



Your Ref: **ACP-323780-25**

Our Ref: **SID-LK-2025-024**

(Please quote in all related correspondence)

31 October 2025

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

Via email to sids@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Proposed Strategic Infrastructure Development (SID): REDIII Application planning application for the construction of a Wind Energy Project within the townlands of Ballincurra, Ballingayrou, Ballinlee South, Ballinlee North, Ballinrea, Ballyreesode, Camas North, Camas South, Carrigeen, Knockuregare, Ballybane, Ballynanty, Cahirguillamore, Rockbarton, Grange, Ballynagallagh, Skool, Friarstown South, Friarstown, Rockstown, Rochestown, Carriganattin, Stonepark, Ballynagarde, Ballymacgreese, Glen, Knockbrien, Ballyneety, Scart, Ballyogartha, Carrigmartin, Cahernarry (Cripps), Drombanny, Ballybrennan, Coolyhenan, Knockananty, Ballysimon Commons, Tullovin, and Milltown, Co. Limerick.

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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 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 Laurence Dunne Archaeology (EIAR Chapter 14; date September 2025). We note 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—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. In addition, there are a number of recently identified non-Statutory Sites and Monuments Record (SMR) sites located in close proximity to the PDS. 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 that may be negatively impacted by the proposed development. In that regard, the large number of new archaeological sites discovered and archaeologically excavated within and immediately adjacent to the PDS in advance of Bord Gáis Éireann's Gas Pipeline to the West project must be an important consideration. The pipeline corridor (maximum 30m wide) transects the southern section of PDS (south of the L1414 roadway) and demonstrates the extremely high potential that this proposal will have direct negative effects to previously unknown sub-surface archaeological sites.

Exclusion zones may be necessary to protect vulnerable heritage assets located in proximity to the proposed development and to ensure that they are safely preserved in situ during the construction phase. In that regard, it is advised 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. It is advised that this can be addressed by the inclusion of an appropriate conditions if the development is permitted.

However, there are some substantive errors or omissions in the assessment of this project:

1. **Baseline archaeological and cultural heritage environment not adequately characterised:** Impact assessments must be informed by an adequate characterisation and understanding of the baseline archaeological and cultural heritage environment and its vulnerabilities. Given the density of known archaeological sites in very close proximity to certain turbines—e.g. T01; T06; T14; T15, T16—and other key elements of the proposal, there is insufficient information available from the desk-based research and walkover field inspection to adequately define likely scale and significance of the potential impacts to archaeological heritage. Targeted Archaeological Geophysical Survey and Archaeological Test Excavation is needed.
2. **Mitigation measures may not be adequate:** The EIAR suggests that potential significant impacts to certain known archaeological sites located in close proximity to certain turbines and other key elements of the proposal have been mitigated by design i.e. proposed infrastructure has been positioned to avoid direct negative impacts and these sites will be preserved in situ. However, many of these sites have no surface expression, so, in the absence of any Targeted Archaeological Geophysical Survey and Archaeological Test Excavation to more fully define and characterise these sites and their vulnerabilities, it is very unclear if these sites can actually be fully preserved in situ (and development impacts avoided by design) as proposed in the mitigation strategy.



Impact assessments must be informed by an adequate characterisation and understanding of the baseline archaeological and cultural heritage environment. In that regard, it is noted that the assessment has treated the identified archaeological sites within and immediately adjacent to the PDS as individual isolated receptors, without no substantive regard for their landscape context and potential inter-relationships.

The proposed development is situated within a dense distribution of known and identifiable archaeological sites. Elements of the proposed infrastructure are located in close proximity to clusters of known sites with potential direct impacts to those sites. The clustering of ring-barrow and ring-ditch sites—notably at T01 and around the Deposition Area to the north of Borrow Pit No 1—strongly suggest that the PDS encompasses a prehistoric (most likely Bronze Age) ritual landscape incorporating one or more barrow cemeteries. If such is the case, then it is likely that there are could be many more ring-barrows or ring-ditches present (surviving only as sub-surface remains) than have been identified to date from known survey records and examination of aerial photography. It is also possible that other types of archaeological features reflecting more extensive ritual and burial activity may be present in the vicinity of such cemetery clusters, such as cist or pit graves and flat cemeteries (often including urn burials). The proposed development could have quite extensive direct impacts to such a ritual landscape, but there is insufficient information available in the archaeological baseline to assess this. The discoveries made during construction of Bord Gáis Éireann's Gas Pipeline to the West project lend further weight to this view. The section of that scheme that passed through the southern section of PDS (south of the L1414 roadway)—a relatively narrow corridor (maximum 30m wide) from just south of T06 to just south of T15—uncovered eight new archaeological sites with examples of Bronze Age settlement, ritual and industrial sites.

