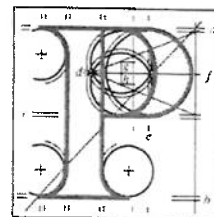


**Our Case Number:** ABP-320300-24



**An  
Bord  
Pleanála**

Developments Application Unit  
Newtown Road  
Wexford  
Co. Wexford  
Y35AP90

**Date:** 25 September 2024

**Re:** Proposed development of a Gas Insulated Switchgear (GIS) substation compound  
In the townlands of Carhoona, Carhoonakilla, Carhoonakineely, Cockhill, Coolnagoonagh,  
Farranawana, Kilcolgan Lower, Kilcolgan Upper, Kilpaddoge and Ralappane, County Kerry  
([www.STEP220kVConnection.com](http://www.STEP220kVConnection.com))

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](http://www.pleanala.ie).

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

Yours faithfully,

Ellen Moss  
Executive Officer  
Direct Line: 01-8737285

VA11

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaao Áitiúil</b>	<b>LoCall</b>	1800 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhride Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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Your Ref: ABP-320300-24  
Our Ref: **SID-KY-2024-026**  
(Please quote in all related correspondence)

23 September 2024

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

Via email to [laps@pleanala.ie](mailto:laps@pleanala.ie)

Re: Notification under Section 182A of the Planning and Development Act, 2000 (as amended).

**Proposed Strategic Infrastructure Development (SID): An EirGrid plc operated Gas Insulated Switchgear (GIS) substation compound (Glansillagh 220kV substation) within the townlands of Carhoona, Carhoonakilla, Carhoonakineely, Cockhill, Coolnagoonagh, Farranawana, Kilcolgan Lower, Kilcolgan Upper, Kilpaddoge and Ralappane, County Kerry.**

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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 Environmental Impact Assessment Report (EIAR) submitted as part of the planning application incorporates a desk-based Archaeological Impact Assessment (AIA) which was carried out in relation to the proposed development by Archaeological Management Solutions (EIAR Chapter 15; date July 2024).

In addition to a walkover survey, it is noted that the AIA has been informed by the results of Advance Archaeological Geophysical Survey and Advance Archaeological Test Excavation, though these advance investigations do not encompass all greenfield sections of the proposed development site (PDS).

It is noted that the proposed development will have indirect impacts on Recorded Monuments KE003-010001- (Souterrain) and KE003-009001- (Souterrain). These sites are subject to



statutory protection under Section 12 of the National Monuments (Amendment) Act 1930-2014. The incorporation of exclusion zones and appropriate vibration monitoring is proposed as part of the mitigation measures for the project to protect these monuments.

Therefore the Department advises that the following should be included as a condition of any grant of permission that may be issued. Note that these recommended conditions align with Sample Conditions C4 and C5 as set out in the *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 15 of the EIAR (Archaeological Management Solutions; date July 2024) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. A Project Archaeologist shall be appointed to oversee and advise on all aspects of the scheme from design, through inception to completion.
  - a. The Project Archaeologist shall liaise with the Department and the Planning Authority to agree in advance an overall strategy for archaeological works to be carried out both in advance of and in parallel with construction of the development.
  - b. This shall include the scope of any Advance Archaeological Geophysical Survey, Advance Test Excavation and Archaeological Monitoring as well as any additional mitigation measures that may be required to protect archaeological heritage.
  - c. This shall include the location, extent and method of demarcation for any Exclusion Zones around the external-most elements of vulnerable Heritage Assets that are to be preserved in situ (as identified in Chapter 15 of the EIAR or by any subsequent investigations associated with the project).
3. The Construction Environmental 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 15 of the EIAR (Archaeological Management Solutions; date July 2024) 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.



4. The Planning Authority and 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**

Although not within the Lower River Shannon Special Area of Conservation (SAC) (Site Code: 002165)<sup>1</sup>, nevertheless the proposed cable crosses two watercourses (Ralappane Stream and Farranawana Stream) which flow into this SAC, and which are likely to be utilised by otters.

**Lower River Shannon SAC: Effects on otter**

Otter is a species to which the Conservation Objectives of the Lower River Shannon SAC apply, and is also a strictly protected species listed in Annex IV of the EU Habitats Directive. It is likely that otters use the Stream in Glencloosagh, which approaches the north side of the L1010 road near the south-west of Kilpaddoge townland. This Stream is referred to as the Farranawana Stream in the Natura Impact Statement (NIS). A detailed map of the cable route in this area is given in Drawing no. 0017<sup>2</sup>. It is also likely that otters use the Ralappane Stream, further west.

The Triturus survey (Appendix 9.6) recorded European eel from both the western crossing of Ralappane Stream and from Farranawana Stream. Eels are an important prey item for otters, and although the downstream sections of both Streams near the coast were not surveyed, it is likely that otters will use both Streams to feed and wash (the latter is important in coastal areas due to the need to clean saline water from their fur).

The construction of concrete culverts has been observed to result in eel mortality, probably due to the leaching of alkali from hydrating cement<sup>3</sup>. Further research by Law and Setunge (2013)<sup>4</sup> concluded that "care should be taken when casting concrete structures in water where the volume of water and rate of flow are relatively low, such as in culverts and small streams." They also conclude that delaying the exposure to water may reduce the increase in pH of the exposed water.

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<sup>1</sup> Designated under the European Union Habitats (Lower River Shannon Special Area of Conservation 002165) Regulations 2023 (S.I. No. 328 of 2023). Conservation Objectives for this European Site are available at

<https://www.npws.ie/protected-sites/sac/002165>

<sup>2</sup> Drawing no. 229100682-MMD-04-XX-DR-E-0017.

<sup>3</sup> Setunge, S., *et al.* (2009) Leaching of alkali from concrete in contact with waterways. *Water, Air and Soil Pollution* 9: 381-389.

<sup>4</sup> Law, D.W. and Setunge, S. (2013) Effect of Leaching from freshly cast concrete on pH. *Magazine of Concrete Research* 65: 889-897.



It is understood that the L1010 road widening works are being carried out separately, and that no additional road widening will be necessary to facilitate the project at the southern apex of Glencloosagh (near the disused quarry, where the three townland boundaries meet) (see Drawing no. 0017<sup>2</sup>). However, it is not clear if further concrete pouring works are necessary at this area to facilitate the laying of the cable. In the absence of this information, it is assumed that they are, so a condition like that below is recommended.

Mitigation proposals relating to avoidance of siltation and pollution of watercourses (Tables 4.16 & 4.17 of the NIS) refer to an independent Environmental Clerk of Works, independent of the contractor's Environmental Clerk of Works. This is welcomed. However, the CIRIA guidance in both documents C648 & C649 should be used.

Recommended Condition:

Washing out of fresh cement from trucks will be carried out more than 50m from the Ralappane and Farranawana (Glencloosagh) Streams. Monitoring of the Ralappane and Farranawana (Glencloosagh) Streams, 20-50m below the works site, will be carried out for alkalinity, before, 1 hour after and 1 day after concrete pouring, by the Independent Environmental Clerk of Works, and the results communicated to Inland Fisheries Ireland (IFI) and to the Department as soon as available. Inspections of the two Streams below the works areas, during the construction period, by authorised officers of IFI and the Department will be facilitated when requested.

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](mailto:manager.dau@npws.gov.ie), or to the following address:

The Manager  
Development Applications Unit (DAU)  
Government Offices  
Newtown Road  
Wexford  
Y35 AP90

Is mise, le meas

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Julie Sullivan  
Assistant Principal  
Development Applications Unit  
Administration