

Sinead White

From: LAPS
Sent: Thursday 4 December 2025 15:19
To: SIDS
Subject: FW: SID application SID-GE-2024-010,
Attachments: SID-GE-2024-010.PDF

Categories: Sinead White

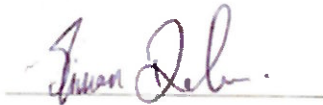
From: Simon Dolan (Housing) <Simon.Dolan@npws.gov.ie>
Sent: Thursday, December 4, 2025 3:06 PM
To: LAPS <laps@pleanala.ie>
Cc: Julie Sullivan (Housing) <julie.sullivan@npws.gov.ie>
Subject: SID application SID-GE-2024-010,

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A Chara,

Attached please find the Archaeological & Nature Conservation recommendations.

Regards,



Simon Dolan

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage
Executive Officer
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigi an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

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



Planning Ref: ABP-319307-24

(Please quote in all related correspondence)

04th December 2025

Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email: laps@pleanala.ie

Re: Notification to the Minister for Housing, Local Government and Heritage under the Planning and Development Act, 2000, as amended.

Proposed Development: SID application renewable energy development will comprise the construction of 8 No. wind turbines and all associated infrastructure and works in Laurclavagh, Galway.

A chara

I refer to correspondence received in connection with the above. Outlined below are the Heritage related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

The Department considers that the original comments made on the application by this Department have not been addressed by the further information provided. The Department maintains the view that the potential collision mortality impacts, caused by the proposed development, on Black-headed gull during the breeding season, should be contextualised in the context of the breeding population associated with the Lough Corrib SPA (or more specifically any breeding colonies within that SPA that are within foraging range of the proposed application). The Department doesn't agree with the approach taken in the revised Natura Impact Statement (NIS) where the collision mortality impacts are contextualised only in terms of a county population. Similarly, the Department maintains that any other wind farms, both built or proposed, that occur within the foraging range of the breeding Black-headed gull population associated with Lough Corrib SPA should be considered additively. If no such additive mortality impacts occur this should be made clear in any NIS to inform its conclusions with reference to any relevant data provided in the ornithological assessments for the other wind farms.

Aonad na nIarratas ar Fhorbairt

Development Applications Unit

Oifigí an Rialtais

Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90

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During the breeding season Black-headed gull do not have a widespread homogenous distribution. In the Lough Corrib SPA the species has breeding colonies on a small number of lake islands. There are 2 primary colonies, one of which is approximately 10km from the proposed development. Black-headed gull are known to have a high natal and breeding philopatry (i.e. they return to reproduce in the same colony and area)¹. Consequently, as this species is long lived, with a low adult mortality rate, breeding colony immigration rates are typically low. As such the Department considers that any projected mortality impacts on such Black-headed gull colonies that occur during the breeding season, and within the foraging range of the adult birds from the breeding colony, should be considered in the context of that population.

During the breeding season this species is known to forage in both freshwater and terrestrial habitats in the vicinity of its breeding colonies. The mean maximum foraging range provided in the conservation objectives for the Lough Corrib SPA is 18.5km (see NPWS, 2023², Woodward et. al 2019³). Consequently, the Department recommends that birds recorded within this range from the breeding colonies on Lough Corrib, during the breeding season, should be considered to be associated with these breeding populations (unless evidence has been provided to demonstrate otherwise). The significance of any collision mortality impacts should then be contextualized in terms of the populations associated with any such breeding colonies and within the context of the Lough Corrib SPA and its conservation objectives.

An Coimisiún Pleanála should also consider that the results of the collision mortality model for the proposed development have not been expressed with any confidence interval (i.e. no margin of error has been provided). Consequently, it should be considered that any actual mortality effects on Black-headed gull from the proposed development is likely to occur within a margin of error around the exact figures provided (such margins of error are typically wider where small numbers of flights have been recorded). Small mortality effects, of a few individual adult breeding birds of a long lived species such as Black-headed Gull, may have an adverse effect on a declining colony population, which may prevent the species recovering to favourable conservation condition within the Lough Corrib SPA. An Coimisiún Pleanála should ensure that they have sufficient information to determine beyond reasonable doubt that any such effect does not occur as a result of the current proposal in relation to the Lough Corrib SPA.

An Coimisiún Pleanála has obligations under Article 6.3 of the Habitats Directive (92/43/EEC). Competent national authorities, are to authorise activity only if they have

¹ Piro, S., Schmitz Ornés, A. Nest site tenacity and mate fidelity in the Black-headed Gull (*Chroicocephalus ridibundus*). Avian Res 12, 63 (2021).

² NPWS (2023) Conservation Objectives: Lough Corrib SPA 004042. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

³ Woodward, I.; Thaxter, C. B.; Owen, E.; Cook, A. S. C. P, (2019), Desk-based revision of seabird foraging ranges used for HRA screening, BTO Research Report No. 724.



made certain that it will not adversely affect the integrity of a European site. That is the case when there is no reasonable scientific doubt as to the absence of such effects.

Archaeology

Underwater Archaeology:

The Department outlines underwater cultural heritage represented within the proposed development area may encompass riverine heritage structures and features that lie within rivers/streams and on their banks. In light of potential for the development to have adverse effects on underwater cultural heritage, a programme of preconstruction underwater archaeological assessment should be undertaken as follows: Submit an Underwater Archaeological Impact Assessment (UAIA) to include:

- Desktop assessment that addresses the underwater cultural heritage (including wrecks, archaeological objects, built heritage, riverine and industrial heritage) of the proposed development area.

The UAIA shall include a licensed dive/wade assessment accompanied by handheld metal detection survey centred on any area where works are proposed to the foreshore, to be undertaken by suitably licenced and experienced underwater archaeologist.

It is noted that the submission concludes that:

“Given the absence of watercourses within the Proposed Wind Farm site, the lack of instream works at any of the four water crossings on the Proposed Grid Connection underground cabling route and all associated works taking place in the public road network it is considered that an UAIA is not necessary for the Proposed Project. In light of the above no likely potential effects to underwater archaeological or cultural heritage items will occur as a result of the Proposed Project.”

In light of the above clarifications, the Department concurs that an UAIA is not required for the proposed project.

Should you require any further information or clarification on any of the above submission please do not hesitate to contact this Department.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie where used, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road



Wexford
Y35 AP90

Is mise, le meas

Julie Sullivan
Development Applications Unit
Administration