

From: [Housing Manager DAU](#)
To: [LAPS](#)
Cc: [SIDS](#)
Subject: ACP-324305-26 Proposed development of a 680MW Gas-Fired Generation Station
Date: Tuesday 21 July 2026 15:43:15
Attachments: [20260721 SID-DF-2026-027.pdf](#)

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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 Oidhreachta
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-324305-26

Our Ref: SID-DF-2026-027

(Please quote in all related correspondence)

21 July 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 a 680MW Gas-Fired Generation Station
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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, which was carried out in relation to the proposed development by CRDS Ltd (EIAR Chapter 12, dated April 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. In this regard, the Department notes that the assessment has been informed by both Advance Archaeological Geophysical Survey and Advance Archaeological Test Excavation.

The Department has reviewed the EIAR and advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C4, 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 12 of the EIAR (dated 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 to monitor (licensed under the National Monuments Acts) all site clearance works, topsoil stripping or groundworks associated with the development.
 - a. The use of appropriate machinery to ensure the preservation and recording of any surviving archaeological remains shall be necessary.
 - b. Should archaeological remains be identified during the course of archaeological monitoring, all works shall cease in the area of archaeological interest pending a decision of the planning authority, in consultation with the National Monuments Service of the Department, regarding appropriate mitigation.
 - c. The developer shall facilitate the archaeologist in recording any remains identified.
3. 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.
4. 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 12 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 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

Having reviewed the various documents submitted in support of this application, including the Planning Statement, Environmental Impact Assessment Report (EIAR), Appropriate Assessment (AA) Screening Report and Preliminary Construction Environmental Management Plan (CEMP), the Department considers that in general provided the development of the proposed gas fired power station is undertaken in accordance with the plans submitted and the measures set out in the EIAR and Preliminary CEMP to avoid adverse environmental effects during its construction and operational phases and particularly pollution of site surface water runoff, are implemented in full, then it is unlikely that any significant adverse effects on fauna, flora or ecologically valuable habitats will result from the proposed power plant's development.

However, it is noted that as part of the landscaping of the proposed development it is intended to sow commercially sourced wildflower seed mixtures to establish wildflower meadow areas. Such an approach to the landscaping of the proposed development would not conform to good practice, as the planting of commercially available 'wildflower' seeds, even of Irish origin, in an area such as Kilshane, where wildflower species are already present, could threaten local biodiversity through the cross-pollination of adult plants grown up from the sown seeds with populations of flowers of the same species already occurring in the vicinity.

In this context it should be noted that the All-Ireland Pollinator Plan advises against planting wildflower seed outside a garden setting. To clarify, the following points are taken from the Position Paper by the Dublin Naturalists' Field Club entitled 'The case against 'Wildflower' seed mixtures' which is endorsed by the All-Ireland Pollinator Plan and reproduced on their website.

- Seeds of non-local origin – even if the species are native – introduce new genetic strains which may displace or compromise the local, naturally-occurring flora.
- Local, native species do not need to be sown. Native plants colonise suitable habitats by natural means.



- Seeds which are commercially produced and deliberately sown cannot, by definition, be wild and introducing them to the natural environment does not contribute to addressing biodiversity loss.

The genetic integrity of what remains of rare and ecologically significant native species is therefore threatened by the introduction of seed from external sources. Pollen from these geographical insertions and intrusions cannot be prevented from fertilising the local native stock of the same species or causing hybridisation with other closely related species.

Any wildflower meadows to be incorporated into the landscaping of the proposed development should therefore be established either by allowing the areas where the meadows are to be established to be colonised naturally by wildflowers originating from the soil seedbank and/or by dispersal, or by sowing locally harvested wild plant seeds. Whichever method is used to establish wildflower meadows within the proposed development these meadows may only be maintained in the long term if subjected to an appropriate mowing regime.

Recommendation

In the light of the above, the Department recommends that the Planning Authority should attach the following condition to any permission granted in response to the current application:

That, prior to the commencement of development on site, the applicant should submit to the planning authority for its written agreement an amended landscaping plan, omitting from this plan the sowing of commercially sourced 'wildflower' seeds as proposed in the original landscape masterplan for the proposed development, and instead substituting a methodology for the establishment of wildflower meadows on the development site by germination of wildflowers from the existing site soil seed bank or natural dispersal and the maintenance of these meadows by implementing an appropriate future mowing regime.

Reason: To conserve the genetic diversity of locally occurring wildflower populations.

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,

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration