

From: [LAPS](#)
To: [SIDS](#)
Subject: FW: SID application ACP-324279-26; Windfarm application in Tipperary
Date: Friday 3 July 2026 14:45:23
Attachments: [image001.png](#)
[SID-OY-2026-024.pdf](#)

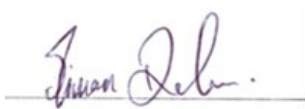
From: Simon Dolan (Housing) <Simon.Dolan@npws.gov.ie>
Sent: Friday 3 July 2026 14:29
To: LAPS <laps@pleanala.ie>
Subject: SID application ACP-324279-26; Windfarm application in Tipperary

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A chara,

Attached please find the Nature Conservation & Archaeological observations.

Regards,



Simon Dolan

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage
Executive Officer

Aonad na nIarratas ar Fhorbairt
Development Applications Unit

Oifigí an Rialtais
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Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90



Your Ref: ACP-324279-26

Our Ref: SID-OY-2026-024

(Please quote in all related correspondence)

3 July 2026

The Secretary
An Comisiún 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): Windfarm application under RED III within the townlands of Cloonaheen, Ballincor Demesne, and Curralanty, Co. Offaly, and Clonfree, Castletown and Cronekill, Co. Tipperary.

A chara

I refer to correspondence received 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 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 IAC Ltd (EIAR Chapter 13; date May 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. It is noted 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 also advises that this can be addressed by the inclusion of an appropriate condition, if the development is permitted.

Notwithstanding this, 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 (IAC Ltd; date May 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 Department of Housing, Local Government and Heritage, 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 Department of Housing, Local Government and Heritage, 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 13 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 of Housing, Local Government and Heritage 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 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 a Natura Impact Statement (NIS) has been prepared as part of the planning application for the proposed wind farm, by Tobin. The Department has the following comments/observations to note:

Otter

The Department notes that the Biodiversity Chapter of the EIAR includes details on a potential otter holt that was identified in 2022; *“In 2022, a potential Otter holt was identified along a drainage ditch connected to the Little Brosna_040 RWB, located approximately 80 m from an access track between T7 to T10”*. This holt was subsequently deemed to be inactive following update surveys in 2023, 2024, and 2025. This information is not detailed within the NIS, and as significant effects were identified on the River Shannon Callows SAC, of which otter is a QI, this should have been included and considered within the NIS. Furthermore, no reasoning is provided on why this potential holt was deemed inactive. Camera trap surveys are not detailed so it is assumed a camera was not deployed at this potential holt. Further reasoning should be provided on this, and if none can be provided then camera trap surveys to fully assess the status of the potential holt must be carried out.

Furthermore, mitigation is provided in Section 6.2.1.4.2 of the NIS for pre-commencement otter surveys *“A pre commencement otter survey will be undertaken no more than twelve months prior to the start of construction works and updated if works are delayed by more than six months”*. The Department recommends the pre-construction survey is undertaken no more than one month prior to works, particularly at the location of the potential holt mentioned above, but also including a 150m buffer along any watercourse up and downstream of the Proposed Project, to establish if breeding has taken place. The disturbance zone of effects on otter is generally considered to be 150m, as per the NRA (2008)¹ guidance, which also states *“Derogations are also required for any works likely to cause disturbance (e.g. piling and blasting) to active breeding holts (when present within c.150m of a scheme).”*

Invasive species

It is noted within the NIS that two invasive species listed on the Third Schedule, i.e. parrot's feather and Himalayan balsam, were identified within the proposed wind farm boundary. Figure 6-5 of the Biodiversity Chapter of the EIAR also notes that Canadian pondweed was identified within the boundary. The NIS should be updated to reflect this inconsistency between the NIS and the EIAR. In addition, despite the close proximity of the boundary of the wind farm to Sharavogue Bog SAC (i.e. 10m at its closest point) and the presence of invasive species, the potential impact of invasive species on the SAC has not been assessed within Table 5-1, and no mitigation is proposed. An assessment on the potential for significant impacts on the local environment as a result of invasive species has been included in the Biodiversity Chapter, and this should have also been detailed within the NIS. The omission of this impact pathway is inconsistent with the precautionary approach required under Article 6(3) of the Habitats Directive, as the introduction or spread of invasive species has the potential to adversely affect the conservation objectives of the QI habitats.

¹ National Roads Authority (2008). Guidelines for the Treatment of Otters Prior to the Construction of National Road Schemes.



Sharavogue Bog SAC

Groundwater

The NIS notes that *“The GWB indicates that groundwater flow paths in this area are considered to be short due to the bedrock not considered to constitute a major aquifer. Therefore, the Zol for groundwater effects is expected to be no larger than a 100m radius surrounding the proposed project”*. Chapter 9 of the EIAR Hydrology and Hydrogeology states that *“Based on the conceptual understanding, there is no hydrogeological connection to the Sharavogue Bog SAC and therefore no potential significant effects on groundwater flow in the bedrock aquifer or subsoils”*. It is not clear whether any hydrogeological monitoring was undertaken to verify this conceptual understanding or to support the conclusion that there is no hydrogeological connection to Sharavogue Bog SAC. In the absence of site-specific groundwater monitoring data or other empirical evidence, the conclusion appears to solely rely on a conceptual model rather than definitive findings from the site. Given the sensitivity of the habitats within Sharavogue Bog SAC, the NIS must contain complete, precise and conclusive evidence demonstrating the absence of a pathway that could give result in an adverse effect on the site integrity. Further Information is required to conclude beyond reasonable scientific doubt that the proposed wind farm will not adversely affect the conservation objectives of the Sharavogue Bog SAC.

Air Quality

Table 5-1 of the NIS notes that *“considering the distance between the SAC and the proposed project site (ca. 10m) there is potential for impacts as the site occurs inside the Zol for impacts associated with the generation of dust”*, and Table 6-2 of the NIS concludes that *“The Zol for potential dust impacts during the construction phase has been identified as 50 m. The nearest mapped location of this QI habitat is approximately 220 m (straight-line distance) from areas where construction activities with the potential to generate dust may occur (e.g. internal access roads)”*. However, Section 5.1.14 states that dust impacts may occur up to 250m of a construction site with *“the majority of the dust deposition occurs within the first 50 m (IAQM, 2024)²”*. Concluding that the majority of dust disposition occurs within the first 50m does not negate the need to assess the ecological significance of deposition at greater distances, particularly where sensitive Annex I habitats are present. An assessment of critical loads or critical levels for the QI habitats of the Sharavogue Bog SAC has also not been carried out. A quantitative assessment to determine whether dust and associated nitrogen disposition arising from construction activities could exceed the thresholds for the QI habitats within the SAC, must be undertaken. Raised bog and other peatland habitats are particularly sensitive to changes in air quality as a result of atmospheric pollution and excessive nitrogen. A SSCO of Sharavogue Bog SAC includes a target relating to air quality *“Air quality surrounding bog close to natural reference conditions. The total N deposition should not exceed 5kg N/ha/y”*. Furthermore, the applicant has solely relied on the conservation objective document³ for the SAC in ruling out impacts due to the distance of the wind farm from the QI active raised bog habitat, which is based upon reporting from 2012. Update surveys within the SAC to determine the extent of raised bog (including the lagg zone which is vital for the functioning of the bog) should have been carried out by the applicant to ensure the NIS is based upon recent scientific evidence. Further information is requested.

² Holman et al (2014). IAQM Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management, London.

³ NPWS (2015) Conservation Objectives: Sharavogue Bog SAC 000585. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.



Matters relating to Environmental Impact Assessment

Marsh Fritillary

Marsh fritillary butterfly surveys were only carried out in September 2023 for the proposed wind farm. No adult surveys were carried out, which is recommended within the NRA (2008) guidance⁴ to be carried out in late-May/early June. This data is also now over 2.5 years old and as per CIEEM Advice Note on the Lifespan of Ecological Reports & Surveys is complied with, surveys older than 18 months need to be reviewed by a professional Ecologist, and repeat surveys should have been undertaken.

The proposed wind farm will result in a “*profoundly significant permanent effect*” on the local marsh fritillary population. Mitigation measures include; Pre-construction surveys, exclusion zones, translocation of larval webs, translocation of devils-bit scabious, wet grassland management for marsh fritillary, speed reduction measures, and post-construction compliance reporting and monitoring. Following the implementation of the mitigation measures, the applicant has concluded that the effects are “*likely to be not significant*” and residual effects are not anticipated. Given that the translocation of larval webs is not recommended or documented to be successful, and the NRA guidance states that “*the habitat required by marsh fritillaries cannot readily be recreated or translocated*”, the Department does not agree with the conclusion of no residual effects on the local marsh fritillary butterfly.

Marsh fritillary larval webs were only located in two areas of the entire wind farm site, and these two areas are earmarked for development, one of which is a turbine and associated hard-standing, whilst the other is a temporary construction compound. The first step of the mitigation hierarchy is the avoidance of impacts. Whilst the removal/relocation of a turbine location would not be easily achievable, an alternative location for the temporary construction compound should be strongly considered. It does not appear to be demonstrated why this location was chosen for a construction compound, with the assessment just relying on translocation as a successful mitigation measure. There remains a significant degree of uncertainty regarding the effectiveness of the proposed mitigation measures. Therefore, the conclusion of “*no residual effects*” is unsubstantiated, and the Department considers that the assessment does not provide sufficient evidence that the proposed wind farm will not affect the conservation status of the local marsh fritillary population.

A lot of detail is provided within the Biodiversity Chapter of the EIAR in relation to the mitigation measures for marsh fritillary. An easily achievable measure would be to avoid any works within the most sensitive periods for the species, i.e. during the larval dispersal stage and the egg-laying/early larval stage. If works must occur during these months, pre-construction surveys carried out by the ECoW immediately prior to works will determine if any larvae or eggs are present. If any are present, works should be delayed until the butterflies have dispersed. Improving the habitat surrounding the works area should occur as early as possible in the construction stage, to ensure habitat is continuously available for the species.

Raised bog habitat

Raised bog habitat was identified within the northern and central sections of the proposed wind farm site, and conforms to the priority Annex I habitat 7110 *Active raised bog. There

⁴ NRA (2008). Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes



will be no direct loss of this habitat, but works will be within 50m of the habitat as detailed in Section 6.6.3.1.2 of the Biodiversity Chapter of the EIAR, and T4 comes within very close proximity in the cutover bog habitat. Potential impacts on this habitat from dust deposition are identified and considered to have significantly moderate negative effects prior to mitigation. However, an assessment has not been completed on the potential for groundwater impacts on the raised bog habitat as a result of the proposed works. Whilst Section 6.6.4.2.3.3 does conclude *“However, the effect is appraised as not significant, negative, long-term effect on the alteration of groundwater flow (Chapter 9 – Hydrology and Hydrogeology). As such, further indirect effects on PB1 Raised bog habitat are unlikely”*, no detail is provided within Chapter 9 on the indirect effects on raised bog habitat, and therefore the conclusion is unsubstantiated. Further Information must be provided on the potential for groundwater impacts on Annex I raised bog habitat within the proposed development site. The location of T4 will also inhibit any future restoration of the cutover bog habitat that is adjacent to the raised bog, and the potential for relocating this turbine to further away from the raised bog habitat, ideally outside or only partially within the cutover bog should be reconsidered.

Bats

A number of bat surveys were carried out within the proposed wind farm, however only one activity bat survey was undertaken in late September 2025 along the proposed grid connection route. Whilst static detectors are useful in identifying the species utilising the site, they are also limited to specific locations and do not identify flight paths or foraging hot spots. Eight trees with potential roost features will be removed for the proposed wind farm (Section 6.6.3.2.4.1), and a bridge along the GCR was identified as a brown long-eared roost from faecal samples. Activity surveys should have been carried out along areas of suitable foraging and commuting habitat, and at any structures or trees with potential that are within the zone of influence of the wind farm, as per best practice guidance (BCT, 2024).

