



Your Ref: ACP-324155-26

Our Ref: SID-CL-2026-014

(Please quote in all related correspondence)

8 July 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 Cahermurphy Wind Farm consisting of 8 no. wind turbines, 110kV electrical substation and ancillary development

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).

Nature Conservation

Hydrological Pathways

Given the scale of earthworks, peat excavation, borrow pits and approximately 25 kilometres of underground grid connection, additional justification should be provided demonstrating that all hydrological pathways to downstream European sites have been fully identified and assessed.

The assessment should clearly distinguish between temporary construction effects and longer-term hydrological alteration.



Freshwater Qualifying Interests

The assessment of downstream Special Area of Conservation qualifying interests, including freshwater pearl mussel, salmon and lamprey species, should provide clearer evidence demonstrating that sediment, nutrient and pollution risks have been quantified and that mitigation measures are sufficient under worst-case rainfall and construction scenarios.

Reliance on standard construction mitigation alone may not always be sufficient where sensitive aquatic qualifying interests are present.

Hen Harrier

The proposal includes substantial habitat enhancement and forestry removal for hen harrier.

While these measures may provide ecological benefits, it should be made clear that enhancement measures are not relied upon to avoid or reduce adverse effects unless they satisfy the legal tests for mitigation under Article 6(3).

The assessment should clearly distinguish between mitigation necessary to protect site integrity and biodiversity enhancement measures that provide additional ecological gain.

Ornithology

The assessment should demonstrate more explicitly that collision risk, displacement and barrier effects have been considered for all Special Protection Area qualifying interests that may utilise the wider landscape, including occasional or seasonal use outside mapped core areas.

Construction Environmental Management

A number of important mitigation measures are deferred to the Construction Environmental Management Plan, Peat Management Plan and other subsequent documents.

Where mitigation is necessary to conclude no adverse effect on site integrity, the Natura Impact Statement should ensure that these measures are sufficiently precise, certain and enforceable within the planning permission and are not left to later agreement.

Monitoring

Monitoring measures should be clearly distinguished from mitigation.



Monitoring cannot compensate for uncertainty at the Appropriate Assessment stage and should not be relied upon as the basis for concluding no adverse effects.

Recommendation

In several sections, the assessment concludes that effects are unlikely. Where scientific uncertainty remains, the report should explain more explicitly why sufficient scientific certainty nevertheless exists to exclude adverse effects on European site integrity.

The Department considers that additional information and clarification are required before it can be concluded beyond reasonable scientific doubt that the proposed development, either alone or in combination with other plans and projects, will not adversely affect the integrity of European sites. The competent authority must be satisfied that there is no reasonable scientific doubt regarding the absence of adverse effects on the integrity of European sites. A number of aspects of the assessment require further clarification or stronger evidential support before this conclusion can be reached.

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)
Government Offices
Newtown Road
Wexford
Y35 AP90

Yours faithfully,

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration