
ACP-324132-26

From Housing Manager DAU <Manager.DAU@npws.gov.ie>

Date Wed 4/22/2026 2:59 PM

To SIDS <sids@pleanala.ie>

Cc LAPS <laps@pleanala.ie>

 1 attachment (233 KB)

ACP-324132-26 Tipperary SID-TN-2026-007.pdf;

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A Chara,

Attached please find the Heritage observations/recommendations of the Department in relation to the aforementioned Strategic Infrastructure Development.

Can you please confirm receipt of same?

Regards
Diarmuid

Diarmuid Buttimer
Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreacht
Department of Housing, Local Government and Heritage
Aonad na nIarratas ar Fhorbairt
Development Applications Unit

Oifigí an Rialtais
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Your Ref: **ACP-324132-26**
Our Ref: **SID-TN-2026-007**

22 April 2026

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

Via email to sids@pleanala.ie ; laps@pleanala.ie

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

Proposed Strategic Infrastructure Development (SID): Marmoris Limited trading as Killough Solar: Development of a 110kV electrical Gas Insulated Switchgear (GIS) substation: Graigue, Co. Tipperary.

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 planning application documentation includes an Archaeological Impact Assessment (AIA) which was carried out in relation to the proposed development by IAC Ltd (date 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 (PDS). 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, it is noted that these advance investigations were focused on the planned solar farm development site (including a section of the grid connection route) and so do not fully encompass the full footprint of this proposal (in particular the proposed sub-station site). The Department advises that advance archaeological geophysical survey and advance archaeological test excavation of all greenfield areas of the PDS 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. It is advised that this can be addressed by the inclusion of an appropriate condition, if the development is permitted.

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 AIA.

Archaeological Requirements:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in the Archaeological Impact Assessment (IAC Ltd; date 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 a pre-development Archaeological Geophysical Survey and a pre-development Archaeological Test Excavation at the location for the sub-station 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 from the Department 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.
 - 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 Department, 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 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 (IAC Ltd; date 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.
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:

The Manager
Development Applications Unit (DAU)
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Newtown Road
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Is mise, le meas

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration