

FW: Your Ref: ACP- 324161-26 Our Ref: SID-OY-2026-009

From LAPS <laps@pleanala.ie>
Date Tue 5/26/2026 3:17 PM
To SIDS <sids@pleanala.ie>

 1 attachment (259 KB)
SID-OY-2026-009.pdf;

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Tuesday, May 26, 2026 3:12 PM
To: LAPS <laps@pleanala.ie>
Subject: Your Ref: ACP- 324161-26 Our Ref: SID-OY-2026-009

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A Chara,

Attached please find the archaeological and nature conservation observations/recommendations of the Department in relation to the aforementioned SID application for a Renewable Energy Development comprising 15 no. wind turbines, a permanent 220kV on-site substation, and associated infrastructure and works within the townlands of Cooldorragh, Kilnagarnagh, Cappanalosset, Tumbeagh, Killaghintober, Castlearmstrong, Leabeg, Cornafurrish and Corrabeg, Lemanaghan, Kilnagoolny, Straduff, Lisdermot, Derrica More, Rosfaraghan, Rashinagh, Cor Mor and Cor Beg, Corbane, and Ballindown, County Offaly.

Can you please confirm receipt of same?

Kind Regards,
Sinéad

Sinéad O' Brien
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- 324161-26

Our Ref: **SID-OY-2026-009** *(Please quote in all related correspondence)*

26 May 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): Renewable Energy Development comprising 15 no. wind turbines, a permanent 220kV on-site substation, and associated infrastructure and works within the townlands of Cooldorragh, Kilnagarnagh, Cappanalosset, Tumbleagh, Killaghintoher, Castlearmstrong, Leabeg, Cornafurrish and Corrabeg, Lemanaghan, Kilnagoolny, Straduff, Lisdermot, Derrica More, Rosfaraghan, Rashinagh, Cor Mor and Cor Beg, Corbane, and Ballindown, County Offaly.

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 headings.

Archaeology

It is noted that the Environment Impact Assessment Report (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 Tobar Archaeological Services Ltd (EIAR Chapter 13; date March 2026).

The proposed development is located in proximity to a very large number of Recorded Monuments which are subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1930-2014. The EIAR also 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 a Walkover Survey only, as well as archaeological monitoring of very localised advance Site Investigations works. There has



been no comprehensive programme of advance prospecting, such as Archaeological Geophysical Survey or advance Archaeological Test Excavation or systematic recent Peatland Survey, which would provide greater clarity as to the potential presence of sub-surface archaeological features or deposits. The Department does note that there are older Peatland Surveys from the period 1998–2013 which were consulted, but as industrial peat extraction activities continued until 2020, a more up-to-date Peatland Survey is needed.

The Department advises that advance systematic Peatland 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. The Department advises that this can be addressed by the inclusion of an appropriate Condition if the development is permitted.

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 EIAR.

Archaeological Requirements

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 13 of the EIAR (Tobar Archaeological Services Ltd; date March 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 National Monuments Service (NMS) 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 Advance Test Excavation and Archaeological Peatland Surveys, as well as any additional mitigation measures that may be required to protect archaeological heritage.
3. The Developer shall engage a suitably qualified Archaeologist (licensed under the National Monuments Acts) to carry out a comprehensive pre-development Peatland Survey of all peatlands within the development site.



- a. The Archaeologist shall liaise with the National Monuments Service (NMS) to agree a scope and methodology for the Peatland Survey.
 - b. The report on the Peatland Survey shall include location, written description and classification (as per current NMS classifications of Peatland sites) for each archaeological siting and also include digital photography, sketch plans and sections as well as relevant peat stratigraphic information and the recording of wood technologies. Threat assessments and recommendations shall also be made for each site.
4. The Developer shall engage a suitably qualified Archaeologist (licensed under the National Monuments Acts) to carry out a pre-development Archaeological Test Excavation for all areas of proposed ground disturbance and to submit an Archaeological Impact Assessment Report for the written agreement of the Planning Authority, following consultation with the National Monuments Service, in advance of any site preparation works or groundworks, including Site Investigation works/topsoil stripping/site clearance and/or construction works.
 - a. The Archaeologist shall liaise with the National Monuments Service (NMS) to establish—based on the results the Peatland Surveys—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.
 - b. 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.
 - c. Any further archaeological mitigation requirements specified by the Planning Authority, following consultation with the National Monuments Service, shall be complied with by the Developer.
 - d. 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.
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 Chapter 14 of the EIAR 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 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.

Nature Conservation

These observations are intended to assist An Coimisiún Pleanála in meeting obligations that may arise in relation to European sites (Natura 2000 sites) in the context of the proposed development. In relation to European sites (Special Areas of Conservation (SACs); Special Protection Areas (SPAs)), the Department places particular emphasis in its observations on the level of detail contained in the screening for Appropriate Assessment (AA) and Natura Impact Statement (NIS). An AA Determination must contain complete, precise and definitive findings and conclusions with regard to the implications of a proposal for the Conservation Objectives and integrity of a European site.

