above in section 6.5 and adherence to best construction practice.

***Habitats, flora & fauna:***

There are no recorded or designated sensitive habitats or floral species in the vicinity. However, the surrounding mature trees, hedgerows, shrubland, wetlands, cut-over bog, ditches and watercourses may be of value to faunal species (incl. badger, otter, hare, birds, bats, common frog, invertebrates & aquatic wildlife) which could be disturbed and displaced during the construction works. However, it is likely



they would return to the environs of the site when the works are completed, in which case fencing panels should be erected in such a manner so as allow mammals to traverse the site. This could be addressed a planning condition. The proposed boundary landscaping and habitat enhancement measures will have a positive impact on biodiversity.

Having regard to the location of an operational windfarm to the E and several overhead cables and pylons in the vicinity, it is probable that birds have already habituated to the aerial presence of infrastructure, and it is unlikely that the proposed cables would pose a collision risk to birds. However, to err on the side of caution the overhead cables should be fitted with bird deterrents to improve visibility. This could be addressed a planning condition.

Vegetation clearance should not take place during the bird nesting season and preconstruction seasonal surveys should be undertaken for bats and otter and a Derogation Licence sought for their removal and relocation if required. The release of pollutants to watercourses with resultant impacts on water quality, aquatic ecology and fisheries (incl. European eel) which are susceptible to smothering from suspended sediments would be avoided by way of the 15m buffer zones around watercourses and ditches. The implementation of the CEMP water quality protection mitigation measures outlined above in section 6.5 and adherence to best construction practice, would protect constituent aquatic species and/or prey species for Otter and Kingfisher from any adverse impacts. Artificial lighting should be kept to a minimum so as to minimise disturbance to wildlife, including any commuting and foraging bats. Any outstanding concerns not already covered by the mitigation measures could be addressed by way of a planning condition.

***Conclusion:***

Having regard to the embedded design measures, drainage arrangements and the CEMP mitigation measures, I am satisfied that the proposed development would not have an adverse impact on biodiversity, subject to adherence to the final CEMP, adherence to best construction practices and the implementation of any recommended conditions. There would be no significant impacts during the operational phase.

## 6.7 Other issues

**Residential amenity:** No concerns were raised in relation to residential amenity. The application was accompanied by several environmental reports that described and examined potential impacts on the receiving environment (incl. population, air, climate, landscape, noise & traffic). There are no houses located in the immediate vicinity of the substation, and the c.2km long 110kV overhead cables would be located in excess of 150m from the nearest houses located along the New Road (L3255). These houses would experience some disturbance during the substation and cable connection works in terms of construction traffic, noise and dust. However, the impacts would be managed and mitigated by the measures contained in the CEMP and no long-term impacts anticipated during the operational phase.

**Cultural heritage:** No concerns were raised in relation to archaeology and cultural heritage. The application was accompanied by an Archaeological and Cultural Heritage Impact Assessment report that described and examined potential impacts on the receiving environment. There is a National Monument (Monaincha Abbey) located to the N of the site which would not be affected by the proposed development. There are several Recorded Monuments within a c.2km radius of the proposed development (incl. Ringforts, Enclosures & Earthworks), including a possible Crannog along the route of the overhead cable route which the excavation works would avoid. However, there may be potential for undiscovered archaeological artefacts within the site, and the standard archaeological monitoring condition should be attached. There are no protected structures or NIAH features within or close to the site, and any sensitive structures and features located in and around Roscrea would not be affected by the proposed development (incl. Monaincha Church).

**Cumulative Impacts:** No concerns were raised in relation to cumulative impacts. There are several existing, permitted and proposed plans or projects within a 20km radius of the proposed development that have the potential to result in-combination effects on the receiving environment. The application was accompanied by several environmental reports that described and examined potential impacts and in-combination effects on the receiving environment (incl. population, air, climate,

noise, traffic, landscape, biodiversity & heritage). The main projects relate to the recently permitted solar farms which would operate in conjunction with the proposed substation and transmission lines. Having regard to the nature, scale and location of the various projects I am satisfied that adverse cumulative effects can be avoided, managed and mitigated by the embedded measures which form part of the proposed development, CEMP and TMP mitigation measures, adherence to best construction practice and any recommended conditions.

**Construction works:** The proposed works should be carried out in accordance with an agreed Construction Methodology and Environmental Management Plan.

