

Our Case Number: ACP-322845-25



An
Coimisiún
Pleanála

Development Applications Unit
The Manager
Newtown Road
Wexford
Co. Wexford
Y35 AP90

Date: 18 August 2025

Re: Proposed development of 11 wind turbines and ancillary development within the townlands of Ballynamullagh, Kilmurry, Coolree, Killyon, Mulgeeth and Drehid, County Kildare (www.drehidwindfarmSID.ie)

Dear Sir / Madam,

An Coimisiún 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 Commission 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 Coimisiún Pleanála when they have been processed by the Commission.

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

If you have any queries in the meantime please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

PP DC

Lauren Murphy
Executive Officer
Direct Line: 01-8737275

PA09

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Lauren Murphy

From: LAPS
Sent: Thursday 14 August 2025 14:03
To: SIDS
Subject: FW: Your Ref: ACP-322845-25 Our Ref: SID-KD-2025-013
Attachments: ACP-322845-25.pdf

Categories: Lauren

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Thursday, 14 August 2025 13:48
To: LAPS <laps@pleanala.ie>
Subject: Your Ref: ACP-322845-25 Our Ref: SID-KD-2025-013

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A Chara,

Attached please find the archaeological and nature conservation observations/recommendations of the Department in relation to the aforementioned Strategic Infrastructure Development (SID) Planning Application for Drehid Windfarm in County Kildare.

Can you please confirm receipt of same?

Kind Regards,
Sinéad

—
Sinéad O' Brien
Executive Officer

—
Aonad na nIarratas ar Fhorbairt
Development Applications Unit

Oifigí 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



Your Ref: ACP-322845-25

Our Ref: **SID-KD-2025-013** (Please quote in all related correspondence)

14 August 2025

The Secretary
An Coimisiún 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): Development consisting of 11 no. turbines (and all associated works) in the townlands of Ballynamullagh, Kilmurry, Coolree, Killyon, Mulgeeth and Drehid, County Kildare

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 Environmental Impact Assessment Report (EIAR) submitted as part of the Planning Application includes a desk-based Archaeological Impact Assessment (AIA) which was carried out in relation to the proposed development by Courtney Deery Heritage Consultancy (EIAR Chapter 14; date May 2025).

The proposed development is located in proximity to a number of Recorded Monuments—located both within and without the redline boundary for the development—which are subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1930-2014. The EIAR also acknowledges that there is a potential that previously unknown sub-surface archaeological features or deposits may be present within the proposed development site (PDS) which may be negatively impacted by the proposed development. The Department notes that no advance archaeological investigations have been carried out within the PDS to inform the EIAR, other than a walkover survey. The Department advises that advance archaeological test excavation should be carried out in advance of any development to determine if previously unknown sub-surface archaeological features or deposits are present. If such material is present, then additional mitigation measures to ensure the preservation *in-situ* or preservation by record (i.e. full archaeological excavation) of such



discoveries will be necessary. The Department advises that this can be addressed by the inclusion of an appropriate condition, if the development is permitted.

Exclusion Zones may be necessary to protect vulnerable heritage assets located in proximity to the proposed development site (PDS) and ensure that they are safely preserved *in-situ* during the construction phase. In that regard, the Department notes in particular the close proximity of Recorded Monuments KD008-011001- (Ringfort – rath) and KD008-011002- (Souterrain) to the proposed location of Turbine 5 and its associated infrastructure. The Department notes that no express provision for Exclusion Zones to protect *in-situ* heritage assets has been included in the mitigation measures itemised in the EIAR. The Department advises that this can be addressed by the inclusion of an appropriate condition, if the development is permitted.

Further to this, the Department advises that similar measures may be required at decommissioning phase also and that the advice of a suitably qualified Archaeologist may be needed to inform any plan for decommissioning of the development in due course. The Department advises that this can be addressed by the inclusion of an appropriate condition, if the development is permitted.

The Department, therefore, advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C3, 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 14 of the EIAR (Courtney Deery Heritage Consultancy; date May 2025) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. In addition, the developer shall engage a suitably qualified Archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in areas of proposed ground disturbance and to submit an Archaeological Impact Assessment Report for the written agreement of the Planning Authority, following consultation with the National Monuments Service, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works. Please note the following:
 - a. The report shall include an Archaeological Impact Statement and Mitigation Strategy. Where archaeological material is shown to be present, avoidance, preservation *in-situ*, preservation by record (archaeological excavation) and/or monitoring may be required.



- b. Any further archaeological mitigation requirements specified by the Planning Authority, following consultation with the National Monuments Service, shall be complied with by the developer.
 - c. No site preparation and/or construction works shall be carried out on site until the Archaeologist's report has been submitted to and approval to proceed is agreed in writing with the Planning Authority.
 3. A suitably qualified Archaeologist shall be retained to advise on, and establish appropriate Exclusion Zones around the external-most elements of vulnerable Heritage Assets located within the development site (as identified in Chapter 14 of the EIAR or by any subsequent investigations associated with the project). Please note the following:
 - a. Exclusion Zones shall be fenced off or appropriately demarcated for the duration of construction works in the vicinity of the monuments. The location and extent of each Exclusion Zone and the appropriate methodology for fencing off or demarcating at each location shall be agreed in advance with the National Monuments Service and the Planning Authority.
 - b. No groundworks of any kind (including but not limited to advance geotechnical site investigations) and no machinery, storage of materials or any other activity related to construction will be permitted within Exclusion Zones.
 4. 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 14 of the EIAR 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.
 5. The applicant shall retain the services of a suitably qualified Archaeologist to advise on an Archaeological Mitigation Plan for decommissioning of the development, to include mitigation measures for the removal of the turbines and the protection of any archaeological sites and monuments that are *in-situ* at the site. The Decommissioning Plan shall be updated to include the location of any archaeological or cultural heritage constraints as set out in Chapter 14 of the EIAR and by any subsequent archaeological investigations associated with the project. It shall clearly describe all identified likely impacts from decommissioning—both direct and indirect—and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during decommissioning works.



6. 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

The following observations are intended to assist the Planning Authority in meeting obligations that may arise in relation to European Sites (Natura 2000 sites) in the context of the proposed development. In relation to European Sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)), the Department places particular emphasis in its observations on the level of detail contained in the Screening for Appropriate Assessment (AA) and Natura Impact Statement (NIS). An AA determination must contain complete, precise and definitive findings and conclusions with regard to the implications of a proposal for the Conservation Objectives and integrity of a European Site.

Matters relating to Appropriate Assessment

The Department notes that a NIS has been prepared as part of the planning application for the proposed windfarm, by Fehily Timoney. The Department notes the conclusion in the NIS that *"Taking cognisance of measures incorporated into the project design and mitigation measures to avoid effects that are considered in the preceding section, the proposed development works will not adversely affect the integrity of the River Boyne and River Blackwater SAC and River Boyne and River Blackwater SPA"*.

The Department advises that a condition be attached to planning (should permission be granted) that all mitigation measures outlined in the Natura Impact Statement (NIS) and all other relevant documents must be implemented in full.

Matters relating to Environmental Impact Assessment

Air quality

A reduction in air quality within the immediate vicinity of the construction works may occur as a consequence of dust deposition associated with construction activities. This includes reduction in photosynthesis due to smothering from dust on the plants and chemical changes such as acidity to soils.

Peatland and other sensitive habitats are located adjacent and within 50m of the proposed development boundary. The Department refers to The Institute of Air Quality Management (IAQM) and their guidance on the assessment of dust from construction (Holman, C. *et al.*



2014), and recommends that Further Information is provided on the potential for air quality impacts during construction on nearby sensitive habitats.

Bats

The Department acknowledges the detailed information provided on the surveys, potential impacts, and mitigation for local bat species within the Biodiversity Chapter. The Department notes that Turbines 6, 7, 8, 9, 10 and 11 are all proposed either within existing conifer plantation, bog woodland or mixed broadleaved/conifer woodland, which all therefore require bat felling buffers of 50m from the turbine blade tip. The felling of this woodland will create edge habitats that were not previously present during the surveys undertaken. Edge habitat is particularly suitable for pipistrelle bat species, which were identified in high numbers throughout the site. The Department is therefore concerned that the creation of this edge habitat will potentially guide bat species towards the turbines, therefore increasing the risk of collision/barotrauma. The following text is included in the Biodiversity Chapter "*Where bat buffers are applied, the surrounding hedgerows and treelines should act as commuting corridors, leading bats away from the turbine location*", it is not clear how this will guide bats away from the turbines, and not towards them, and no evidence is provided to support this statement. The Department recommends that Further Information is provided on this.

In addition, it is noted that five bat boxes are proposed within the windfarm site. Details on the specifics of the bat boxes are not provided, but Plate 8-41 "Example of a Bat Box" shows a wooden bat box. The Department recommends that wooden bat boxes are not used as they can easily decay and can be problematic due to the potential for chemical contamination from wood preservatives. Bat boxes made from durable materials such as woodcrete or ecostyrocete should only be used.

