

Our Case Number: ABP-320946-24



An
Coimisiún
Pleanála

Development Applications Unit
The Manager
Newtown Road
Wexford
Co. Wexford
Y35 AP90

Date: 17 September 2025

Re: Development at Long Point, Lake Road (R351)
Knockanima, Loughrea, County Galway

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent letter in relation to the above mentioned proposed development. The contents of your letter have been noted.

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,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

HA06

Teil
Glao Áitiúil
Facs
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Riomhphost

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64 Sráid Maoilbhríde
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64 Marlborough Street
Dublin 1
D01 V902

Lauren Griffin

From: Lauren Griffin
Sent: Tuesday, 16 September 2025 11:51
To: Simon Dolan (Housing)
Subject: RE: S177AE Application - Public realm enhancement works at Long Point, Loughrea, Co. Galway

A Chara,

The Commission acknowledges receipt of your email; official correspondence will issue in due course.

Kind regards,

Lauren

From: Simon Dolan (Housing) <Simon.Dolan@npws.gov.ie>
Sent: Friday, September 12, 2025 2:21 PM
To: LAPS <laps@pleanala.ie>
Subject: S177AE Application - Public realm enhancement works at Long Point, Loughrea, Co. Galway

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,

Attached please find the Archaeological & Nature Conservation recommendations.

Regards,



Simon Dolan

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

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



Planning Ref: S177AE Long Point
(Please quote in all related correspondence)

12 September 2025

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email: laps@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended

Proposed Development: S177AE application for Public realm enhancement works

A chara

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Archaeology

Underwater Archaeology:

The consultation documents, including the submitted Underwater Archaeological Impact Assessment report (Mizen Archaeology June 2025) have been reviewed by the Department. It is noted that the proposed development site is located in proximity to Recorded Monument GA105-236--- (Deer park), which is subject to statutory protection in the Record of Monuments and Places (RMP) established under Section 12 of the National Monuments (Amendment) Act 1994. It is noted that the proposed development also includes lacustrine construction activities that may lead to significant effects on Lough Rea's underwater cultural heritage protected by Section 3 of the National Monuments (Amendment) Act 1987. The Underwater Archaeological Impact Assessment (UAIA) (Section 7) concludes that:

'Given the significance of the crannogs, historical accounts of fluctuating water levels, and evidence for earlier shorelines, the area is assessed as having high archaeological potential. Furthermore, the survey confirmed that the lakebed sediments offer ideal anaerobic conditions conducive to the preservation of archaeological material. Disturbance to the lakebed will be minimal and limited to localised works associated with the repair of the existing pier and slipway, the

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Newtown Road, Wexford, County Wexford, Y35 AP90



construction of a circular viewing deck to the south of the existing pier, and modifications to the existing beach area, including the installation of a deck, steps, and a ramp providing access to the water's edge. However, such disturbance has the potential to negatively directly impact on previously unrecorded buried archaeological remains. The viewing platform will have a positive overall operational impact as it will enhance the ability for members of the public to view the archaeological sites within the lake'.

In light of the potential for significant effects on underwater cultural heritage, as outlined above, the Department recommends that the following Condition is attached, should planning be approved by the local authority.

Archaeology

1. All recommendations and mitigation measures as set out in the submitted Underwater Archaeological Impact Assessment report (Mizen Archaeology, June 2025) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.

Archaeological Monitoring (Terrestrial)

2. Archaeological monitoring of terrestrial works shall be undertaken as follows:
 - a. The services of a suitably qualified and experienced, to the satisfaction of the Department of Housing Local Government & Heritage, archaeologist shall be engaged to carry out full-time archaeological monitoring of all construction activities that involve ground disturbance or demolition of historic fabric, structures or features, and of any works where materials of archaeological importance may be uncovered.
 - b. The archaeological monitoring shall be carried out by a suitably qualified and experienced, to the satisfaction of the Department of Housing Local Government & Heritage, archaeologist, under a Section 26 (National Monuments Act 1930) excavation licence and in accordance with an approved method statement.
 - c. A Finds Retrieval Strategy shall be implemented and agreed with the Department of Housing Local Government & Heritage, as part of the archaeological licence application. This shall include for systematic finds retrieval and metal detection of all spoil, which shall be undertaken by a suitably qualified and experienced archaeologist working under a Detection Device consent (Section 2 1987 National Monuments Act). All monitoring works that have the potential to uncover human skeletal remains shall be undertaken in conjunction with a suitably qualified and experienced osteoarchaeologist. Secure finds storage that ensures the protection and conservation of wet and dry finds, including human skeletal remains, shall be provided within the construction site compound.
 - d. Sufficient, suitably experienced and qualified to the satisfaction of the Department of Housing Local Government & Heritage archaeologists shall be in place to ensure continuous archaeological monitoring of Project works. An archaeological team shall be on standby to deal with any rescue excavation and may be augmented as required.



- e. In order to ensure full communication is in place between the monitoring archaeologist(s) and the works contractor(s) at all times, a communication strategy shall be implemented that facilitates direct archaeological monitoring of all construction activities that involve ground disturbances or demolitions and of any works where materials of archaeological importance may be uncovered. Adequate notice (minimum four weeks) of all forthcoming works that require the attendance of the monitoring archaeologist(s) shall be provided by the works contractor.
- f. Should suspected/verified archaeological structures, features, deposits or sites and/or archaeological objects, be identified during the course of the archaeological monitoring activities, the monitoring archaeologist shall be authorised by the Developer to suspend all construction activities on the affected area (as defined by the monitoring archaeologist). The Developer shall immediately institute a Temporary Archaeological Exclusion Zone (TAEZ) to the proposed find location and its environs (as defined by the monitoring archaeologist) and all construction activities shall immediately cease within the TAEZ in order to facilitate investigative assessment, protection and prompt notification to the Department of Housing Local Government & Heritage and other statutory authorities, as required.
- g. Following assessment of the newly discovered archaeological materials, the Developer shall undertake any ensuing mitigating action as is required by the Department of Housing Local Government & Heritage. Mitigation shall prioritise redesign or partial redesign to facilitate full or partial preservation in situ. Mitigation may also include archaeological excavations ('preservation by record'), archaeological test-excavations, stabilisation/conservation works and/or archaeological monitoring, underwater archaeological inspection by means of archaeological diving, underwater archaeological surveys, or any combination of the above or any other mitigation measures as may be recommended by the Department of Housing Local Government & Heritage. No construction activities shall recommence within the Temporary Archaeological Exclusion Zone until formally agreed in writing with the Department of Housing Local Government & Heritage. Where ensuing mitigation is required, no archaeological works shall be undertaken until after an amended method statement that describes the mitigation strategy has been submitted, reviewed and agreed in writing by the Department of Housing Local Government & Heritage. All resulting and associated archaeological costs shall be borne by the Developer.
- h. The planning authority and the Department of Housing Local Government & Heritage 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 works and any post-excavation analysis, scientific dating programmes, palaeoenvironmental analysis, geoarchaeological analysis, conservation of archaeological objects, as required by the Department of Housing Local Government & Heritage and the National Museum of Ireland. Where significant archaeological discoveries are made, they shall be fully published in an appropriate academic format. All post excavation and publication costs shall be borne by the Developer.



Archaeological Monitoring (Underwater)

3. Archaeological monitoring of instream/lake-margin construction works shall be undertaken as follows:
 - a. The services of a suitably qualified and experienced, to the satisfaction of the Department of Housing Local Government & Heritage, maritime/underwater archaeologist shall be engaged to carry out full-time archaeological monitoring of all in-stream/lake margin construction activities or works with the potential to impact on underwater cultural heritage.
 - b. The archaeological monitoring shall be carried out by a suitably qualified and experienced, to the satisfaction of the Department of Housing Local Government & Heritage, maritime/underwater archaeologist, under a Section 26 (National Monuments Act 1930) excavation licence and in accordance with an approved method statement.
 - c. A Finds Retrieval Strategy shall be implemented and agreed with the Department of Housing Local Government & Heritage as part of the archaeological licence application. This shall include for the systematic spreading of all dredged material at a suitable repository to facilitate hand-searching and metal detection for finds retrieval, to be undertaken by a suitably qualified and experienced archaeologist working under a Detection Device consent (Section 2 1987 National Monuments Act). All monitoring works that have the potential to uncover human skeletal remains shall be undertaken in conjunction with a suitably qualified and experienced osteoarchaeologist. Secure finds storage that ensures the protection and conservation of wet and dry finds, including human skeletal remains, shall be provided within the construction site compound. The Finds Retrieval Strategy shall address the likely post-excavation requirements for all archaeological objects, including those from an underwater environment, including recording, finds processing, analysis and long-term conservation of material recovered during the project.
 - d. Sufficient, suitably experienced and qualified, to the satisfaction of the Department of Housing Local Government & Heritage, underwater archaeologists shall be in place to ensure continuous archaeological monitoring works. An archaeological team shall be on standby to deal with any rescue excavation and may be augmented as required. An archaeological dive team shall be on standby in the event that underwater archaeological inspection is required by means of archaeological diving. All dive surveys shall be licenced (Section 3 1987 National Monuments Act) and shall include handheld metal detection survey, which shall also be licenced (Section 2 1987 National Monuments Act).
 - e. In order to ensure full communication is in place between the monitoring archaeologist(s) and the works contractor(s) at all times, a communication strategy shall be implemented that facilitates direct archaeological monitoring of all in-stream/lake margin construction activities or works with the potential to impact on underwater cultural heritage. The monitoring archaeological shall be provided with adequate notice (minimum eight weeks) of all forthcoming works that require their attendance.



- f. Should suspected/verified archaeological structures, features, deposits or sites and/or archaeological objects, including wrecks, be identified during the course of the archaeological monitoring activities, the monitoring archaeologist shall be authorised by the Developer to suspend all construction activities on the affected area (as defined by the monitoring archaeologist). The Developer shall immediately institute a Temporary Archaeological Exclusion Zone (TAEZ) to the proposed find location and its environs (as defined by the monitoring archaeologist) and all construction activities shall immediately cease within the TAEZ in order to facilitate investigative assessment, protection and prompt notification to the Department of Housing Local Government & and other statutory authorities, as required.
- g. Following assessment of the newly discovered archaeological materials, the Developer shall undertake any ensuing mitigating action as is required by the Department of Housing Local Government & Heritage. Mitigation shall prioritise redesign or partial redesign to facilitate full or partial preservation in situ. Mitigation may also include archaeological excavations ('preservation by record'), archaeological test-excavations, stabilisation/conservation works and/or archaeological monitoring, underwater archaeological inspection by means of archaeological diving, underwater archaeological surveys, or any combination of the above or any other mitigation measures as may be recommended by the Department of Housing Local Government & Heritage. No construction activities shall recommence within the Temporary Archaeological Exclusion Zone until formally agreed in writing with the Department of Housing Local Government & Heritage. Where ensuing mitigation is required, no archaeological works shall be undertaken until after an amended method statement that describes the mitigation strategy has been submitted, reviewed and agreed in writing by the Department of Housing Local Government & Heritage. All resulting and associated archaeological costs shall be borne by the Developer.
- h. The planning authority and the Department of Housing Local Government & Heritage shall be furnished with a final archaeological report describing the results of all underwater archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological works and any post-excavation analysis, scientific dating programmes, palaeoenvironmental analysis, geoarchaeological analysis, conservation of archaeological objects, as required by the Department of Housing Local Government & Heritage and the National Museum of Ireland. Where significant archaeological discoveries are made, they shall be fully published in an appropriate academic format. All post excavation and publication costs shall be borne by the Developer.

Construction Environment Management Plan

4. The Construction Environment Management Plan (CEMP) shall be updated to include the location of any and all archaeological or underwater cultural heritage constraints relevant to the proposed development as set out in the Underwater Archaeological Impact Assessment report. 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 underwater cultural heritage environment during all phases of site preparation and construction activity.

Nature Conservation

These observations are intended to assist you in relation to identifying potential impacts on European sites, other nature conservation sites, and biodiversity and environmental protection in general, in the context of the current proposal.

Lough Rea SAC is one of the most important sites for habitat 3140 in the country and one of the few assessed as in good condition (last monitored in 2018, see IWM 124¹). The Conservation objective for the Lough Rea SAC [000304] is to maintain the favourable conservation condition of Hard oligo-mesotrophic waters with benthic vegetation of *Chara* spp. The attribute 'Habitat area' should be stable or increasing, subject to natural processes. The area proposed for the construction of an upgraded kayak slip, accessibility slip, a Crannóg viewing platform, and a new boardwalk are located within mapped area of this Qualifying Interest habitat.

The NIS states: "*The lake habitat adjacent to the Proposed Development site, classified as Limestone/marl lake, conforms to Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. as mapped in the Site-Specific Conservation Objectives (SSCOs) of Lough Rea SAC. Species recorded within the habitat are indicative of this Annex I habitat... In the shallower lake areas adjacent to the Proposed Development site where there is higher exposure, Chara species were infrequent to absent, and comprised of larger boulder substrate". Following the field surveys, it was noted that Chara spp. within the footprint of the Proposed Development were sparse and did not represent high quality areas of this QI*".

The 3140 habitat is characterised by vegetation zones that are related to water depth. Shallow water is typified by sparse charophyte cover and dominant cyanobacterial crust cover, owing to the natural water level fluctuations, wave action and substratum found in this zone. The Department disputes the assertion that sparse charophyte cover does not 'represent high quality areas of this QI'. It could represent the typical vegetation of the specific zone and could even indicate high quality and good condition. To confirm that, it would be necessary to conduct a cyanobacterial crust survey and identify the charophytes to species. (as per IWM 125²).

Should consent be granted, the following conditions should be considered:

- Pre-construction cyanobacterial crust survey to determine quality of QI habitat in the proposed infrastructure footprint. Impacts to high quality habitat should be avoided.

¹ <https://www.npws.ie/sites/default/files/publications/pdf/IWM124.pdf>

² <https://www.npws.ie/sites/default/files/publications/pdf/IWM125.pdf>



- Pre-construction survey to determine whether there are ground water springs or seepages discharging at proposed infrastructure locations and avoid any potential impacts.
- The Department acknowledges the Habitat enhancement plan. Open fringing habitats (species-rich, dry semi-natural grassland) are generally preferable for habitat 3140, although some areas of woodland or reed bed are good in terms of habitat heterogeneity.
- It is noteworthy that IWM 124 highlights that the important and abundant cyanobacterial crust at Lough Rea is approaching the thresholds between Good and Poor in terms of chlorophyll content, suggesting nutrient (phosphorus) pressures. Therefore, fertilisation of 'amenity grassland' should be minimised/eliminated.

The Department takes this opportunity to remind Galway County Council of their obligations under Article 6 of the Habitats Directive (92/43/EEC). Competent national authorities, are to authorise activity only if they have made certain that it will not adversely affect the integrity of a European site and, consequently, not likely to give rise to deterioration or significant disturbances within the meaning of Article 6(2). Any matters raised above should also be considered in the planning policy context for the proposed development, including the protective natural heritage and biodiversity objectives and policies in the Galway County Development Plan.

You are requested to send 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

Simon Dolan
Development Applications Unit
Administration