**Conditions:** Any conditions recommended by Tipperary County Council should be attached as appropriate.

**Financial contributions:** Contributions are not normally required for substations and transmission lines.

## 6.7 Conclusion

Having regard to the examination of the planning and environmental information contained above, and in particular to the supporting documents and the submissions from the planning authority and prescribed bodies in the course of the application, it is considered that the main effects of the proposed development on the surrounding area and receiving environment have been identified in sections 6.0 to 6.6 of this report. It is considered that the proposed development would not give rise to any significant impacts, and the relatively minor planning and environment impacts are as follows.

- The ***risk of pollution of ground and surface waters during the construction phase*** through a lack of control of surface water during excavation and construction and the mobilisation of sediments and other materials during the excavation and construction works. The construction of the proposed project could also potentially impact negatively on ground and

surface waters by way of contamination through accidents and spillages. These impacts would be mitigated by the agreement of measures within a Construction and Environment Management Plan, and the implementation of mitigation measures related to control and management of sediments, accidental spills and contamination, and drainage management.

- The proposed project would give rise to a minor localised increase in **vehicle movements and resulting traffic impacts** during the construction phase. These impacts would be mitigated by the agreement of measures within a Construction and Environment Management Plan.
- The project could give rise to minor localised impacts on **residential amenity** during the construction (noise, dust, traffic safety & general disturbance) phase. These impacts would be mitigated by the implementation of measures related to the protection of air quality, control of noise and dust, traffic management, and the perimeter native species landscaping.

## 7.0 Screening for Environmental Impact Assessment

The applicant's Environmental Impact Assessment Screening Report concluded that the proposed development does not need to be subject to EIA and that no EIAR report is required for the proposed development. The project is not of a type included in Schedule 5 Part 1 or Part 2 of the Planning and Development Regulations 2001 (as amended). Furthermore, it does not meet any of the criteria set out in Schedule 7 of the Regulations for determining whether a sub-threshold development would be likely to have significant effects on the environment, with regard to the characteristics of the works, its location and the characteristics of potential impacts.

Having regard to the nature and scale of the proposed development, which would comprise the construction of a 110kV substation and overhead transmission cables, along with associated and ancillary works, and the characteristics of the receiving environment which is not densely developed, albeit within and proximate to areas covered by sensitive ecological and heritage designations, I am satisfied that the proposed works would not have any significant adverse effects on population and human health, biodiversity, land, soil or water, air and climate, material assets, cultural heritage or the landscape, and the need for environmental impact assessment can, therefore, be excluded.

Notwithstanding this conclusion, it is noted that the surrounding area has a rich cultural heritage related to the historical and ecclesiastical development of Roscrea, and the wider bog/woodland/riparian habitats that provide a refuge and foraging opportunities for a range of species (incl. otter, birds, bats & fish). As such the ecological mitigation measures contained in the NIS report should be fully implemented, pre-construction bat and otter surveys should be undertaken before works commence, and works should not take place during the bird nesting season.

## 8.0 Appropriate Assessment

### 8.1 Compliance with Articles 6(3) of the EU Habitats Directive

The Habitats Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) of this Directive requires that any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. The competent authority must be satisfied that the proposal will not adversely affect the integrity of the European site.

### 8.2 Natura Impact Statement

The application was accompanied by a Natura Impact Statement (NIS) which contained a Stage 1 Appropriate Assessment Screening and a Stage 2 Appropriate Assessment (AA). The report described the site, receiving environment (incl. habitats, species, watercourses & water quality) and the proposed development. It utilised the desktop data and specific field surveys for the proposed development and associated permitted solar farms.

The **AA Screening** identified 10 x European sites that have the potential to be affected by the proposed development within a 15km radius of the site:

River Barrow & River Nore SAC	Coolrain Bog SAC
River Nore SPA	Island fen SAC
Slieve Bloom Mountains SPA	Lisduff Fen SAC
Slieve Bloom Mountains SAC	Sharacogue Bog SAC
Knockacoller SAC	Kilduff, Devils Bit Mountain SAC

The **NIS** listed the Conservation Objectives, Qualifying Interests and Special Conservation Interests for each of these sites. It identified the potential sources of direct and indirect impacts on the sites and assessed the potential impacts relative to the Conservation Objectives for each site. All but 3 of the European sites were

screened out from further assessment because of the absence of an aquatic connection and/or suitable foraging habitat. The NIS had regard to a variety of water quality assessments and ecological surveys and concluded that the proposed development, will have no direct, indirect or cumulative impacts on the conservation status or integrity of any European site. The remaining sites comprise:

- River Barrow & River Nore SAC
- River Nore SPA
- Slieve Bloom Mountains SPA

### 8.3 AA Screening Assessment

No concerns were raised in relation to European sites and the main issues related to ecology are addressed section 6.6 which deals with Biodiversity. This section should be read in conjunction with this assessment.

The proposed development would not be located within a European site and it is not relevant to the maintenance of any European sites. There are 3 x European sites located within the Zone of Influence of the proposed (i.e. the area over which an impact can have a potential effect in relation to proximity of European sites and the mobility of faunal species from further afield sites). The Qualifying Interests and Special Conservation Interests, and approximate straight line and estimated aquatic separation distances from the project site to these European sites are listed below.

European site	Site code	QIs & SCIs	Separation distance	Link
River Barrow & River Nore SAC	002162	Estuaries & Reefs Mudflats & sandflats Salicornia & other annuals Atlantic & Mediterranean salt meadows Floating River Vegetation European dry heaths Tall herb fringe communities Petrifying springs	c.16km (E)	Aquatic via River Nore

		Old sessile oak woods Alluvial forests Desmoulin's Whorl Snail Freshwater Pearl Mussel & Nore Pearl Mussel White-clawed Crayfish Sea, Brook & River Lamprey Twaite Shad & Salmon Otter & Killarney Fern		
<b>River Nore SPA</b>	004233	Kingfisher	c.8km (E)	Mobile & aquatic via River Nore
<b>Slieve Bloom SPA</b>	004160	Hen harrier	c.3km (NE)	Mobile

**The potential effects relate to:**

- Transport of pollutants (incl. sediments & chemicals) in ground or surface water flowing into the European sites via on-site tributaries.
- Ex-situ impacts on QI species outside the European sites but which are an integral and connected part of the population of qualifying interest species.
- Loss of foraging lands for mammals and interference with flight lines of bird species associated with the European sites.

Two of the European sites should be screened in for further assessment because of their proximity to the proposed development and associated construction works, the nature of the European site, the presence of an aquatic connection, and the location of the project within the maximum foraging range for SCI species (River Nore SPA & Slieve Bloom Mountains SPA). The River Barrow & River Nore SAC does not require any further consideration because of the substantial distance between the development and the W boundary of this European site. Although the site drains S to the Rive Nore over a distance of c.600m, the upper section of the river is not covered by the SAC designation which occurs c.16km downstream. It is also noted from the NPWS Maps that most of the QI habitats and species are either not located within the upper reaches of the SAC, or they are located further downstream of where the designation commences.



## AA Screening Conclusion

In conclusion, having regard to the nature and scale of the proposed development, the proximity of the project to the European sites, to the nature of the qualifying interest habitats and species, and the special conservation interest species, and the conservation objectives of the European sites, and to the available information as presented in the supporting documents regarding ground and surface water pathways and mobile connections between the project and the European sites, and other information available, it is my opinion that the proposed development has the potential to affect 2 x European sites having regard to the conservation objectives of the relevant sites, and that progression to a Stage 2 AA is required.

### 8.4 Appropriate Assessment

The relevant details for the two remaining European sites within the Zone of Influence of the proposed development are summarised below:

Site name	Conservation Objectives	SCIs	Attributes & targets
<b>River Nore SPA (004233)</b>	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests.	Kingfisher	None specified.
<b>Slieve Bloom Mountains SPA (004160)</b>	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests.	Hen harrier	None specified.

#### Favourable Conservation Status is achieved when:

##### 1. Habitats

- The natural range (and area covered) is stable or increasing.
- The specific structure and functions which are necessary for its long-term maintenance exist now and for the foreseeable future.
- The conservation status of its typical species is favourable.

##### 2. Species

- Population dynamics data indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats.
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future.
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

### **River Nore SPA and Slieve Bloom Mountains SPA:**

These European sites lie within the Zone of Influence of the proposed works as they have a mobile and/or aquatic connection.

