



**Planning Ref: ACP- 323761-25**  
(Please quote in all related correspondence)

30 October 2025

Secretary  
An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

Via email: [laps@pleanala.ie](mailto: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 for Construction of wind energy development and all associated works located within Cloondahamper, Cloonascragh, Elmhill, Cooloo, Lecarrow, Dangan Eighter, Lissavally and Slievegorm, Co.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**

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.

The following should be considered by the competent authority in relation to the proposed Cooloo windfarm application:

The proposed windfarm area (and adjacent lands) within townlands Cloondahamper, Cloonascragh, Elmhill, Cooloo, Lecarrow, Dangan Eighter, Lissavally and Slievegorm, Co.Galway are high in biodiversity value, and key ecological receptors are summarised below:

- The North of the proposed windfarm is adjacent to the Lough Corrib SAC, with one river crossing on the Grange River falling within the SAC.

### **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



- The northwest side of the Proposed Wind Farm site is mapped Annex I Active Raised Bog [7110]. A section of approximately 580m of a proposed floating road between T7-T9 will be located within the mapped Article 17 habitat.
- Approximately 285m of the proposed new floating access road between T7 and T9 corresponds to the Annex 1 habitat Degraded raised bogs still capable of natural regeneration (7120).
- Marsh Fritillary habitat is present in the area. A larval web recorded is approximately 17m north of the hardstand/new access road associated with T5. There is potential that the proposed new access roads, hard-stands and associated infrastructure at T5 may result in changes in the hydrological regime of the cutover bog (PB1) habitat, which may result in an alteration in habitat. This has potential to render the habitat no longer suitable for the food plant of Marsh Fritillary, thus impacting habitat availability.
- The location of T8 has high common pipistrelle activity and close proximity to a known roost.
- Hen Harrier - A roost was identified. There was a regularly used roost in a bog at Cloonboo More that was utilised by at least two individuals. The roost was outside the Proposed Wind Farm site and greater than 700m from the nearest proposed turbine location. Hen harrier was also observed roosting at Derrybaun (within 600m of the proposed turbine locations) and Cloonascragh (within the Proposed Wind Farm site, approximately 420m from the proposed turbine locations), but these were irregularly used, with roosting only confirmed on one occasion.
- Merlin - A roost was identified. A merlin was observed roosting at the hen harrier roost at Cloonboo More. This roost was outside the Proposed Wind Farm site boundary and greater than 700m from the nearest proposed turbine location.
- Peregrine falcon - Confirmed Breeding. There was a breeding territory identified, in Barnaderg, ~3.8km west of the nearest proposed turbine location.
- Whooper swan - A roost was identified. Whooper swan was regularly roosting at Horseleap Lough. This roost was outside the Proposed Wind Farm site boundary and approximately 760m from the Proposed Wind Farm site.
- Barn owl - Potential roost identified. There were signs of occupation of the derelict building sometime between the first survey in January and the second survey in May, but no signs of occupation before January, and no recent use by May. This indicates that barn owl may have used this building for roosting in winter, but also suggests that barn owl was not regularly roosting here.
- Kestrel - Confirmed Breeding. There were two breeding territories identified: one at Cloondahamer and one at Cloonascragh, both partially within in the Proposed Wind Farm site. In 2020 and again in 2021, a pair held a territory at Cloondahamer. In 2024, a pair held a territory in Cloonascragh.



- Lapwing - Confirmed Breeding. Lapwing were breeding at Horseleap Lough. This was outside the Proposed Wind Farm site boundary and approximately 760m from the Proposed Wind Farm site. A lapwing roost was identified. Lapwing was regularly roosting at Horseleap Lough. This roost was outside the Proposed Wind Farm site boundary and approximately 760m from the Proposed Wind Farm site.
- Swift - Confirmed Breeding. There was a breeding colony at Barnaderg, ~3.8km west of the nearest proposed turbine location.
- Shoveler - A roost was identified. Shoveler was regularly roosting at Horseleap Lough. This roost was outside the Proposed Wind Farm site boundary and approximately 760m from the Proposed Wind Farm site.
- Buzzard - Confirmed Breeding. There were four breeding territories identified: one at Cooloo, within in the Proposed Wind Farm site, and three in the wider surroundings at Cloonboo More, Dereen and Sunhill. In breeding season 2020, a pair held a territory at Cooloo. In 2021, a pair held a territory at Cloonboo More. Finally, in 2024, three pairs held territories at Cloonboo More, Dereen and Sunhill.
- Long eared Owl - Confirmed Breeding. There was a breeding territory within the Proposed Wind Farm site at Cloonascragh
- **Golden Plover** - A roost was identified. There was a roosting area in a bog at Derrybaun that was used on multiple occasions. The roost was outside the Proposed Wind Farm site boundary, though a small portion of the bog was within 500m of the proposed turbine locations. There was a second roosting area at Horseleap Lough. This roost was outside the Proposed Wind Farm site boundary and approximately 760m from the Proposed Wind Farm site.

Golden plover was recorded 108 times during vantage point surveys, with groups of over 2000 individuals recorded. EIAR states: *“Flocks up to 2,500 birds were recorded at the Proposed Wind Farm site and wider surroundings during surveys. Thus, the wintering golden plover population at the Proposed Wind Farm site is considered to be of **National Importance**.”*

The highest collision risk for Plover has been calculated at 197.810 collisions per year. Annual mortality of adult golden plover has been calculated at 27% per annum. If 197.810 collisions were to occur per year, it would mean that the losses at the Proposed Wind Farm would increase the annual mortality of the county population (c.5,895) by 12%. Therefore a bird mitigation plan has been proposed to mitigate this potential impact.

The Department has reviewed the Bird mitigation plan, which has been developed exclusively to mitigate impacts on Golden Plover. The field adjacent to T1 was utilised frequently by Plover. The bird mitigation plan outlines the proposed use of tethered bird control kites that will be erected in fields around T1 to provide visual deterrents. It is stated *“Following successful implementation of the mitigation plan, no significant effects of collision risk are anticipated”*. However, there is no analysis provided to show by how much the numbers will potentially be reduced (the



effectiveness of the mitigation), and thus how the conclusion of “*no significant effects of collision risk*” was drawn.

Regarding bat mitigation, the Department notes “*White light sources will have a “warm” colour temperature (less than 3000K)*” has been proposed and recommends using warm white lighting with a Correlated Colour Temperature (CCT) of below 2700 kelvins.

The Department takes this opportunity to remind the competent authority 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 the Galway County Development Plan.

### **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 IAC Ltd (EIAR Chapter 14; date 26 September 2025).

The proposed development is located in proximity to a number of Recorded Monuments that 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. It is noted 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. 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 (IAC Ltd; date 26 September 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 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 Department of Housing, Local Government and Heritage, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works.
  - 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 Department of Housing, Local Government and Heritage, 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. 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 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.
4. The planning authority and the Department of Housing, Local Government and Heritage 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](mailto:manager.dau@npws.gov.ie) where used, or to the following address:

The Manager  
Development Applications Unit (DAU)  
Government Offices  
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Is mise, le meas

Simon Dolan  
Development Applications Unit  
Administration