Matters relating to Appropriate Assessment

The Department notes that a NIS has been prepared as part of the planning application for the proposed wind farm, by MKO. The Department advises that a Condition be attached to planning (should permission be granted) that all mitigation measures outlined in the Natura Impact Statement (NIS) and all other relevant documents must be implemented in full. The Department also has the following comments/observations:

Groundwater

Ferbane Bog SAC (Site Code: 000575) is located approximately 1.3km southwest of the proposed development, and Moyclare Bog SAC (Site Code: 000581) is located approximately 4.8km from the proposed development. Both of these SACs are designated for a number of groundwater-dependent terrestrial ecosystems. Table 4-1 of the NIS for both SACs notes that

“There is no hydrological connection between the Proposed Project and this SAC via surface or groundwater”

and significant effects are ruled out. However; the proposed development, Ferbane Bog SAC and Clara Bog SAC (Site Code: 000572) are all located within the Clara Ground Waterbody (GWB). Consideration must be given to the hydrogeological connectivity between the



proposed development site and Natura sites. Any adverse impacts on groundwater could negatively affect the Site-Specific Conservation Objectives (SSCOs) for Natura 2000 sites. The maintenance of a high water table is essential to sustain raised bog habitats and species. The Department recommends that further clarification on the potential for hydrogeological effects from the proposed development on nearby SACs is provided and expanded upon.

Overhead lines

Section 2.2 of the NIS includes the following text on the Characteristics of the Proposed Project;

“The permanent installation of c. 800m of 220kV overhead line, 4 no. new steel masts, temporary tower build areas, temporary tower crane pads and associated hard-standing areas to facilitate the new ‘loop-in/loop-out’ connection into the existing 220kV Shannonbridge to Maynooth line”.

Whilst there is a detailed analysis in the NIS on the potential for significant effects from collision risk from the proposed turbines on a number of Species of Conservation Interest (SCI) bird species from nearby SPAs, there has been no analysis on the potential for significant effects from collision risk from the overhead line that is proposed. The Department recommends that Further Information is requested on the potential for collision risk from the proposed overhead lines, and that mitigation measures are included, if deemed necessary, such as bird diverters.

Matters relating to Environmental Impact Assessment

Determining Ecologically Significant Effects

It is noted that the Bird Chapter of the EIAR, the terminology used to determine significant effects is based on the Environmental Protection Agency (EPA) Environmental Impact Assessment guidance (2022). The Percival guidance (2003) is also used in the Ornithology Chapter

“given its specific focus on birds”.

The Department advises that whilst both above references can be used in ecological reports, it is more appropriate to use the Chartered Institute of Ecology and Environmental Management (CIEEM) (2024) approach and terminology for defining significance at the relevant geographic scale of reference. This is specified in the EPA Environmental Impact Assessment (EIA) guidance under Table 3.4 on Page 53:

“There are seven generalised degrees of impact significance that are commonly used in EIA. Imperceptible, Not Significant, Slight, Moderate, Significant, Very Significant and Profound. Generalised definitions of each of these are provided in Table 3.3 above. Where more specific definitions exist within a specialised factor or topic e.g. biodiversity, these should be used in preference to these generalised definitions.”



And on page 50 of the guidance it states:

“Describing the Significance of Effects ‘Significance’ is a concept that can have different meanings for different topics – in the absence of specific definitions for different topics the following definitions may be useful (also see Determining Significance below).”

The CIEEM guidance (2024) is ecology-specific, whereas the EPA guidance covers overall environmental assessment (hydrology, geology, air, human health etc.), and does not provide the detailed ecological framework for; valuing ecological receptors, assessing the magnitude of effects, determining ecological significance, and applying professional ecological judgement. It is recognised that the CIEEM guidance is used within the Biodiversity and Ornithology Chapters for valuing the importance of key ecological receptors, but it has not been used for determining significance at the relevant geographical scale.

The Percival guidance (2003) whilst still useful as it uses geographical scale, is over 20 years old and has been superseded by more comprehensive and widely accepted methodologies, as well as updates to legislation, Red Lists, and conservation status of species of conservation concern. The CIEEM guidance is well recognised as it incorporates a wider range of factors that will influence how significance level is determined.

Birds

Lighting

The potential impacts of lighting on turbines have not been considered by the Applicant in the Birds Chapter of the EIAR. Migrating birds such as Whooper Swan, are more at risk than other species as they can migrate at nighttime. The Department recommends that Further Information is requested on this. Aviation lighting design should consider best practice guidance, such as the NatureScot Information Note on the Effects of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures¹. A number of mitigation options exists, and these are listed in this guidance and should be considered in relation to the proposed development.

Collision risk

It is noted that a programme of monitoring is proposed as a best practice measure as significant effects were not identified in relation to the collision risk impact on birds. Methods to establish searcher efficiency and details of reports which have established known removal rates must be specified. Search frequency and search radii must also be specified. Details should be provided of mitigation measures to be undertaken should Whooper Swan or other bird mortality turn out to be of higher significance than predicted through modelling. The Department recommends that Further Information is provided on this.

¹ <https://www.nature.scot/sites/default/files/2020-10/Wind%20farm%20impacts%20on%20birds%20-%20Turbine%20lighting%20and%20birds%20-%20Information%20Note.pdf>



Mitigation measures

It is advised that a schedule collating all mitigation measures is produced as part of the Construction Environmental Management Plan and agreed with the Local Authority prior to commencement of any works.

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

Is mise, le meas

A handwritten signature in blue ink, which appears to read "Julie Sullivan".

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration