

From: [Housing Manager DAU](#)
To: [SIDS](#)
Subject: ABP-320705-24 Proposed development of 9 no. wind turbines, 110kV substation and ancilliary development
Date: Wednesday 5 August 2026 09:27:39
Attachments: [SID-CL-2024-28.pdf](#)

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Good morning,

Please find attached heritage-related observations and recommendations of this Department for the above-mentioned consultation.

Please acknowledge receipt of same.

Kind regards,
Amy

Amy Thornton
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: ABP-320705-24

Our Ref: SID-CL-2024-28

(Please quote in all related correspondence)

5 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): Proposed development of 9 no. wind turbines, 110kV substation and ancilliary development, townlands in Co Clare and of Court, Co Limerick.

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

Appropriate Assessment

Lesser Horseshoe Bat (Qualifying Interest species of Dane's Hole, Poulnalecka Special Area of Conservation (SAC) (Site Code: 000030) and Ratty River Cave SAC (Site Code: 002316)

Loss of foraging habitat and connectivity

The applicant's response has not satisfactorily addressed the concerns expressed by this Department in its previous submission on this development, in relation to loss of Lesser Horseshoe foraging habitat and connectivity.

The level of Lesser Horseshoe activity recorded on the static detectors is significant considering the low detectability and range of the species' echolocation call and is an



indication of extensive use of the site by Lesser Horseshoes. As outlined by this Department in its previous submission, conifer plantations can contain considerable local-scale structural diversity and, due to their height and density, can provide a range of sheltered foraging microhabitats. Well-developed edge habitat such as broadleaved fringes of forest roads, and other linear topographical features such as forestry banks and drains also serve as high-quality commuting corridors, enhanced by the sheltered and dark conditions.

Vegetation clearance associated with the proposed development will, as discussed previously, lead to a decrease in core foraging habitat area for Dane's Hole, Poulnalecka SAC and in supporting habitat area for Ratty River Cave SAC, as well as a reduction in foraging habitat for several additional roosts, which may be interconnected with the SAC roosts. It is also likely to result in a deterioration in habitat quality due to the removal of well-developed, sheltered edge habitat along forestry roadsides. Any proposals for replacement planting would need to take account of the likely considerable temporal gap between planting, and maturity to sufficient quality (including structural quality); and also be informed by a comprehensive understanding of Lesser Horseshoe spatial and seasonal usage of the site, including existing preferred commuting corridors and foraging sites at the microhabitat level, to ensure that the current level of landscape and inter-roost connectivity, as well as habitat quality, is maintained. Based on the information provided, an adverse effect on the integrity of Dane's Hole, Poulnalecka SAC and of Ratty River Cave SAC as a result of the proposed development cannot be ruled out.

Hen Harrier (Annex I species)

Habitat loss

The applicant has provided an explanation for the use of a 250 metre avoidance distance (from the turbine), rather than 500 metres, as a basis for calculating habitat loss resulting from the proposed development. However, this Department notes the following: -

- The finding of the Pearce-Higgins *et al* study (cited by the applicant) of >50% reduction in Hen Harrier activity within 500 metres of turbines;
- The use of a 500 metres avoidance distance in the applicant's response to Clare County Council when assessing cumulative impacts, which response also contains the following:
 - *"This 500m distance was chosen as Pearce-Higgins et al (2009) identified, for a range of species, significant avoidance of turbines between 250m and 500m. It therefore follows that significant effects are unlikely at distances greater than 500m."*



- The Ruddock and Whitfield (2007) review (also cited by the applicant) which identified a disturbance distance of 500 – 750 metres for breeding and resting Hen Harrier locations;
- The fact that these studies were based on a lower hub height. Although it is acknowledged that no equivalent information exists for modern hub heights, this and the previous points would indicate that the use of a 500 metres disturbance distance would be advisable, taking the precautionary approach.

While the area proposed for deforestation as an enhancement measure in the Biodiversity Management Plan (54.2 hectares) is almost equivalent to the (currently) calculated area of habitat that will be lost due to disturbance, it will be less than the area of habitat loss recalculated using a 500 metre radius. The proposed farmland enhancement measures are concerned with preserving existing habitat which is already available to Hen Harriers and could not be seen as directly offsetting (in terms of habitat area) the loss of existing habitat due to disturbance.

The cumulative assessment does not account for the position of groups of turbines relative to each other, resulting in apparently available areas (i.e. outside the disturbance buffer) being rendered unavailable by the arrangement of surrounding turbines discouraging Hen Harrier access and effectively fragmenting the remaining habitat. There would appear to be potential for this, including fragmentation at landscape scale, in the middle section of the mapped upland area in Fig 3.

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
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Y35 AP90



Is mise, le meas

A handwritten signature in blue ink, reading "Julie Sullivan".

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration