



Your Ref: ACP-323579-25

Our Ref: SID-OY-2025-021 *(Please quote in all related correspondence)*

24 October 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): Proposed Wind Energy Project
- Ballinla Wind Farm within the townlands of Leitrim, Ballyfore Big, Ballyleakin and
Ballina (Geashill By), County Offaly**

A Chara

I refer to correspondence received in connection with the above.

Outlined below are archaeological observations/recommendations of the Department.

It is noted that the Environment 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 Maurice Hurley Consultant Archaeologist (EIAR Chapter 12; date July 2025). The Department notes that no advance archaeological investigations have been carried out within the proposed development site (PDS) to inform the EIAR, other than a Walkover Survey.

The proposed development is located in proximity to a number of Recorded Monuments 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 generalised potential that previously unknown sub-surface archaeological features or deposits may be present within the PDS, which may be negatively impacted by the proposed development. The Department advises that advance Archaeological Geophysical Survey and 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.



However, issues of particular concern remain unresolved in relation to:

1) **Indirect impacts to the setting of National Monuments and Recorded Monuments:**

The study area for the AIA as set out in Chapter 17 of the EIAR is poorly defined and may not be of sufficient size to adequately assess the possible effects of the proposed development on the wider archaeological landscape. Despite the scale and character of the development, the potential for effects to that wider landscape has been discounted with no obvious foundation (see EIAR Section 12.5.2).

2) **Cumulative impacts to the archaeological and cultural heritage environment:**

Due to their exclusion from the AIA (see Point 1) the potential Cumulative Impacts of this proposed development to the setting of National Monuments and Recorded Monuments has not been evaluated. Section 12.5.4 of the EIAR discounts the potential for cumulative impacts to archaeological heritage with no supporting rationale.

Due to the scale and character of wind farm developments, it is generally accepted that they have a potential for wider effects in the landscape. The current Wind Energy Guidelines (2006) advise that:

- For blade tips in excess of 100m, a Zone of Theoretical Visibility radius of 20km would be adequate (this is twice conventional thresholds and reflects greater visibility of higher structures).
- In areas where landscapes of national or international renown are located within 25 km of a proposed wind energy development, the Zone of Theoretical Visibility should be extended as far (and in the direction of) that landscape. This reflects the fact that highly sensitive landscapes deserve extra special treatment by developers and planners

The Zone of Theoretical Visibility (ZTV) prepared for this proposal extends out to 20km from the PDS (EIAR Figure 11-5; Appendix 11-2). While the limitations of ZTV are acknowledged, Section 11.3.4.1 of the EIAR notes that there is a very consistent level of potential visibility out to 5km, with more sporadic visibility only emerging out past 10km (where there is much greater topographic screening of the development). This would suggest a potential for indirect impacts (visual impacts/impacts to setting) could reasonably extend up to 10km from the PDS.

This potential vulnerability to impact is not reflected in the methodology adopted for the assessment of potential effects to archaeological heritage in Chapter 12 of the EIAR. No specific study area for the assessment of the wider landscape effects of the development is defined in the chapter. By reference to the 'distance to nearest element' for each asset listed in Table 12.1, for example, a study area of c. 2-2.5km can be inferred. The chapter does not discuss the potential for indirect effects even to these monuments in relatively



close proximity. Section 12.5.2 dismisses the potential for indirect effects in a very cursory manner with no substantive assessment. There is no discussion of any of the findings from the Landscape and Visual Impact Assessment (LVIA) for the project and there is no integration between the LVIA and AIA. As noted, the ZTV drawings (EIAR Figure 11-5; Appendix 11-2) indicate potential visibility for all proposed turbines extends across an area from 5-10km out from the redline boundary. While acknowledging that ZTV analysis does not include many screening factors such as existing buildings or landscape planting, the stark contrast between the limited study area for the archaeological and cultural heritage environmental baseline and that potential extent of the area where impacts to setting of vulnerable receptors (i.e. visual impacts) could occur is concerning. An Environmental Impact Assessment (EIA) for a scheme of this type must include an adequate assessment of the possible effects of the proposal on the wider archaeological landscape. It is of importance, therefore, that the study area should be of sufficient size and extent to support this.

In this regard, the Department notes that there are three National Monuments in the Ownership or Guardianship of the Minister located within c. 10km of the PDS:

- Grange Castle (NM629; KD002-007----
- Clonin Ring-Barrow (NM532; OF011-001----
- Cannakill Deserted Settlement (NM617; OF010-010001-)

These monuments are subject to statutory protection under Section 14 of the National Monuments Act 1930-2014. Potential for impacts to the setting of Cannakill Deserted Settlement can be discounted, as ZTV mapping indicates that it is in a location where visibility of turbines should be fully screened by natural topography. However, the two other sites are at locations where potentially all turbines could be visible and cumulative impacts to setting could also occur as a result of other proposed/permitted wind farm developments based on the provided ZTV mapping. Clonin Ring-Barrow is particularly vulnerable to impacts on setting as it is located at the top of Clonin Hill, c. 3.5km NNW of the PDS, with extensive views of the surrounding countryside, including of other prehistoric monuments in the general area.

In addition, the Department's review of the wider landscape of the scheme indicates the present of a number of Recorded Monuments within 10km of the PDS that would potentially be particularly vulnerable to impacts on setting due both to the character of the Monument itself and its position within the landscape and in relation to other monuments in the landscape. For example, Standing Stone (OF011-002----), Mound (OF011-003----) and Ring-Barrow (OF011-055----) are all located on a ridge of high ground c. 2.5km to the north of the PDS. A Hilltop Enclosure (OF010-017----) is located c. 6km to the northwest of the PDS. Croghan Hill (referred to in Irish mythology and early historic sources as Brí Éile) is located c. 8km to the northwest of the PDS; a Bowl-Barrow (OF010-004001-) is located on



the summit with a number of other monuments of prehistoric and early historic date located on the lower slopes. All of these sites are at locations where potentially all turbines could be visible and cumulative impacts to setting could also occur, as a result of other proposed/permitted wind farm developments.

The LVIA for the project (EIAR Chapter 11; Appendix 11-1) does include an assessment of visual impact at Croghan Hill as a scenic view and a photomontage is available (VP29). While it does not assess/address the specific vulnerabilities that may be present within the archaeological and cultural heritage environment it does confirm that turbines are likely to be visible and predicts a moderate-slight, long-term, negative effect. There is no discussion of this in Chapter 12 to contextualise its potential relevance to the specific archaeological and cultural heritage landscape context.

The LVIA does address cumulative impacts at Section 11.2.10 (incorporating seven other proposed or permitted wind energy developments as listed at Table 11.11), but only in terms of the more general landscape considerations. It does not assess/address the specific vulnerabilities that may be present within the archaeological and cultural heritage environment. It is not clear if the likely cumulative effects of this proposed development to the archaeological and cultural heritage environment have been adequately evaluated.

If Further Information is being requested by the Board, it may be beneficial to consider including clarification of the aforementioned points as part of the request.

Notwithstanding this, 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 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 12 of the EIAR (date July 2025) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The developer shall engage a suitably qualified Archaeologist (licensed under the National Monuments Acts) to carry out a pre-development Archaeological Geophysical Survey and a pre-development Archaeological Test Excavation of the development site for all greenfield sections of the development 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.
 - a. The Archaeological Geophysical Survey must be carried out under licence from the National Monuments Service or Ministerial Consent (as applies)



and in accordance with an approved Method Statement. Having completed the work, the Archaeologist shall submit a written report to the Department and to the Planning Authority describing the results of the Archaeological Geophysical Survey.

- b. The Project Archaeologist shall liaise with the National Monuments Service (NMS) to establish—based on the results the Archaeological Geophysical Survey—the appropriate scope of the Archaeological Test Excavation to adequately characterise the character and extent of any potential sub-surface archaeological material within the development site.
 - c. The report on the Archaeological Test Excavation 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.
 - d. Any further archaeological mitigation requirements specified by the Planning Authority, following consultation with the National Monuments Service, shall be complied with by the developer.
 - e. 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. 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 12 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.
 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.



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:

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

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration

