



Your Ref: ABP-321238-24

Our Ref: **SID-RN-2024-33**

(Please quote in all related correspondence)

15 January 2025

The Secretary
An Bord 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): The SID is an application for the Moyvannan Electricity Substation which consists of i) A 110 kilovolt (kV) 'loop-in/loop-out' Air-Insulated Switchgear (AIS) electricity substation, including a single-storey control building (with a Gross Floor Area of 450 square metres) and all associated electrical equipment and services within a 2.6 metre high fenced compound (with a total footprint of 8,400 square metres); (ii) Replacement of 1 no. existing wooden pole-set with 2 no. lattice-type interface masts, each of which will be between 15 and 18 metres in height, to facilitate connection of the 110kV underground electricity lines to the existing Athlone-Lanesborough 110kV overhead electricity transmission line; (iii) Approximately 270 metres of 110kV underground electricity line between the electricity substation and the interface masts; (iv) Approximately 630 metres of access tracks with associated upgrade works to an existing agricultural entrance from the L7551 local road; (v) Approximately 7.5 kilometres of 110kV underground electricity line between the electricity substation and the junction of the L7636 local road and R363 regional road where the electricity line will connect to electricity cables permitted as part of the Seven Hills Wind Farm (An Bord Pleanála Reference ABP-313750-22). The electricity line will be placed within private lands and within the carriageway of the L7551 L7556, L2018, L7731, R362, L2023, and L7636; and, (vi) All associated and ancillary site development, excavation, construction, landscaping and reinstatement works and the provision of site drainage infrastructure and surface water protection measures at Moyvannan, Feamore, Lisbaun, Carrownolan, Carrowncloghan, Carrowkeeney, Ardmullan, Curraghboy, Gortnasythe, Derryglad, Eskerbaun, and Brideswell, County Roscommon.

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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 headings.

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 Dermot Nelis Consultant Archaeologist (EIAR Chapter 10; date October 2024).

The proposed development is located in proximity to a number of Recorded Monuments which are subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1930-2014. 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).

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 10 of the EIAR (Dermot Nelis Consultant Archaeologist; date October 2024) 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 Department, regarding appropriate mitigation.
 - c. The developer shall facilitate the archaeologist in recording any remains identified.



- d. Any further archaeological mitigation requirements specified by the Planning Authority, following consultation with the Department, shall be complied with by the developer.
3. 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 13 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.

Nature Conservation

It is noted that the project area is located between Lough Ree Special Protection Area (SPA) to the North East and the River Suck Callows SPA to the South West. The Department has concerns regarding potential impacts on Whooper Swan flight lines that may intersect the project area between these sites. Dawn/dusk movements of birds between roosting and foraging areas may occur within the site, but it is noted that the majority of the winter bird surveys (Appendix C in the Natura Impact Statement (NIS)) took place during mid-morning to mid-afternoon. Only a small number of surveys coincided with dawn and dusk.

Whilst the report did not identify any sightings of Whooper Swan utilising lands within the project area, birds were observed on the turloughs to the South/South West. The potential therefore exists for such flight lines to transect the area of overhead lines or areas of construction but not have been recorded.

It is recommended that clarification of the data or acquisition of additional data at the appropriate time of day be requested to address this observation.

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:



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Julie Sullivan
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Administration