From:	Housing Manager DAU
To:	SIDS
Cc:	LAPS
Subject:	ACP-324632-26 Proposed 220kV Air Insulated Substation and Loop-in Grid Connection at Greenhills Solar Farm
Date:	Tuesday 3 November 2026 16:59:59
Attachments:	20261103 SID-CK-2026-047.pdf

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Our Ref: SID-CK-2026-047

Good afternoon,

Attached are heritage 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

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

Your Ref: ACP-324632-26
Our Ref: SID-CK-2026-047
(Please quote in all related correspondence)

3 November 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 220kV Air Insulated Substation and Loop-in Grid Connection at Greenhills Solar Farm

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).

Nature Conservation

The following observations are made in the context of this Department's role in relation to nature conservation, including as a prescribed authority under planning legislation. The observations are not exhaustive and are offered to assist Cork County Council in meeting the nature conservation obligations that arise in respect of this proposed development, and the screening for appropriate assessment.

The development site is upstream of the Blackwater Special Area of Conservation with direct hydrological connection. Cork County Council should ensure that there are no significant effects on the water quality of this NATURA 2000 site through potential water quality, pollution and sedimentation/surface water run-off effects during either the construction or usage phases. This includes potential impacts of any water abstraction required for washing of panels, any additives to the water and the control of used water run-off and potential impacts of any herbicides used to control vegetation etc.

All TII Badger, Bat and Otter guidelines should be rigidly adhered to and made a condition of planning.

Fencing does not seem to have been dealt with. Regarding the buffer between the development fencing and the hedgerows the gap should be as wide as possible and at a minimum should match the setback proposed for hedgerows. Regarding the presumably required security fencing it is recommended that there be a minimum 30 centimetres x 30 centimetres gap between the base of the fence and the ground to allow wildlife to pass through and that this access gap could be left around the entire base of the fence. However, in addition there should also be suitably designed larger gaps or gates periodically at suitable intervals along the security fencing. Fencing/access mitigation will be very important in terms of reducing the biodiversity impact from the project as it will allow the site to continue to be used by wildlife and therefore reduce loss of habitat for species. It has been noted regarding other solar farm sites that there have been usage/continued accessibility issues post construction. Monitoring the effectiveness of the above wildlife/mammal access features should be a condition of any planning granted.

It is noted that 395 metres of hedgerow are proposed for removal. It is unclear how much of this is near the bat roost on site or currently used by commuting bats. The proposed planting should be in place prior to removal and the above clarification would steer where it should be planted in relation to the bats on site. Removal should be outside the bird nesting season.

Regarding the badger setts, a pre-construction survey should also take place, this will be particularly important where there is a time lag between the initial biodiversity survey and the commencement of site clearance works. It should take place immediately prior to construction to ensure no significant change in the findings of the baseline ecological survey has occurred. Trail cameras should also be used to check occupancy if there is a doubt regarding species utilisation. The applicable sections of TII Guidelines for badgers should be followed.

It is recommended that a management option of mowing the area between the hedgerows and the actual site fence line once a year around or after 1 August should be considered. This would help create natural meadow habitat as per the following (which is also relevant for internal grassland management within the fence line).

Many Ecological Impact Assessment reports promote planting wildflower seeds, however, appropriate ecological advice is required when creating wildflower meadows or rough grassland margins. Natural regeneration of naturally occurring wildflowers and grasses, through appropriate management of a site, is considered best practice. Avoid planting

wildflower seed mixes as these can be detrimental to biodiversity; simple changes to grass management practices can be more effective and less costly. Creating ornamental meadows and margins is considered a garden or horticultural action, this may help flower visiting insects but does not hold the same value for the natural environment as creating a natural grassland. Natural grasslands develop due to specific local site conditions; geology, climate, soil, natural seed bank and past management practices. It is important to understand and to manage expectations when creating a natural grassland for biodiversity enhancement at a site. Expert advice is available at https://pollinators.ie/wildflower-seed/expert-opinions. It is important to follow best practice and have a site-specific plan.

To assess collision risk, a programme of operational phase Bird and Bat Fatality Monitoring should be carried out to fully monitor the operational phase impacts from bird or bat collision with the infrastructure of the proposed development. The monitoring programme shall cover all relevant infrastructure. The monitoring should have clear targets and indicators. This data should be readily accessible and used to inform future solar farm developments. Without effective monitoring and follow-up, each new project operates from the same baseline for biodiversity and as a result it is more likely that issues will perpetuate beyond each project.

Bats are subject to a regime of strict protection pursuant to the requirements of the Habitats Directive (92/43/EEC) as transposed in Irish law in Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended).

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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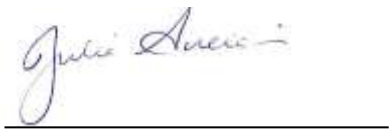

Julie Sullivan
Assistant Principal
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Administration