

ACP-324270-26 (PAX)

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

Date Thu 6/25/2026 4:44 PM

To SIDS <sids@pleanala.ie>

Cc LAPS <laps@pleanala.ie>

 1 attachment (265 KB)

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Our Ref: SID-CL-2026-020

Good afternoon,

Attached are heritage-related observations/recommendations for the above-mentioned consultation. Please acknowledge receipt.

Regards,

Brian Bone

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, Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90

Government Offices, Newtown Road, Wexford, Co Wexford, Y35 AP90



Your Ref: ACP-324270-26 (PAX)

Our Ref: SID-CL-2026-020

(Please quote in all related correspondence)

25 June 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): Proposed development of 9 no. wind turbines, a permanent extension to the existing 110kV Slievecallan substation at Knockalassa and associated infrastructure and works

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).

Archaeology

It is noted that the Environmental 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 14; dated 22 April 2026).

The proposed development is located in proximity to a number of Recorded Monuments — located both within and without the red line boundary for the development — 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), 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 Department notes that exclusion zones will be necessary to protect vulnerable heritage assets located in proximity to the PDS and ensure that they are safely preserved in situ during the construction phase. In this regard, the Department advises that similar measures may be required at the decommissioning phase also and that the advice of a suitably qualified archaeologist may be needed to inform any plan for decommissioning of the development in due course. 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 that 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 14 of the EIAR (Tobar Archaeological Services Ltd; dated 22 April 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 of 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 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 of the Department, 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.** A suitably qualified archaeologist shall be retained to advise on and establish appropriate Exclusion Zones around the external-most elements of vulnerable Heritage Assets located within the development site (as identified in Chapter 14 of the EIAR or by any subsequent investigations associated with the project).
 - a.** Exclusion Zones shall be fenced off or appropriately demarcated for the duration of construction works in the vicinity of the monuments. The location and extent of each Exclusion Zone and the appropriate methodology for fencing off or demarcating at each location shall be agreed in advance with the National Monuments Service of the Department and the planning authority.
 - b.** No groundworks of any kind (including but not limited to advance geotechnical site investigations) and no machinery, storage of materials or any other activity related to construction will be permitted within Exclusion Zones.
- 4.** The Construction Environmental 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.
- 5.** The applicant shall retain the services of a suitably qualified archaeologist to advise on an archaeological mitigation plan for the decommissioning of the development, to include mitigation measures for the removal of the turbines and the protection of any archaeological sites and monuments that are in situ at the site. The Decommissioning Plan shall be updated to include the location of any archaeological or cultural heritage



constraints as set out in Chapter 14 of the EIAR and by any subsequent archaeological investigations associated with the project. It shall clearly describe all identified likely impacts from decommissioning — both direct and indirect — and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during decommissioning works.

6. The planning authority and the National Monuments Service of 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

The following observations are made by the Department in its role as a prescribed body under planning legislation and as the authority with overarching responsibility for nature conservation and the nature directives (i.e. the Birds and Habitats Directives) and wider biodiversity.

These observations are intended to assist the planning authority 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, SAC; Special Protection Areas, SPA), 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 an NIS has been prepared as part of the planning application for the proposed wind farm by MKO Planning and Environmental Consultants. The Department advises that a condition be attached to planning (should permission be granted) that all mitigation measures outlined in the NIS and all other relevant documents must be implemented in full.



Hen Harrier

A central requirement of Appropriate Assessment is that the competent authority must be satisfied, beyond reasonable scientific doubt, that the proposed development will not adversely affect the integrity of any European site. In this context, the documentation provides a range of information on potential impacts, including disturbance, displacement and collision risk, together with proposed mitigation and monitoring measures. These elements reflect established approaches in ornithological assessment.

However, the underlying survey data for Hen Harrier continue to rely primarily on vantage point surveys and limited breeding surveys. While these are appropriate components of an assessment, there is limited evidence that they have been supplemented by more detailed, habitat- or territory-based surveys that would provide a fuller understanding of nesting locations, foraging areas and territory structure. As a result, there remains some uncertainty as to how fully the ecological use of the site by Hen Harrier has been characterised, and how predicted impacts relate to the functioning of the local population.

Similarly, while the documentation references the conservation context for Hen Harrier, there is not a clearly structured analysis demonstrating how predicted impacts would affect the regional breeding population, or how this in turn relates to the wider population. The absence of a more explicit population-level framework makes it difficult to fully understand the implications of displacement or disturbance, particularly in the context of known population trends.

The approach to habitat loss and displacement is supported by the inclusion of a Biodiversity Management and Enhancement Plan, which sets out measures to improve habitat condition. This represents a constructive addition to the application, and the inclusion of structured habitat management proposals is welcomed. However, the relationship between the identified impacts and the proposed measures is not always clearly defined, and it is not fully demonstrated how the enhancement measures will offset the functional loss of habitat or changes in habitat use that may occur.

In addition, some ecological factors that can influence Hen Harrier breeding success, such as predation risk and edge effects associated with habitat configuration, are not explicitly considered in the assessment. While not always straightforward to quantify, these factors are recognised components of the species' ecology and could usefully be addressed in order to provide a more complete understanding of potential effects.



Finally, the proposed monitoring programme is detailed and reflects current best practice, with long-term surveys designed to track bird activity, breeding success and the effectiveness of habitat measures. This is a positive element of the application. However, monitoring is primarily intended to assess outcomes during operation, and therefore does not fully resolve uncertainties at the assessment stage. From an Appropriate Assessment perspective, a higher level of certainty is generally required in advance of consent.

Overall, while the documentation includes many of the expected components of an Appropriate Assessment, there remain areas where the link between baseline data, impact prediction and mitigation outcomes could be more clearly demonstrated.

Matters relating to Environmental Impact Assessment

Determining Ecologically Significant Effects

It is noted that in both the Biodiversity Chapter and the Ornithology Chapter of the EIAR, the terminology used to determine significant effects is based on the EPA Environmental Impact Assessment guidance (2022). Section 9.8 of the Biodiversity Chapter states that “ecological significance of the effects of the Proposed Development are determined following the precautionary principle and in accordance with the methodology set out in Section 5 of CIEEM (2018)”. However, on review of the ecological significance of effects of the Proposed Development, only the EPA guidance is used in the Biodiversity Chapter, whilst the Percival guidance (2003) is also used in the Ornithology Chapter “as it is adapted specifically for use on effects on birds”.

The Department advises that whilst both of the above references can be used in ecological reports, it is more appropriate to use the CIEEM (2024) approach and terminology for defining significance at the relevant geographic scale of reference. This is specified in the EPA 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.”

“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.

Survey Methodology

In relation to Environmental Impact Assessment, the Department recognises that the documentation provides a detailed and structured description of habitats, supported by a robust botanical survey baseline. The identification and classification of habitats, including Annex I types, are a particular strength of the submission and provides a strong foundation for ecological assessment.

The ornithological survey programme also reflects established methodologies, particularly in the use of vantage point surveys and breeding surveys following recognised guidance. However, as noted above, these methods remain primarily focused on turbine-related survey coverage rather than being explicitly designed around habitat suitability or territory structure. While this approach is widely used, the earlier recommendation to incorporate more targeted, species-specific survey design does not appear to have been fully progressed.

The monitoring programme itself is detailed and comprehensive, and demonstrates a commitment to tracking ecological outcomes and adapting management where necessary. This is a positive feature of the project and aligns well with current best practice in ecological management. At the same time, as with the Appropriate Assessment, it is important to recognise that monitoring supports, rather than replaces, a fully resolved assessment at application stage.

Biodiversity Management and Enhancement Plan

The Biodiversity Management and Enhancement Plan represents a positive development and sets out a range of measures aimed at improving habitat conditions. The inclusion of the



Hen Harrier Project scorecards within this framework is particularly noteworthy, as it introduces a recognised and structured method for assessing habitat quality and management outcomes. This adds clarity to the monitoring process and provides a useful tool for evaluating changes in habitat condition over time.

However, the application of these scorecards is primarily within the context of monitoring and enhancement areas, and their use could be further strengthened by integrating them more directly into the wider assessment. For example, the scorecards are not clearly used to establish a consistent baseline of habitat suitability across the site, nor to quantify changes between existing and proposed conditions. In addition, their application appears to focus mainly on foraging habitat, with less emphasis on nesting habitat suitability.

While these are areas for potential further development, the inclusion of the scorecards nonetheless represents a constructive step towards a more structured and transparent evaluation of habitat management measures.

Taken together, the EIA documentation demonstrates a thorough and well-structured approach in many respects, but there remains scope to strengthen the integration between survey data, habitat assessment, and the ecological requirements of key species such as Hen Harrier.

Summary

The Department notes that the additional documentation represents a clear effort to expand and strengthen the ecological assessment and includes a number of positive developments such as the Biodiversity Management and Enhancement Plan, the detailed monitoring programme, and the use of Hen Harrier habitat scorecards. Notwithstanding these improvements, it remains difficult to conclude that all of the previously provided recommendations have been fully addressed. In particular, greater clarity would be beneficial in relation to species-specific survey design, population-level impact assessment, the treatment of habitat loss and displacement, and the consideration of ecological factors such as nesting success and predation risk. While the inclusion of habitat scorecards represents a positive step, it is currently focused on monitoring and could be further integrated into the overall assessment framework. Overall, the documentation would benefit from clearer linkage between baseline data, predicted impacts and the effectiveness of proposed mitigation measures, in order to provide a more complete and transparent assessment of potential effects on Hen Harrier.



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,

A handwritten signature in blue ink, which appears to read 'Julie Sullivan', is written above a horizontal line.

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration