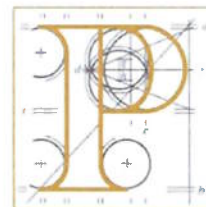


Our Case Number: ABP-318505-23



An
Bord
Pleanála

Department of Housing, Local Government and Heritage
Newtown Road
Wexford
Co. Wexford
Y35 AP90

Date: 24 January 2024

Re: Proposed construction of a 110kV underground grid connection cable connecting the permitted Carrownagowan windfarm to the existing 110kV substation at Ardnacrusha.
Within the townlands of Caherhurly, Killokennedy, Cloongaheen West, Leitrim, Castlebank, Ballykeelaun, County Clare. (www.carrownagowangridplanning.ie)

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email sids@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,

Lauren Murphy
Executive Officer
Direct Line: 01-8737275

VA11

Teil	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Lauren Murphy

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Thursday, January 18, 2024 3:21 PM
To: LAPS
Cc: SIDS
Subject: Futureenergy Carrownagowan DAC Strategic Infrastructure Development
Attachments: SID-CL-2023-040.pdf

Your Ref: ABP-318505-23
Our Ref: SID-CL-2023-040

Dear Sir/Madam,

Please find attached heritage-related observations/recommendations for the above mentioned Strategic Infrastructure Development application.

Regards,

Brian Bone
Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage

Aonad na nIarratas ar Fhorbairt
Development Applications Unit

Oifigí an Rialtais, Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90
Government Offices, Newtown Road, Wexford, Co Wexford, Y35 AP90



Your Ref: ABP-318505-23

Our Ref: SID-CL-2023-040

(Please quote in all related correspondence)

18 January 2024

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email to: laps@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Proposed Strategic Infrastructure Development (SID): Proposed grid route connection from the permitted Carrownagowan Wind Farm (ABP-308799-20) substation to the existing 110kV substation at Ardnacrusha, Co Clare

A chara,

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated headings.

Archaeology

It is noted that the EIAR (Environmental Impact Assessment Report) submitted as part of the planning application incorporates a desk-based Archaeological Impact Assessment, which was carried out in relation to the proposed development by IAC Ltd (EIAR Chapter 10; dated November 2023). The Department has reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.

Therefore, the Department advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C5 and C6 as set out in *OPR Practice Note PN03: Planning Conditions* (October 2022), with



appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

Archaeological Requirements:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 10 of the EIAR (IAC Ltd; dated November 2023) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 10 of the EIAR (IAC Ltd; dated November 2023 and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.
3. The planning authority and the National Monuments Service of the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

Nature Conservation

These observations are intended to assist you in relation to identifying potential impacts on European sites, other nature conservation sites, and biodiversity and environmental protection in general, in the context of the current proposal.

Site-specific conservation objectives are available for the Glenomra Wood Special Area of Conservation (SAC) (Site Code: 001013) at https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO001013.pdf (2018), contrary to the screening report, which states “*Specific site Conservation Objectives (COs) have not been prepared for Glenormra Wood SAC, generic COs are available*”. The Conservation Objective is “To maintain the



favourable conservation condition of Old sessile oak woods with Ilex and Blechnum in the British Isles in Glenomra Wood SAC".

The screening document correctly states "*Glenomra Wood SAC qualifying interest is sensitive to pressures and threats such as invasive alien species*", but does not screen this in. The only potential impact considered further is "*Surface water runoff and discharges from construction working areas including occasional pumping in order to dewater excavations*". The potential for invasive species to be introduced during construction should be considered further.

In Section 3 of the CEMP, "Site Description", it states "*The Proposed Development is not located within an SAC*". This is incorrect and should be updated for clarity. Part of the road within the Glenamora SAC is located within the SAC boundary, as stated correctly in the Biodiversity chapter "*Approximately 350m of the public road is encompassed within the SAC boundary*".

The Department recommends pre-construction Otter surveys in all suitable foraging/breeding habitat impacted by the works.

"There is potential for loss of treeline habitat turning north at chainage 17500m for a maximum for 30m." Bat roost suitability needs to be considered prior to the removal of any mature tree.

"The area of degraded upland blanket bog that will be directly impacted (lost) at the northern extent of the Proposed Development site will be minimised by marking out the area where works area to take place with stakes and fencing to prevent access beyond this area." Previous scoping observations by the Department states that The National Biodiversity Action Plan aims to conserve and restore Ireland's biodiversity. A key objective of the plan is to achieve no net contribution to biodiversity loss arising from development projects occurring within the lifetime of the plan. Accordingly, the EIAR should outline how this project will avoid a net loss of biodiversity.

The Department takes this opportunity to remind An Bord Pleanála of their obligations under Article 6 of the Habitats Directive (92/43/EEC). Competent national authorities, are to authorise activity only if they have made certain that it will not adversely affect the integrity of a European site and, consequently, not likely to give rise to deterioration or significant disturbances within the meaning of Article 6(2). Any matters raised above should also be considered in the planning policy context for the proposed development, including the



protective natural heritage and biodiversity objectives and policies in Clare County Development Plan.

In the event that additional heritage-related observations become available before the deadline date, a further letter will issue.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: manager.dau@npws.gov.ie

Is mise, le meas,

A handwritten signature in blue ink, which appears to read 'Julie Sullivan', is written above a horizontal line.

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration