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**FW: RED III SID application ACP-324113-26**

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**From** LAPS <laps@pleanala.ie>  
**Date** Mon 4/27/2026 9:48 AM  
**To** SIDS <sids@pleanala.ie>

 1 attachment (416 KB)  
ACP SID-GW-2026-006.pdf;

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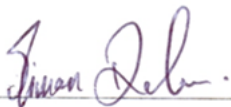
**From:** Simon Dolan (Housing) <Simon.Dolan@npws.gov.ie>  
**Sent:** Friday 24 April 2026 15:32  
**To:** LAPS <laps@pleanala.ie>  
**Subject:** RED III SID application ACP-324113-26

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A Chara,

Attached please find the Archaeological & Nature Conservation recommendations.

Regards,



**Simon Dolan**

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



**Your Ref: ACP-324113-26**

**Our Ref: SID-GW-2026-006**

*(Please quote in all related correspondence)*

24 April 2026

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

Via email to [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

**Proposed Strategic Infrastructure Development (SID):** RED III SID application for natural gas-fuelled electricity generation plant, known as the Cashla Peaker Plant at Rathmorrissy and Pollnagroagh townlands, Athenry, Co. Galway.

A chara

I refer to correspondence in connection with the above.

Outlined below are heritage-related observations/recommendations coordinated by the Development Applications Unit under the stated headings

### **Archaeology**

It is noted that the Environmental Impact Assessment Report (EIAR) submitted as part of the planning application incorporates a desk-based Archaeological Impact Assessment (AIA) which was carried out in relation to the proposed development by Rubicon Archaeology Ltd (EIAR Chapter 13; date February 2026). The Department notes that the EIAR was informed by a programme of Advance Archaeological Geophysical Survey and Advance Archaeological Test Excavation as well as a walkover survey. The Department has reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.

Therefore, 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 C4 and C5 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 13 of the EIAR (February 2026) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. A Project Archaeologist shall be appointed to oversee and advise on all aspects of the scheme from design, through inception to completion.
  - a. The Project Archaeologist shall liaise with the Department of Housing, Local Government & Heritage and the Planning Authority to agree in advance an overall strategy for archaeological works to be carried out both in advance of and in parallel with construction of the development.
  - b. This shall include the scope of any Archaeological Monitoring as well as any additional mitigation measures that may be required to protect archaeological heritage.
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 13 of the EIAR (date February 2026) 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 & 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.

### **Nature Conservation**

The Natura Impact Statement (NIS) and associated documentation submitted in support of the proposed Cashla Peaker Plant and associated infrastructure at Pollnagroagh / Rathmorrissy, Athenry, Co. Galway has been reviewed. This review has had regard to all supporting ecological and technical documentation. This assessment is undertaken in accordance with Article 6(3) of the Habitats Directive (92/43/EEC). In this regard, consent for the proposed development may only be granted where it can be established, beyond reasonable scientific doubt, that the proposed development will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects.

### **European Sites and Impact Pathways**

The NIS identifies a number of European sites within the Zone of Influence, including the Galway Bay Complex SAC, Inner Galway Bay SPA, and Cregganna Marsh SPA. These sites support a range of qualifying interests and special conservation interests, including habitats and species that are sensitive to changes in water quality, disturbance, and atmospheric deposition.



The Department considers that the principal impact pathways associated with the proposed development include hydrological connectivity, air emissions and atmospheric deposition, disturbance arising from construction and operational activities, including artificial lighting, and in-combination effects with other plans and projects. While these pathways are acknowledged within the NIS, the level of analysis provided is not sufficient in all cases to allow for a definitive conclusion to be reached.

### **Hydrological Connectivity**

The NIS does not provide sufficient site-specific evidence to robustly demonstrate the absence of hydrological connectivity between the proposed development and European sites. The assessment relies to a significant extent on generalised assumptions regarding distance and catchment characteristics, without presenting detailed mapping of drainage pathways or a clear demonstration of how pollutants or sediment could be prevented from reaching downstream receptors.

In particular, the potential for indirect pathways, including surface water runoff during construction and accidental pollution events, has not been fully characterised. In the absence of a clearly demonstrated absence of pathway, it is not possible to exclude the risk of effects on European sites.

### **Ornithological Baseline and Disturbance**

The Breeding and Wintering Bird Survey comprises a limited number of survey visits, namely four wintering surveys and three breeding season surveys undertaken over relatively short time periods. These surveys are largely confined to the development footprint and its immediate surroundings.

It is noted that the scope of the surveys is limited and does not provide a comprehensive assessment of bird usage of the wider area, including lands that may be functionally linked to nearby Special Protection Areas. While the survey concludes that the site is of limited importance for wintering birds, it is acknowledged that species of conservation concern, including Golden Plover, utilise the wider area.

The assessment of disturbance is not sufficiently developed. In particular, there is no integrated consideration of disturbance arising from lighting, noise, human activity, and operational processes. The potential for displacement of bird species from functionally linked habitats has not been adequately assessed.

Furthermore, the Zone of Influence applied within the ornithological assessment is restricted and does not reflect the spatial extent over which disturbance effects may arise. This limitation undermines the robustness of the conclusions presented.

### **Bats**

The survey comprises a preliminary walkover survey and a period of static detector monitoring over thirteen consecutive nights in June. While this provides information on summer activity, it does not constitute a comprehensive multi-season assessment. The absence of survey effort during spring and autumn periods introduces uncertainty regarding commuting, dispersal, and swarming behaviour.

The baseline identifies a number of bat species actively foraging within the site and along its boundaries, including species known to be sensitive to artificial lighting. The report also



identifies treeline habitat along the site boundary as supporting higher levels of activity and indicates potential roosting within tree features. However, no detailed roost assessment has been undertaken to confirm or exclude this potential.

The assessment is primarily confined to the development footprint and does not adequately consider the role of boundary habitats and linear features as commuting routes within the wider landscape. The potential ecological connectivity of the site has therefore not been fully evaluated.

Having regard to the Site Lighting Report, the Department notes that the proposed development includes extensive permanent lighting infrastructure, including luminaires mounted at heights of approximately 8 metres and 20 metres, with lighting levels designed to achieve average horizontal illuminance in the order of 10 lux, with higher localised values

Artificial lighting is not assessed within the bat report, notwithstanding the scale of proposed lighting infrastructure. The absence of a bat-specific lighting impact assessment represents a significant deficiency, particularly given the known sensitivity of certain bat species to illumination. In the absence of such assessment, the potential for disruption of commuting routes and displacement from foraging habitat cannot be excluded.

Mitigation measures are limited in scope and lack specificity. There is no clear strategy for habitat retention, avoidance of key features, or mitigation of lighting impacts. On this basis, the assessment does not provide sufficient information to support a conclusion of no adverse effect on bat species.

### **Mitigation Measures**

The NIS proposes a range of mitigation measures; however, many of these are described in general terms and lack sufficient detail regarding their implementation and effectiveness. There is a reliance on standard best practice measures without clear demonstration of their adequacy in the specific context of this site.

Mitigation measures must be precise, certain, and capable of implementation in order to be relied upon in an Appropriate Assessment. In the absence of such detail, the effectiveness of the proposed mitigation cannot be confirmed.

### **Recommendation**

On the basis of the information provided, it cannot be concluded, beyond reasonable scientific doubt, that the proposed development will not adversely affect the integrity of European sites, either alone or in combination with other plans and projects.

Significant uncertainty remains in relation to hydrological connectivity, artificial lighting and disturbance, the ornithological baseline, the assessment of bat impacts, and the evaluation of in-combination effects.

Further information is required to address the deficiencies identified. Pending the submission and assessment of such information, it is not possible to conclude that the proposed development will not adversely affect the integrity of European sites.

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) or to the following address:



The Manager  
Development Applications Unit (DAU)  
Government Offices  
Newtown Road  
Wexford  
Y35 AP90

Is mise le meas,

A handwritten signature in dark ink, which appears to read "Julie Sullivan". The signature is written in a cursive style and is positioned above a horizontal line.

Julie Sullivan  
Assistant Principal  
Development Applications Unit  
Administration