Surveys

It is noted that bird surveys were undertaken spanning multiple years between 2021–2023; however the Department wishes to remind the applicant of the CIEEM Advice Note on the Lifespan of Ecological Reports & Surveys¹. Baseline information on flora and fauna for EIAR (as per Schedule 6 of Planning and Development Regulations, 2001) is required and must be adequate.

In addition, the transect surveys undertaken within the proposed development, only actually covered a very small portion of the site, as shown on Figure 8.2. This represents a significant gap in the baseline surveys, and the Department recommends that reasoning is sought as to the rationale behind this limitation. If no rationale can be provided, further surveys should be undertaken within the entire site.

It is noted that only one activity barn owl survey was undertaken on the 26th-27th June 2023. The Department does not consider this sufficient in order to assess potential barn owl impacts, and this does not follow best practice guidance.

¹ <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>



Badgers

The proposed windfarm clearly supports a number of badger populations, as 21 different setts were identified. The Department notes the suite of mitigation measures proposed. The Department further recommends that during the breeding season (December to June inclusive), no works will be undertaken within 50m of active setts, nor blasting or pile driving within 150m of active setts.

The Department notes that recent evidence supports an Exclusion Zone of 150m as a minimum size for heavy machinery during the breeding season and advises that the Exclusion Zone is increased to this size for heavy machinery².

Red Squirrel

Red squirrel feeding signs were identified within the proposed windfarm site mostly in the conifer plantations, with *"a high concentration of feeding signs recorded"*. Significant negative effects as a result of the permanent loss of conifer plantation are ruled out however, as *"This habitat type is abundant in the greater area and therefore the resultant effect on foraging red squirrel is considered near certain to be a Long-term Slight Reversible effect at the Local scale"*. Whilst conifer plantation is present in the wider environs, the habitat within the proposed windfarm is mostly isolated from any other plantations, and the Red Squirrel population in this location may not be able to commute easily between suitable areas of woodland. Red Squirrels generally prefer a mix of coniferous and deciduous trees, and with the removal of 3.25ha of Mixed broadleaved/conifer woodland, 1.31ha of mixed conifer woodland, 0.65ha of mixed broadleaved woodland proposed, the Department is concerned that impacts on this species have not been fully addressed and mitigated for.

Habitat removal

The Department is concerned with the amount of habitat removal proposed within the windfarm development, particularly of woodland habitat. Whilst replanting is proposed and it is stated that no mature broadleaves will be felled, the following is included in Section 8.7.3.1.25 *"The oak treeline is entirely within the T11 bat felling buffer, and another section of treeline in agricultural land is within the T1 felling buffer"*. Mature oak (or other broadleaves) should be avoided as much as possible. These trees take a long time to mature and cannot be easily replanted. Any planting that is proposed should occur at an early stage of the construction phase, ideally prior to any vegetation removal. All hedgerow and tree planting stock should be native species of local provenance or if unavailable national provenance (as per Table 15.1 (a, b and c) of the Kildare County Development Plan 2023-2029. Origin and provenance have the meaning given in the UK National Plant Specification.

Birds

The Department also recommends that a condition is attached to planning that all vegetation removal works will be scheduled outside the nesting bird season, which is between 1st March and 31st August.

²Mullen, E. et al. (2019) How Effective are Forestry Guidelines at Protection Badgers and Their Setts During Clearfelling? Lessons from Ireland. In Practice Issue 103 March 2019 CIEEM



Lighting

The following text is included in Chapter 8.2 – Ornithology “*Certain turbines will be illuminated with medium intensity fixed red obstacle lights of 2000 candelas where required by the IAA Lighting will be fitted with baffles to ensure that the light is directed skywards and will not be discernible from the ground*”. White (or green) lights are believed to be less attractive to birds than red lights, which may affect nocturnal migrant navigation. The lighting design should consider best practice guidance, such as the recently published NatureScot Information Note on the Effects of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures³. A number of mitigation options exist and these are listed in this guidance and must be considered in relation to the proposed development.

Mitigation measures

It is advised that a schedule collating all mitigation measures is produced as part of the Construction Environmental Management Plan and agreed with the Local Authority prior to commencement of any works. It is further advised that an appropriately qualified Ecologist is retained as an Ecological Clerk of Works during any operations and that a post-operation Mitigation Compliance Report is produced by the Ecological Clerk of Works and submitted to the Local Authority for review.

You are requested to send any further communications to this Department’s Development Applications Unit (DAU) at 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

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration

³ <https://www.nature.scot/sites/default/files/2020-10/Wind%20farm%20impacts%20on%20birds%20-%20Turbine%20lighting%20and%20birds%20-%20Information%20Note.pdf>