The Department notes that Turbine 3 and access roads are proposed within existing conifer plantation, which all therefore require bat felling buffers to reduce the risk of barotrauma/mortality from the blades. The felling of this woodland will create edge habitats that were not previously present during the surveys undertaken. In addition, closed canopies such as those within conifer forestry are not generally used by bats so they would not have been recorded in this habitat during surveys. Edge habitat is particularly suitable for pipistrelle bat species, which were identified throughout the site. By increasing suitable habitat for bat species, the Department is therefore concerned that the creation of this edge habitat will potentially guide bat species towards the turbines, therefore increasing the risk of collision/barotrauma. The Department recommends Further Information is provided on this potential impact, with mitigation measures proposed that will address the increased risk of barotrauma/injury of local bat species such as additional planting that will guide bats away from the turbines and forestry edge, or further curtailment measures.

Birds

Transect surveys

Figure 7-2 in the Ornithology Chapter illustrates the transect routes carried out between March 2020 – September 2024, and Figure 7-4 illustrates the transect routes carried out between October 2025 – March 2026. The transects carried out between 2020 and 2024 cover a very small portion of the site, and whilst this is somewhat amended for 2025 – 2026, there is still a number of areas that were not surveyed and/or only surveyed during one season. Generally, two seasons of bird surveys is expected as the minimum for wind farm



developments and the Department is concerned that the data is not sufficient to support the conclusions of the EIAR.

Lighting

The potential impact on birds from lighting on the turbine has not been considered. White (or green) lights are believed to be less attractive to birds than red lights, which may affect nocturnal migrant navigation. The lighting design should consider best practice guidance, such as the recently published NatureScot Information Note on the Effects of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures⁵. A number of mitigation options exist and these are listed in this guidance and must be considered in relation to the proposed development.

Nocturnal surveys

A range of bird surveys were conducted for the proposed wind farm development; however no nocturnal surveys were carried out. A number of migratory bird species such as whooper swan and Greenland white-fronted goose were identified during surveys carried out within the site. These species may use flight corridors between roosting and feeding areas within and adjacent to the proposed project. Night-time surveys are often more useful at identifying commuting routes for these species, and may include vantage point watches at dusk and dawn, thermal imaging cameras, automated acoustic detector monitoring. Given the sensitivities of the area and close proximity to winter foraging sites, the Department advises that nocturnal surveys should have been conducted, as per best practice guidance.

In addition, according to BirdWatch Ireland's map layer tool⁶, which gives a spatial indication of where protected birds are likely to be sensitive to wind energy development, the proposed Wind Farm development is located in an area of sensitivity for barn owls. This was highlighted to the applicant in a pre-application consultation response by this Department. Targeted surveys for this species were not carried out, such as nocturnal surveys, with only desk study data utilised. The ornithology chapter states, "*A recent survey of Barn owl in county Offaly by Lusby et al. (2022) showed the species is recovering and the number of breeding sites has increased in the county in the last 50 years, with west county Offaly containing the highest density of breeding barn owls in Ireland*", and a potential nest site was confirmed within 160m of a turbine location. It is concluded within the Ornithology Chapter that significant effects on this species are not anticipated; however, the Department is concerned with the lack of actual data from the site itself in supporting this conclusion. Further Information is required.

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 Authorities prior to commencement of any works. It is further advised that an appropriately qualified Ecologist is retained as an Ecological Clerk of Works during any operations and a post-operation mitigation compliance report is produced by the Ecological Clerk of Works and submitted to the Local Authority for review.

⁵ <https://www.nature.scot/sites/default/files/2020-10/Wind%20farm%20impacts%20on%20birds%20-%20Turbine%20lighting%20and%20birds%20-%20Information%20Note.pdf>

⁶ <https://birdwatchireland.ie/publications/onshore-wind-renewables-publication/>



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 dark ink, appearing to read 'Julie Sullivan', positioned above a horizontal line.

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration