



Planning Ref: 2460050

28 March 2024

Dear Sir/Madam

**Re: 2460050: development which will consist/consists of: a 10-year permission for the development of a solar farm on a site of 140 hectares consisting of the following: 781,578sqm of solar photovoltaic panels on ground mounted steel frames; 17 hardstanding locations for the installation of electrical skids; new internal access tracks; underground power and communications cables and ducts, including along the L-5802, R-393, L-5913, L-1811 and the L-5808 public roads; a new access point and an upgrade to an existing access point along the R-393 public road and a new access point along the L-5808 public road; landscaping and biodiversity enhancement measures; boundary fencing; and all associated ancillary development, site works and services. The solar farm will be operational for 40 years at Ballysallagh, Kildallan and other townlands, Co Westmeath**

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development control and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

#### GENERAL

The Heritage Council support efforts to increase renewable energy rollout in Ireland. Increased global temperatures and changing climate patterns will pose risks to natural ecosystems and habitats. Therefore, we acknowledge the need to roll out renewable energy schemes, to reduce the country's carbon emissions.

It is also important to note that this is a relatively new frontier in the Irish land use planning landscape. The number of applications for solar farms are increasing and the Heritage Council wish to contribute constructively to how these developments interact with our natural and built heritage.

Due the scale of some of the solar farms being proposed, and their specific locations, presumably south facing aspects, there will inevitably be a land use impact with archaeology, given the prevalence of ringforts (*dun, lios or rath*), as well as other archaeological sites, in the Irish countryside. In addition, there is a need to ensure that solar farm development does not undermine biodiversity ambitions.

#### Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),  
Michael Farrell, Dr. John Patrick Greene, Sammy Leslie,  
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John G. Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampail,  
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,  
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E [mail@heritagecouncil.ie](mailto:mail@heritagecouncil.ie)

[www.heritagecouncil.ie](http://www.heritagecouncil.ie)



This solar farm complex is divided into three parcels – northwestern, northeastern and southern. We have studied the application documentation, with particular emphasis on the Archaeology Report and Ecological Impact Assessment Report. Our comments are therefore confined primarily to archaeology and the biodiversity aspects of the scheme. They are divided as per the following:

1. Built and Cultural Heritage
  - Archaeology
2. Natural Heritage
  - Habitats and Ecology

### *Built and Cultural Heritage*

#### **Archaeology**

There are a relatively large number of archaeological sites both around the development sites and within the northwestern parcel. There are eight structures listed on the national inventory of architectural heritage (NIAH), 7 of which are protected structures under the Westmeath County Development Plan 2021-2027, which have been identified in the Archaeological Report. In addition, the Heritage Council note and welcome the geophysical survey undertaken on the lands proposed to accommodate the solar farm. 9 areas of additional archaeological activity were identified across the 3 parcels.

It does appear that the northwestern parcel is the most acute in terms of archaeological potential, with assets present within the site, immediately adjacent, or within the Zone of Notification (ZoN) encroaching on the site. We welcome the approach to the site development, as detailed in Map 051009-DR-201, whereby the solar panels are indicated to stop at the ZoN for the following assets:

- a ringfort (WM011-110),
- an earthwork (WM011-084),
- and an enclosure (WM011-172)
- a holy well (WM011-083)

In addition, we note that the fencing that surrounds the boundary at the locations where these archaeological assets are present, will be set back to correspond with the ZoN, and supported on concrete shoes, and that further archaeological buffers for both fulachta fias (WM011-111002-, WM011-111001) and the historic complex (identified via the geophysical survey) will be incorporated into the scheme. This is welcomed.

In the northeastern parcel the geophysical survey has identified archaeological activity (enclosures), and similarly concrete shoes are suggested at these locations within these parcels. We would ask that this is made more explicit in the relevant drawings i.e. 051009-DR-202. Whilst it is written in the notes, it should be more discernible on the drawing

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**www.heritagecouncil.ie**



itself. This is also the case for the southern parcel, where similar non-invasive mechanisms will be used in the vicinity of the archaeological anomalies identified in the geophysical survey. We, therefore, in general terms, recommend that Westmeath County Council ensure that compliance with the drawings, as provided, will be fully enforced by condition. This should include the archaeological buffer exclusion zones, as identified, and the proposed mitigation for the additional areas of archaeological activity discovered (i.e. the installation of the panels via concrete shoes/non-invasive methods).

In addition, for the cabling works for the grid connections, the archaeology report has identified monitoring in these locations, and this should also be included as a condition of planning permission. The test trenching mitigation recommendation also detailed in this report should also be included by condition. We would also suggest that an archaeologist be on site when works are being undertaken both around the zone of notification in the case of the archaeological buffers, as well as for construction works for the installation of the solar panels on the newly discovered areas of archaeological activity.

## NATURAL HERITAGE

### Habitats and Ecology

There are several internationally and nationally protected sites within close proximity to the development site. Lough Owel SAC/ SPA and the Lough Iron SPA are particularly close, with the latter being a few hundred metres away from the site boundary. Walshestown Fen and the Royal Canal pNHA are also located nearby. We would recommend that there be a condition on construction site management to ensure that no siltation/ or construction surface runoff or pollution impact on these heritage features.

In addition, detailed habitat analysis based on the Heritage Council's Fossitt *Guide to Habitats in Ireland* has been provided. The proposed development site is characterised by improved grassland (GA1), however there are pockets of species rich wet grassland (GS4) identified in the northwestern parcel. There are also important hedgerows (WL1) and treelines (WL2) surrounding the land parcels with water courses also present (FW2).

Firstly, the exclusion of the species rich wet grassland, and the pond identified, from the development in the northwest parcel is welcome and to be commended. It is noted that there will be approximately 60 metres of hedgerows lost to facilitate access to the site, with 250 metres to be provided via enhancement planting, with over 12 kms of new hedgerow proposed. Again, this is welcome, but we would suggest that existing natural features (treelines and hedgerows) be protected as much as possible, given the importance of trees and hedgerows for foraging and shelter for several species. We would also suggest that the possibility for retaining those trees that were identified as having bat roost potential be explored.

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Charity reg. no 20036867

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It also welcomed that field margins and the riparian zones along streams will be managed as per Bride EIP project guidelines. We would recommend however that given solar farm operations desire no overshadowing of the PV panels, that some condition for a specific strategy be included for how the field margins/hedgerows and trees will be managed. Specific emphasis on the vitality of Fraxinus Excelsior (Ash) specimens would be needed in this regard and opportunities to rejuvenate/ gap filling of hedgerows should be pursued. Breeding birds will only nest at certain heights, and we recommend that the National Biodiversity Data Centre's [guidance](#) on hedgerow planting be included in such strategy.

On other points we recommend:

- IFI are consulted on matters related to watercourses.
- No felling or removal of vegetation during the bird breeding season, and the timing and season of bird surveys should be made more explicit
- Greater detail on the hedgerow composition, to be included in the suggested strategy for field margins.
- Presence of ecologists/bat specialists during the construction phase
- Preconstruction surveys (immediately before the construction begins) for badger setts/presence of badger.

Finally, solar farms and the environmental impacts are a new endeavour in Irish land use planning. There are elements of ecological mitigation/retention that should be commended in this scheme. We would however suggest to Westmeath County Council and the applicant that there is a unique responsibility to monitor these early consents to inform future developments. Matters of ecological impact could be monitored i.e. will common snipe/ meadow pipit frequent the retained wet grassland during the operation or is the 'lake effect', glint/glare of solar farms leading potentially to avian collisions a valid concern? Or will species richness increase due to potentially less fertilizer use or will the vegetation community shift to more shade tolerant plants? Therefore, a monitoring condition on such ecological impacts could be included for the lifetime of the solar farm. This would be a good scientific contribution that could be used to mitigate the negative impacts (there will be negative impacts on the habitat of snipe and meadow pippet) of the scheme and would inform future developments.

## CONCLUSION

Solar farms will be a feature of the Irish landscape going forward. The Heritage Council support renewable energy rollout, but not at all costs. We are keen to constructively contribute to ensuring that good design and heritage considerations are properly addressed in rolling out such infrastructure. In this specific case we note that heritage assets appear to be well considered, and we recommend that Westmeath County Council fully condition the application to conform with the drawings as provided; and that the

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mitigation identified in both the archaeological report and ecological impact assessment be captured by way of condition.

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