The only way to confidently assess the extent of such a prehistoric landscape (and any potential direct impacts to it) is through direct prospection using archaeological geophysical survey and targeted archaeological test excavation. Deferment of the full archaeological assessment of the project to the post-consent stage (i.e. deferment of the carrying out of any archaeological geophysical survey or archaeological test excavation) as proposed in the EIAR is not appropriate, in this instance, and does not support the making of an informed planning decision. A fuller understanding of this prehistoric landscape may indicate that elements of the proposed development should be substantively redesigned or omitted to ensure the protection of archaeological heritage.

In that regard, the Department would like to draw particular attention to the positioning the following elements of the proposal:



- T01 is located within the midst of a cluster of five barrow sites: LI031-151001-; LI031-151002-; LI031-151003-; LI031-151004-; LI031-151005-. This suggests the turbine is in the middle of a barrow cemetery which could include further barrow sites and other burial or ritual features such as cist burials or urn burials. This potential and the direct negative impacts to such a cemetery have not been explicitly assessed.
- Deposition Area to the north of Borrow Pit 1 may partially incorporate the footprint of ring-barrow LI031-127---- so there is a potential of direct impacts to this site. In addition, the location of barrow LI031-152---- to the north and mound LI031-126---- suggest that this deposition area has also been located in the middle of a barrow cemetery. This potential and the direct negative impacts to such a cemetery have not been explicitly assessed.
- The proposed location for the substation may incorporate (in whole or in part) Earthwork site LI039-149----. The EIAR supposes that as this site is located within forestry and no longer has any above ground expression that it is non-extant (EIAR Section 14.3.1.3.8). However, without direct assessment there is still a potential that sub-surface remains survive and would be directly impacted by the development

National policy as detailed in Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland, 1999) is that there should always be a presumption in favour of avoiding developmental impacts on the archaeological heritage. In alignment with this, Section 14.6.3.2.1 state that there: *will be no direct physical effect to any of these recorded monuments during the construction phase*. This suggests that preservation in situ of these sites has been ensured by design. However, it is difficult to have full confidence in this when the assessment and design of the project rely only on desk-based research and walkover surveys:

1. very few of the known archaeological sites in proximity to these elements of the proposal have substantive above ground expression
2. assessment of the proposal has relied on historic survey file records, in many cases, to determine the location and potential extent of these sites with no confirmation of the accuracy and completeness of these records through geophysical survey or test excavation
3. it is not clear if aerial photography actually showing the monument has been accessed, in all cases, to at least confirm the exact location and extent of sites as originally identified
4. it is possible that some monuments could be larger in extent than the evidence from aerial photography would suggest or could have additional elements not captured by aerial photography (due to its limitations).

Best practice would be to carry out targeted Archaeological Geophysical Survey and Archaeological Test Excavation to confirm the full extent and character of these sites and



that sufficient provision has been made in the design of the project to ensure that preservation in situ of these known sites can actually be delivered and direct impacts avoided as proposed in the EIAR. The separation distance from proposed infrastructure (and protective exclusion zones) must be measured from outermost extent of a relevant site or monument (not approximations), which is why such exact definition must be established in the characterisation of the baseline environment.

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 of Housing, Local Government and Heritage, 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 (Laurence Dunne Archaeology; date 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 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 Department 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 or consent from National Monuments Service (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 the Planning Authority describing the results of the Archaeological Geophysical Survey.
 - b. The archaeologist shall liaise with the Department 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.



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.

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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Is mise, le meas

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