#### ***European site descriptions:***

The River Nore SPA is a long, linear site that extends from Borris-in-Ossory in Co. Laois to Coolnamuck in Co. Kilkenny, the site includes the river channel and marginal vegetation and is designated for Kingfisher. A 2010 survey recorded 22 pairs of Kingfisher within the SPA. The W boundary of this site is located c.8km to the E of the proposed development.

The Slieve Bloom Mountains SPA is situated on the border between Counties Offaly and Laois and it is a special conservation interest for Hen Harrier. It is one of the strongholds for Hen Harrier in the country, a 2005 survey recorded eight pairs, whereas eleven pairs had been recorded in the 1998-2000 period, and the 2005 numbers represent c.3.7% of the all-Ireland total. The mix of forestry and open areas provides optimum habitat conditions for this rare bird, which is listed on Annex I of the E.U. Birds Directive. The early stages of new and second-rotation conifer plantations are the most frequently used nesting sites, though some pairs may still nest in tall heather of unplanted bogs and heath. Hen Harriers will forage up to c.5km from the nest site, utilising open bog and moorland, young conifer plantations and hill farmland that is not too rank. The SW boundary of this site is located c.3km to the NE of the proposed development.

**Potential direct effects:** The proposed development would not be located within a European site and it is not relevant to the maintenance of any European site. No potential for direct effects having regard to the location and scale of the proposed development and to the separation distance between the works and the SCI species.

#### **Potential indirect effects:**

There is potential for indirect effects on these European sites and their SCI species during the **construction phase** as a result of loss of and disturbance to foraging grounds and/or nest locations (Kingfisher & Hen harrier). Water pollution from the unmitigated release of fine sediments during construction works and hydrocarbons

by way of accidental spillages from machinery could give rise to water pollution in River Nore c.600m to the S of the site, chemical contamination and clogging of fish gills, with resultant impacts on the availability of prey biomass for the SCI species (Kingfisher). Further potential indirect effects relate to the uncontrolled introduction of invasive species from works vehicles could give rise to the colonisation of habitats by invasive species, with resultant impacts on the riparian habitats frequented by the SCI species, in the absence of mitigation. There is some potential for indirect adverse effects during the **operational phase** when the works are complete as a result of bird collisions with overhead cables.

**Mitigation measures:** The NIS mitigation measures, which would serve to protect the sites and their SCI species from adverse effects, include: -

- CEMP & adherence to best construction practices.
- Biodiversity Habitat Enhancement Plan.
- Erection of 15m buffer zones around watercourses.
- Timing, seasonality & weather dependency of works.
- Appointment of Project Ecologist & on-going monitoring
- Surface water management measures to protect water quality including:
  - no concrete mixing, refuelling or washing out on site,
  - waste management plan & off-site waste disposal,
  - protection of all watercourses from contamination.

**Kingfisher:** The surrounding watercourses provide suitable nesting and foraging habitat for this species for which the River Nore SPA has been designated. The reports did not record the presence of this species within the site and environs during the walkover surveys. Pre-construction surveys should be undertaken along the River Nore and its tributaries before works commence and if a nest is identified a 500m buffer should be provided around the nest until it has been vacated. Bird deterrents should be fitted to the overhead cables to avoid collisions. Any loss of foraging habitat or diminution of water quality would be mitigated by the measures contained in the CEMP, and Biodiversity Habitat Enhancement Plan. This species would gradually habituate to the area post construction, with no adverse long-term impacts are anticipated.

**Hen Harrier:** The surrounding area does not provide suitable nesting and/or foraging habitat for this species for which the Slieve Bloom Mountains SPA has been designated. However, it is possible that Hen harrier occasionally forages in the area given that the project site lies within the core foraging range for this species. The reports did not record the presence of this species within the site and environs during the walkover surveys. Pre-construction surveys should be undertaken within the site before works commence and if a nest is identified a 500m buffer should be provided around the nest until it has been vacated. Bird deterrents should be fitted to the overhead cables to avoid collisions. Any loss of cut-over bog foraging habitat would be mitigated by the measures contained in the Biodiversity Habitat Enhancement Plan. This species would gradually habituate to the area post construction, with no adverse long-term impacts are anticipated.

**Potential in-combination effects:** Potential indirect in-combination effects relate to damage to SCI species because of accidental spillages and sediment run off during the works, and the accidental introduction of invasive species by construction vehicles. This could give rise to pollution, contamination and/or colonisation with resultant impacts on water quality, fisheries, and the availability of prey species for Kingfisher, having regard to the various plans or projects in wider area (incl. renewable energy projects, agriculture, domestic & industrial discharges and recreation) in the absence of mitigation. However, having regard to the implementation of the aforementioned mitigation measures and recommended conditions (see below), I am satisfied that there would be no adverse cumulative effects on the European sites or their SCI species.

**Suggested conditions:** Avoid vegetation clearance during the bird nesting season. Bird deterrents should be fitted to the overhead cables. The IFI “Guidelines on protection of fisheries during construction works in and adjacent to waters” should be required. All plant and machinery used during the works should be thoroughly cleaned and washed before delivery to the site to prevent the spread of hazardous invasive species and pathogens.

**Conclusion:** I am satisfied that the proposed development individually or in combination with other plans or projects would not adversely affect the integrity of these European sites in light of their Conservation Objectives, subject to the implementation of mitigation measures outlined above.

**Other European sites:**

It is noted that several other SPAs, which have been designated for their importance for a variety of bird species, are located well outside the core foraging range for the designated species.

**Conclusion:**

In relation to the **NIS**, I am satisfied that the applicant has described the receiving environment, identified the European sites within the Zone of Influence, and provided sufficient information to assess potential effects during the construction and operational phases on the Qualifying Interest and Special Conservation Interest habitats and species before and after the implementation of mitigation measures. I am satisfied that the NIS was informed by relevant and robust desktop and site surveys and prepared in accordance with all relevant guidelines.

The proposed substation development and overhead cable connection will have no significant adverse effects (direct, indirect or in-combination) on the Conservation Objectives or Special Conservation Interests for the River Nore SPA (Site code 004233) or Slieve Bloom Mountains SPA (Site code 004160), or for any other European Site.

**8.5 Appropriate Assessment conclusion:**

I consider it reasonable to conclude on the basis of the information on the file, which I consider adequate in order to carry out a Stage 2 Appropriate Assessment, that the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of the European site Nos. 004233, 004160 or any other European site, in view of the site's Conservation Objectives.

## 9.0 Recommendation

Arising from my assessment of this planning application I recommend that planning permission should be granted for the proposed development for the reasons and considerations set down below, and subject to the attached conditions.

## 10.0 Reasons and Considerations

Having regard to:

- a. The National Planning Framework – Ireland 2040,
- b. The Southern Regional Spatial and Economic Strategy, 2020,
- c. The Government of Ireland Climate Action Plan, 2021,
- d. The policies of the planning authority as set out in the Tipperary County Development Plan 2022-2028,
- e. The distance to dwellings or other sensitive receptors,
- f. The submissions made in connection with the application,
- g. The likely consequences for the environment and the proper planning and sustainable development of the area in which it is proposed to carry out the proposed development and the likely significant effects of the proposed development on European Sites,
- h. The report and recommendation of the Inspector.

### **Proper planning and sustainable development:**

It is considered that subject to compliance with the conditions set out below the proposed development would accord with European, national, regional and local planning and related policy, it would not have an unacceptable impact on the landscape or ecology, it would not seriously injure the visual or residential amenities of the area or of property in the vicinity, and it would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

### **Appropriate Assessment:**

The Board agreed with the screening assessment and conclusion carried out in the Inspector's report that the River Nore Special Protection Area Site code 004233 and the Slieve Bloom Mountains SPA Site code 004160 are the only European sites for which there is a possibility of significant effects and must therefore be subject to Appropriate Assessment.

The Board considered the Natura Impact Statement and all other relevant submissions and carried out an appropriate assessment of the implications of the proposed development for European Sites in view of the site's Conservation Objectives for the River Nore Special Protection Area Site code 004233 and the Slieve Bloom Mountains SPA Site code 004160. The Board considered that the information before it was sufficient to undertake a complete assessment of all aspects of the proposed development in relation to the site's conservation objectives using the best available scientific knowledge in the field.

In completing the assessment, the Board considered, in particular, the following:

- (i) Site Specific Conservation Objectives for these European Sites,
- (ii) Current conservation status, threats and pressures of the qualifying interest features,
- (iii) likely direct and indirect impacts arising from the proposed development both individually or in combination with other plans or projects,
- (iv) mitigation measures which are included as part of the current proposal,

In completing the AA, the Board accepted and adopted the Appropriate Assessment carried out in the Inspector's report in respect of the implications of the proposed development on the integrity of the aforementioned European Sites, having regard to the site's Conservation Objectives. In overall conclusion, the Board was satisfied that the proposed development would not adversely affect the integrity of European sites in view of the site's Conservation Objectives and there is no reasonable scientific doubt as to the absence of such effects.

## 11. Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

**Reason:** In the interest of clarity.

2. The mitigation measures identified in the CEMP, NIS and other plans and particulars submitted with the planning application, shall be implemented in full by the developer, except as may otherwise be required in order to comply with the conditions of this permission.

**Reason:** In the interest of clarity and protection of the environment during the construction and operational phases of the proposed development.

3. The developer shall comply with the following general requirements:

- (a) No additional artificial lighting shall be installed or operated on site unless authorised by a prior grant of planning permission.
- (b) CCTV cameras shall be fixed and angled to face into the site and shall not be directed towards adjoining property or the road.
- (c) Each fencing panel shall be erected such that for a minimum of 300 millimetres of its length, its bottom edge is no less than 150 millimetres from ground level.
- (d) Interconnecting cables within the substation site shall be located underground.

**Reason:** In the interest of clarity, of visual and residential amenity, to allow wildlife to continue to have access to and through the site, and to minimise impacts on drainage patterns and surface water quality.



4. The developer shall comply with the following additional nature conservation requirements:
  - a. No felling or vegetation removal shall take place during the period 1<sup>st</sup> March to 31<sup>st</sup> August.
  - b. The developer shall comply with the Inland Fisheries Ireland publication “Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters”.
  - c. A pre-construction mammal survey shall be carried out by a suitably qualified ecologist to check for the presence of any protected species (incl. otter, birds and bats).
  - d. Any destruction of bat roosting sites or relocation of bat species shall be carried out by a suitably qualified ecologist under a Derogation Licence granted by the Minister for Housing, Local Government and Heritage.
  - e. Bird deterrents shall be installed along the overhead transmission cables.

**Reason:** In the interest of biodiversity and nature conservation.

5. The landscaping proposals shall be carried out within the first planting season following commencement of construction of the proposed development. All existing hedgerows (except at access track openings) shall be retained. The landscaping and screening shall be maintained at regular intervals. Any trees or shrubs planted in accordance with this condition which are removed, die, become seriously damaged or diseased within two years of planting shall be replaced by trees or shrubs of similar size and species to those original required to be planted.

**Reason:** To assist in screening the proposed development from view and to blend it into its surroundings in the interest of visual amenity.

6. Water supply and drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of Irish Water and the planning authority for such works and services as appropriate.

**Reason:** In the interest of public health and to ensure a proper standard of development.

7. The developer shall comply with the transportation requirements of the planning authority for such works and services as appropriate.

**Reason:** In the interest of traffic and pedestrian safety.

8. The construction of the development shall be managed in accordance with a final Construction and Environmental Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall provide details of intended construction practice for the development, including hours of working, noise management measures, traffic management, protection of wayleaves, an invasive species management plan and off-site disposal of construction /demolition waste.

**Reason:** In the interests of public safety and residential amenity.

9. Site development and building works shall be carried out only between the hours of 0800 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

**Reason:** In order to safeguard the residential amenities of property in the vicinity.

10. The site development and construction works shall be carried out such a manner as to ensure that the adjoining roads are kept clear of debris, soil and other material and cleaning works shall be carried on the adjoining public roads by the developer and at the developer's expense on a daily basis.

**Reason:** To protect the residential amenities of property in the vicinity.

11. The preservation, recording and protection of archaeological materials or features that may exist within the site shall be facilitated. In this regard, a suitably-qualified archaeologist shall be retained to monitor all site investigations and other excavation works and provide arrangements for the

recording and for the removal of any archaeological material considered appropriate to remove.

**Reason:** In order to conserve the archaeological heritage of the site and to secure the preservation and protection of any remains that may exist within the site.

12. Prior to commencement of development, the developer shall lodge with the planning authority a bond of an insurance company, a cash deposit, or other security to secure the provision and satisfactory completion of the development, coupled with an agreement empowering the planning authority to apply such security or part thereof to the satisfactory completion of any part of the development.

**Reason:** To ensure the satisfactory completion of the development.

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Karla Mc Bride

Senior Planning Inspector

30<sup>th</sup> September 2022