



Your Ref: ACP-323910-25

Our Ref: SID-LE-2026-021

09 July 2026

The Secretary
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902

Via email: laps@pleanala.ie

Re: Notification to the Minister for Housing, Local Government and Heritage under the Planning and Development Act, 2000, as amended.

Development Proposed wind farm Lissinagroagh, County Leitrim

A Chara,

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated heading:

Nature Conservation

Matters relating to Hen Harrier enhancement measures

The Department highlights the sensitivity of the area for breeding Hen Harrier (*Circus cyaneus*) in relation to the proposed Lissinagroagh Wind Farm, noting the 2-3 pairs identified as utilising lands in and around the project area for nesting and foraging activities. These pairs are known to form part of the Leitrim, Slieve Rushen & Cavan complex (Co. Leitrim, Co. Cavan), which has exhibited a decline of 27% from a peak of 15 pairs in 2015. The Leitrim uplands also form part of the non-designated important breeding areas for Hen Harrier Threat Response Plan (2024-28), providing an important contribution in the aim of restoring the national population to a favourable conservation status.

The Department acknowledges the comprehensive impact assessment process undertaken and recognises the potential significant long-term negative disturbance/displacement



impacts as identified in the EIA in respect of nesting Hen Harrier on site. The Department notes the proposed creation of two Nesting Enhancement Areas (NEAs) respective to two pairs regularly utilising the site via the conversion of coniferous plantation. While the Department expresses a preference for such forest to bog/heath restorations over the use of short-term management activities, the Department notes that the one-year lead-in time for the commencement of felling and enhancement works within the proposed NEAs in advance of construction activities is unlikely to provide suitable nesting alternatives as adequate mitigation for potential disturbance/displacement effects arising. Ongoing enhancement works would therefore be concurrent with construction related disturbances.

As outlined by Goodship & Furness (2022), the precautionary requirement for a maximum disturbance distance buffer of up to 1km from known breeding sites is recommended during highly disruptive activities such as construction works with the associated increased auditory disturbances. Notwithstanding any potential habituation to prior human activity that may currently exist (i.e. local roads), this is judged to be of a low-level in contrast to more substantial disturbances imposed by large construction projects such as windfarm developments. Whilst nesting locations have been noted to alter in response to the temporal availability of suitable habitat within conifer rotations cycles, the southern pair is noted to have remained largely within a core breeding area in close proximity to a number of proposed turbines. The CEMP states that works will commence at the southern end of the proposed wind farm site and therefore would be within the likely disturbance distances of nesting attempts by the southern pair in advance of any future relocation.

The following excerpt from the Biodiversity Management Plan is highlighted with respect to the creation of (NEAs),

“Given that the NEAs located in areas that are currently low yield conifer plantation planted over peat habitats (i.e. are acidic with low nutrient status), with multiple watercourses in the area (i.e. a wet area) and are adjacent to or in proximity to existing heath and bog habitats (i.e. remnant seedbanks likely), the conditions for successful habitat conversion are high. Thus, once forestry is removed, the ground is predisposed to natural re-establishment of heather, bilberry, rush and sedge without requiring intensive intervention, confirming that the NEAs are not low-value or marginal lands but areas with a high predicted probability of successful conversion”.

The Department notes that the creation of high-quality optimal nesting habitat will require sustained management to ensure the provision of adequate heather growth over a number of years and may not be suitable as alternatives within the short-term. Faster-growing species such as dense-sward grasses and thicket-stage scrub may render habitats as suboptimal for Hen Harrier in the absence of adequate ongoing management. Conifer



seeding from adjacent plantations is also expected to occur. Expected timelines for the successful provision of optimal NEAs should therefore be realistic and deliverable. It is therefore recommended that the lead-in time for nesting enhancement works in providing suitable alternatives should be adequately progressed in advance of any potential displacement effects on Hen Harrier from known breeding areas during the construction phase. In addition, the efficacy of successful habitat management within the lifetime of the development should also be deliverable, i.e. the prevention of habitat deteriorations and nesting disturbance/displacement activities.

Matters relating to designated sites

The Department highlights some irregularities in the turbine numbering used between reports within the EIA. In the context of the Natura Impact Statement, the Department draws attention to the location of the Dough/Thur Mountains NHA (site code: 002384) in relation to the proposed turbine locations. Turbines 7 & 8 are noted to be situated close to the western boundary of the NHA in areas identified as of moderately high landscape susceptibility and near the highest risk in relation to peat instabilities. Whilst the site does not form part of the Natura 2000 network and so does not fall within the remit of the Article 6(3) assessment, the national protection of peatlands within the NHA network contributes to Ireland's commitment to restore blanket bog within the context of favourable conservation status. The Department therefore highlights the potential effects of the proposed development upon peat stability and the associated risks to dependent upslope habitats (i.e. upland Blanket Bog within the Dough/Thur Mtns NHA) and to protected downstream habitats and species in the Lough Gill SAC (site code: 001976) and Lough Melvin SAC (000428). The Department highlights that recent peat slippage incidents in Leitrim¹ and Donegal (e.g. Meenbog wind farm) indicate that the ability of standard mitigation methods to cope with extreme dry and wet periods is unclear. Accordingly, the Department is concerned that the proposed design and citing of the turbines is not sufficiently cautionary and the EIA lacks sufficient evidence to support the efficacy of proposed mitigation measures during extreme dry and wet conditions as well as 'normal' conditions.

In addition, the Department recommends that any overlap incurred with the NHA boundary from proposed vegetation control measures within the rotor-swept areas as part of foraging mitigation measures for bats and Kestrel should not result in habitat losses that have not been fully assessed within the context of a protected site.

¹ <https://www.npws.ie/sites/default/files/publications/pdf/shass-mountain-landslide-report-october-2020.pdf>



Archaeology

It is noted that the 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 14; 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. We note that no advance archaeological investigations have been carried out within the PDS to inform the EIAR, other than a walkover survey. We advise 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. We advise that this can be addressed by the inclusion of an appropriate condition, if the development is permitted.

Notwithstanding this, the Department of Housing, Local Government and Heritage, 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 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 (IAC Ltd; date May 2026) shall be implemented in full, except as may otherwise be required 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 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.
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.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.DAU@npws.gov.ie, where used, or to the following address:

The Manager,
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
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A handwritten signature in black ink, appearing to read 'David O'Connor', with a horizontal line underneath it.

David O'Connor
Development Applications Unit
Administration