

Lauren Murphy

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Friday 9 January 2026 15:14
To: SIDS
Cc: LAPS
Subject: ACP-323860-25
Attachments: 20260109 SID-CW-2025-032.pdf

Categories: Lauren

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Good afternoon,

Attached are heritage observations/recommendations for the above-mentioned consultation. Please acknowledge receipt.

Regards,

Brian Bone
Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage

Aonad na nIarratas ar Fhorbairt
Development Applications Unit

Oifigí an Rialtais, Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Government Offices, Newtown Road, Wexford, Co Wexford, Y35 AP90



Your Ref: ACP-323860-25

Our Ref: SID-CW-2025-032

(Please quote in all related correspondence)

9 January 2026

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): 10 year planning permission for a 220kV AIS/ 220kV GIS substation OR a 110kV electricity substation, associated 220kV or 110kV underground grid connection and ancillary works located in the townlands of Ballyloo, Knockbower, Linkardstown, Kilballyhue, Graiguenspiddoge, Castletown, Moyle Big, Leigh or Ballybeg, Kellistown West and Kellistown East, County Carlow

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 heading(s).

Archaeology

It is noted that the planning application documentation includes an Archaeological Impact Assessment (AIA), which was carried out in relation to the proposed development by Rubicon Archaeology Ltd (dated 3 November 2025).

The AIA acknowledges that there is a potential that previously unknown sub-surface archaeological features or deposits may be present within the proposed development site. If present, these would be directly impacted by the proposed development.



It is noted that the assessment has been informed by an Advance Archaeological Geophysical Survey and Advance Archaeological Test Excavation as well as by a walkover survey. However, the Department notes that these advance investigations were focused on the planned solar farm development site (including the location for the proposed sub-station) and so do not fully encompass the full footprint of this proposal (including the grid connection route).

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 AIA.

Archaeological Requirements:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in the Archaeological Impact Assessment (Rubicon Archaeology Ltd dated 3 November 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 Test Excavation at greenfield sections of the development site not previously assessed and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the National Monuments Service of 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 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.

 - b. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service of the Department, 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. In advance of the commencement of any construction works, the developer shall engage a suitably qualified archaeologist to carry out Full Archaeological Excavation (licensed under the National Monuments Acts) of newly identified archaeological sites at the site for the sub-station and construction compound.**

 - a. The Full Archaeological Excavation shall be carried out in accordance with Best Archaeological Practice and in accordance with an approved Method Statement that shall incorporate a strategy for environmental sampling, finds retrieval and conservation and subsequent publication or other suitable dissemination of results.**
 - b. If significant archaeological features are discovered during the course of the Full Archaeological Excavation, work on site shall stop pending a decision of the planning authority, in consultation with the National Monuments Service of the Department, regarding appropriate additional mitigation measures, which may include preservation in-situ or full archaeological excavation. Any additional archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service of the Department, shall be complied with by the developer.**
 - c. No construction works shall be carried out on site until a Preliminary Excavation Report on the Full Archaeological Excavation has been submitted to the National Monuments Service of the Department and the Planning Authority and approval to proceed is agreed in writing.**
 - d. The developer shall ensure that any necessary Post-Excavation Analysis—as set out in the Preliminary Excavation Report—including (but not limited to) specialist analysis of finds and samples, scientific dating and conservation of artefacts is completed.**
 - e. The developer shall ensure that the results of the Full Archaeological Excavation are adequately disseminated to the public by way of publication or other appropriate means.**
- 4. For any watercourses where cable ducting cannot be inserted using trenchless methods then the developer shall commission an Underwater Archaeological Impact Assessment (UAIA), which shall include the following:**

 - a. A desktop assessment that addresses the underwater cultural heritage (including wrecks, archaeological objects, built heritage, riverine heritage and industrial heritage) of all waterway crossings where works are proposed. The assessment shall**



- include a full inventory, mapping and survey (photographic, descriptive, photogrammetric, as appropriate) of underwater cultural heritage features and structures and archaeological objects identified by desk study research, fieldwork, cartographic analysis, historical research and prior archaeological investigations.
- b. The UAIA shall include a dive/wade assessment (consent/licensed as required under the National Monuments Acts), accompanied by a hand-held metal detection survey, centred on (but not confined to) any area(s) where in-stream works are proposed.
 - c. Having completed the above-described works, the archaeologist shall submit a final written report to the National Monuments Service of the Department describing the results of the UAIA. The report shall include a comprehensive Archaeological Impact Statement (AIS). No construction works shall commence until after the UAIA has been submitted and reviewed. All recommendations will require the agreement of the National Monuments Service of the Department prior to construction commencing.
5. 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 Archaeological Impact Assessment (Rubicon Archaeology Ltd dated 3 November 2025) 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.
 6. The planning authority and the National Monuments Service of 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,

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)
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Newtown Road
Wexford
Y35 AP90

Is mise, le meas,

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration