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Comhairle Chontae na Gaillimhe Galway County Council

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
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18th September 2025

AN COIMISIÚN PLEANÁLA	
LDG-	_____
ACP-	_____
25 SEP 2025	
Fee: €	_____ Type: _____
Time: 9.15	By: <i>Ryan</i>

Case Reference: JP07.322952: Proposed construction of a pedestrian footbridge over the Owenriff River, Oughterard, Co. Galway.

Re: Submission – DAU- 01.09.25 from the Development Applications Unit.

A Dhuine Uaisle

Galway County Council welcomes the comments of the Development Applications Unit on the Cultural Heritage Impact Assessment report (AMS Ltd June 2025) forming part of the planning submission for the project.

The AMS Ltd report confirms that no known archaeological sites or monuments will be adversely affected by the proposed project and concludes that the new footbridge will make a positive contribution to the amenity of the Owenriff river and the character of the Architectural Conservation Area in Oughterard.

With a view to the mitigation of any potential adverse impact on buried archaeological remains that might remain to be discovered, within the footprint of the project, the AMS Ltd report proposes licensed archaeological test excavations in areas of construction work. Any remains that might be discovered would either be preserved *in situ* or fully investigated.

The DAU letter endorses this approach ('Archaeological Recommendation', pages 2–3), prescribing archaeological testing and reporting—and also licensed metal detecting—as the main elements in the further assessment of the site. Galway County Council is committed to supporting this work if the project is approved.

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The DAU letter also prescribes archaeological monitoring at construction stage ('Archaeological Monitoring', pages 3–4). However, this was not proposed in the AMS Ltd report. In agreement with AMS Ltd and on the advice of Jerry O'Sullivan, TII, Project Archaeologist {per the *Code of Practice for Archaeology* (2017) agreed between the Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs, and Transport Infrastructure Ireland}, Galway County Council would like to propose an alternative approach, described as follows.

Galway County Council propose that the amount of advance archaeological testing (including metal-detecting) in construction areas should be extensive enough to eliminate the risk of any significant archaeological remains being found on site at construction stage.

Typical archaeological testing regimes on public transport infrastructure projects (i.e. TII-funded projects) comprise a sample of 10-15% of the total site area. Given the rather small footprint of the present development, that amount can easily be increased, subject to the recommendations of the National Monuments Service, and this should offset the need for construction monitoring, if the project is approved.

The benefits of this approach are two-fold:

- 1) It is a more sensitive approach to potential buried archaeological features. Significant features are much more likely to be found intact if they are discovered in the controlled circumstances of a licensed test excavation, as opposed to ground-breaking construction work, which necessarily has a different objective and different methods, and
- 2) The discovery and investigation of any significant archaeological remains that may exist, by licensed archaeological testing in advance of construction work, will avoid potentially costly interruptions to the main contractor's programme of work at construction stage.

In short, advance archaeological testing is more effective at discovery, has better outcomes for the fragile archaeological resource than monitoring at construction stage, and has better outcomes for programme management at construction stage. This is the approach that has generally been adopted on TII-funded projects throughout Ireland for the last 25 years and all to very good effect.

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Galway County Council acknowledge that any person who discovers significant archaeological remains has a duty in law to protect them and to report them to the appropriate authorities—including the main contractor for the Oughterard Footbridge project. Galway County Council do not believe, however, that this will be a likely outcome on the present site, following comprehensive advance archaeological testing, as proposed above.

Galway County Council trust that this proposal is acceptable.

Is mise, le meas

Uinsinn Finn

Director of Service – Physical Infrastructure, Fire and Emergency Services and
Climate Change

Galway County Council