

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



Your Ref: ACP-324167-26
Our Ref: **SID-RN-2026-010**
(Please quote in all related correspondence)

25 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): Wind Farm consisting of 11 wind turbines with a blade tip height of 185 metres, an onsite 110kv substation, a 110kv underground cabling connection to the existing Flagford 220kv substation and all associated infrastructure and works in the townland of Carrigeen and adjacent townlands in County Roscommon.

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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 IAC Ltd (EIAR Chapter 15; date March 2026).

The EIAR acknowledges that there is a potential that previously unknown sub-surface archaeological features or deposits may be present within the proposed development site (PDS) which may be negatively impacted by the proposed development. The Department notes that no advance archaeological investigations have been carried out within the PDS to inform the EIAR, other than a Walkover Survey. The Department advises that advance archaeological Test Excavation 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 wider landscape of the Scheme includes the Rathcroghan complex of monuments, located c. 3.2km southeast of the PDS (at its nearest point). The Rathcroghan complex of monuments is one of six focal sites within the group listing for the Royal Sites of Ireland which has been included in the current Tentative List for inscription as a World Heritage Site. It is not yet formally designated as a World Heritage Site. Elements of the complex, however, are National Monuments in the ownership or guardianship of the Minister. These sites are subject to statutory protection under Section 14 of the National Monuments Act 1930-2014.

The Department notes that the EIAR includes and has been informed by a Heritage Impact Assessment (HIA) for the Rathcroghan complex of monuments (EIAR Appendix 15.1; February 2026). The HIA is aligned to the UNESCO *Guidance and Toolkit for Impact Assessments in a World Heritage Context* and (in the context of a wind energy project) the UNESCO *Guidance on Wind and Solar Energy Projects in a World Heritage Context*. An integrated assessment of the potential effects of the proposed Scheme to the setting of vulnerable heritage receptors including the Rathcroghan complex of monuments is set out across the HIA and Chapters 12 and 15 of the EIAR (dealing with Landscape and Visual Amenity and Cultural Heritage respectively). The HIA concludes that the operation of the proposed Scheme would result in a minor negative impact on potential Outstanding Universal Value (OUV) for the Rathcroghan complex (caused through a negligible degree of negative change to two outline attributes of Rathcroghan) but would not be sufficient to materially impact the overall authenticity and integrity of the tentative Royal Sites of Ireland as a proposed group for inscription.

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 15 of the EIAR (IAC 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. The Developer shall engage a suitably qualified Archaeologist (licensed under the National Monuments Acts) to carry out Pre-development Archaeological Testing in 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 Report 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, 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. 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 15 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.
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.

Nature Conservation

This submission is made in the context of this Department's role in relation to nature conservation. These observations are intended to assist An Coimisiún Pleanála in relation to identifying potential impacts on European and national nature conservation sites, biodiversity and environmental protection in general, in the context of the current proposal.

The following observations are provided;



The Department notes that the Environmental Impact Assessment (EIA) and Natura Impact Screening (NIS) have identified the primary underlying peatland habitats within the proposed development boundary as cutover (PB4) and degraded (PB5) raised bog subject to both long-term and current deteriorations. The close proximity of the Cloonshanville Bog Special Area of Conservation (SAC) (Site Code: 000614) to the proposed development is also highlighted. The assessments have identified that the SAC is hydrologically separated from the proposed development by the intervening L1217 local road with adjacent deep roadside drains of c. 2 m depth. However, the total underlying peat depth at this location does not appear to have been measured. Whilst the roadside drains may function as a hydraulic and surface water barrier, the potential for some level of hydrogeological interactions between the Cloonshanville Bog SAC and the development site therefore cannot be definitively ruled out in the absence of further clarification. Acknowledging the proposed enhancement measures outlined for areas of degraded peatlands on site, the Department nevertheless recommends that An Coimisiún Pleanála should satisfy itself that the removal of c. 2 ha of raised bog associated with excavations will not generate any potential long-term negative impacts on the hydrological integrity of the site in respect of the conservation objectives for the Cloonshanville Bog SAC.

The Department also draws attention to the proposed future management protocol for the site which aims to prevent the occurrence of further damaging land management activities associated with turbary and agricultural practises, namely peat cutting and drainage, flailing/mowing and burning. As outlined in the Biodiversity Enhancement and Management Plan (BEMP), it is stated that

'the Applicant will prevent ongoing damaging land management practices during the lifetime of the Project within the BMEP areas'.

However, the mechanisms by which these will be enforced is not clarified. In addition, the status of further activities outside of these BEMP areas has also not been clarified, which may have the potential to impact the efficacy of such measures within the enhancement areas. Certainty is therefore sought as to the mechanisms by which the long-term management of the site will be ensured during the lifetime of any planning consent and the implications of adjacent management practices outside of BEMP areas.

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
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Government Offices
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Administration