



Your Ref: ACP-324370-26

Our Ref: SID-TN-2026-029

(Please quote in all related correspondence)

11 August 2026

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

Via email to: sids@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Proposed Strategic Infrastructure Development (SID): For the development of a Wind Farm comprising of 11 no. turbines (and all associated works) in the townlands of Longfordpass North, Longfordpass South, Leigh, Bawnreagh, Clonoura, Noard, Derryhogan, Derryvella, Ballybeg, Lanespark, Newhill and Killeen, Littleton, Co. Tipperary.

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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 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 John Cronin and Associates Ltd (EIAR Chapter 14; date April 2026).

The proposed development is located in proximity to a very large number of Recorded Monuments which are subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1930-2014. The Department note that it will be necessary to



establish exclusion zones during the construction phase for the protection and preservation of certain these known sites. 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). If present, these would be directly impacted by the proposed development.

It is noted that the assessment has been informed by a walkover survey only, as well as non-archaeological advance site investigations works. There has been no comprehensive programme of advance prospection, such as archaeological geophysical survey or advance archaeological test excavation or systematic recent peatland survey, which would provide greater clarity as to the potential presence of sub-surface archaeological features or deposits. The Department do note that there are older peatland surveys from the 1990s and early 2000s which were consulted, but as industrial peat extraction activities continued until 2017, more up-to-date peatland survey is needed.

The Department advise that advance systematic peatland survey and advance archaeological test excavation of all greenfield areas of the PDS 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 advise 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 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 (date April 2026) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. A Project Archaeologist shall be appointed to oversee and advise on all aspects of the scheme from design, through inception to completion.



- a) The Project Archaeologist shall liaise with the Department and the Planning Authority to agree in advance an overall strategy for archaeological works to be carried out both in advance of and in parallel with construction of the development.
 - b) This shall include the scope of any Advance Test Excavation and Archaeological Peatland Surveys, as well as any additional mitigation measures that may be required to protect archaeological heritage (including provision for preservation in situ or preservation by record).
 - c) This shall include the location, extent and method of demarcation for any Exclusion Zones around the external-most elements of vulnerable Heritage Assets that are to be preserved in situ (as identified Chapter 14 of the EIAR or by any subsequent investigations associated with the project).
- 3. The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out a comprehensive pre-development peatland survey of all peatlands within the development site.
 - a) The archaeologist shall liaise with the Department to agree a scope and methodology for the Peatland Survey.
 - b) The report on the Peatland Survey shall include location, written description and classification (as per current National Monuments Service classifications of Peatland sites) for each archaeological siting and also include digital photography, sketch plans and sections as well as relevant peat stratigraphic information and the recording of wood technologies. Threat assessments and recommendations shall also be made for each site.
- 4. The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out a pre-development Archaeological Test Excavation for all areas of proposed ground disturbance and to submit an AIA report for the written agreement of the Planning Authority, following consultation with 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 archaeologist shall liaise with the Department to establish - based on the results of the Peatland Surveys - the appropriate scope of the Archaeological Test



Excavation to adequately characterise the character and extent of any potential sub-surface archaeological material within the development site.

- b) The report on the Archaeological Test Excavation 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.
 - c) Any further archaeological mitigation requirements specified by the Planning Authority, following consultation with the Department, shall be complied with by the developer.
 - d) 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.
5. 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 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.
6. 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, or to the following address:

The Manager
Development Applications Unit (DAU)



Government Offices
Newtown Road
Wexford
Y35 AP90

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A handwritten signature in blue ink, which appears to read 'Julie Sullivan', is placed above the printed name.

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration