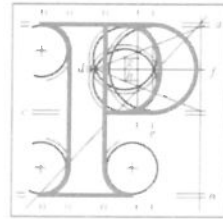


Our Case Number: ACP-324410-26



An
Coimisiún
Pleanála

Department of Housing, Local Government and Heritage
The Manager
Development Applications Unit
Government Offices
Newtown Road
Co. Wexford
Y35 AP90

Date: 18 September 2026

Re: Proposed West Clare Railway Greenway Section 1: Kilrush to Kilkee Project
Kilrush to Kilkee via Moyasta, Co. Clare

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Commission has approved it or approved it with modifications.

If you have any queries in relation to this matter please contact the undersigned officer of the Commission at laps@pleanala.ie

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Kevin McGettigan

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

HA02C

Teil
Glao Áitiúil
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Website
Email

(01) 858 8100
1800 275 175
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

From: David O'Connor (Housing) <David.OConnor@npws.gov.ie>
Sent: Tuesday, September 15, 2026 2:18 PM
To: LAPS <laps@pleanala.ie>
Subject: ACP-324410-26 West Clare Railway Greenway

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A chara

Please find attached Archaeological and Nature Conservation observations/recommendations for the above mentioned ACP notification.

Kindly forward a copy of your decision to manager.DAU@npws.gov.ie as soon as it issues.

In addition, please acknowledge receipt of the attached letter (as required under Article 29(2) of the Planning & Development Regulations 2001).

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: manager.DAU@npws.gov.ie

Kind regards,

David O'Connor
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
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

David.oconnor@npws.gov.ie
Manager.DAU@npws.gov.ie



Your Ref: ACP-324410-26

Our Ref: P800107/2026

15 September 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 Section 51 (2) of the Roads Act, 1993, as amended,

Proposed Development: West Clare Railway Greenway - Section 1 Kilrush to Kilkee
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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 co-ordinated by the Development Applications Unit under the stated heading:

Nature Conservation

The proposed West Clare Railway Greenway Section 1 extends approximately 15.28 km between Kilrush and Kilkee, predominantly following the former West Clare Railway corridor. The route passes through agricultural land and skirts Poulfnasherry Bay, a tidal bay connected to the Shannon Estuary.

The ecological assessment identifies three European sites within the Zone of Influence in the EIAR, namely:

- Lower River Shannon SAC (002165);
- Kilkee Reefs SAC (002264);
- River Shannon and River Fergus Estuaries SPA (004077).



The Department acknowledges that considerable ecological survey work has been undertaken. Surveys have been carried out across multiple years, including habitat, otter, badger, bat, wintering bird, breeding bird and invasive-species surveys.

However, the Department considers that the sensitivity of the Poulnasherry Bay area, the proximity of the proposed greenway to European-sites and the scale of the proposed new development warrant a particularly precautionary approach.

Appropriate Assessment / European Sites

The NIS and associated ecological information have been reviewed. The principal European site concerns relate to:

- disturbance and displacement of wintering waterbirds;
- water quality and pollution;
- impacts associated with the seven watercourse crossings;
- Otter connectivity;
- recreational pressure; and
- cumulative/in-combination effects.

The Department considers that the identification of these pathways is appropriate, but further information is required before the conclusion of no adverse effect on site integrity can be accepted with sufficient certainty.

Wintering birds – Poulnasherry Bay.

Poulnasherry Bay is important for wintering waterbirds and the application would introduce a substantial new recreational use along the former railway corridor.

The Department notes the predicted visitor numbers and the potential for disturbance from:

- pedestrians and cyclists;
- dogs;
- noise;
- visual disturbance; and
- people accessing areas outside the designated path.

The Moyasta Bridge area is of particular concern due to its proximity to intertidal habitat.

Screening and mitigation

The proposal relies substantially on visual screening to reduce disturbance.

The Department welcomes the proposed screening and monitoring measures but notes that the NIS itself acknowledges that direct evidence demonstrating the effectiveness of screening in this context is limited.



Further information should therefore demonstrate how screening will work in practice and how its effectiveness will be monitored.

Monitoring / adaptive management

A detailed monitoring programme should be provided, including:

- wintering bird distribution;
- disturbance responses;
- visitor numbers;
- dog/off-route access;
- roost use;
- screening effectiveness; and
- clear trigger levels and corrective measures.

Monitoring should be capable of leading to actual changes in management where adverse effects are identified.

Construction

The proposed restriction on works in sensitive bird areas during the wintering period is welcomed. The Department recommends that sensitive areas and seasonal restrictions are clearly mapped and secured through the construction environmental management arrangements.

Otter and ecological connectivity

The Department recommends that all watercourse crossings and fencing arrangements maintain wildlife connectivity, particularly for Otter.

Screening / raptor predation

The design of screening and planting should avoid creating artificial predator perches overlooking important bird habitat.

Cumulative effects

The Department considers that cumulative recreational pressure requires consideration, including the potential combined effect of Sections 1–4 of the West Clare Railway Greenway and other recreational developments. The assessment should demonstrate that increased visitor numbers will not result in significant cumulative disturbance to wintering birds.



Conclusions

The Department acknowledges the extensive ecological assessment and the mitigation proposed. However, given the importance of Poulfnasherry Bay for wintering waterbirds, the scale of the proposed recreational use and the uncertainty surrounding the effectiveness of screening and disturbance mitigation, the Department considers that the matters outlined above warrant further consideration.

Archaeology

It is noted that the EIAR submitted as part of the planning application incorporates a desk-based Archaeological Impact Assessment (AIA) which was carried out in relation to the proposed development by IAC Ltd (EIAR Chapter 16; date June 2026). The Department has reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.

Therefore, the Department advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C4 and C5 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 Conditions:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 16 of the EIAR (date June 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 Archaeological Test Excavation and Archaeological Monitoring, 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 in Chapter 16 of the EIAR or by any subsequent investigations associated with the project).



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 16 of the EIAR (date June 2026) 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
Y35 AP90

Is mise, le meas

David O'Connor
Development Applications Unit
Administration