

Our Case Number: ACP-323442-25



An
Coimisiún
Pleanála

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

Date: 29 September 2025

Re: Proposed Development for N58 Strade River Bridge Rehabilitation Works
Strade, County Mayo

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Commission has approved it with or without modifications.

If you have any queries in relation to the 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

AA02

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Ríomhphost

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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Lauren Griffin

From: LAPS
Sent: Monday, 29 September 2025 12:49
To: 'Housing Manager DAU'
Subject: RE: S177AE Strade River Bridge

A Chara,

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

Kind regards,

Lauren

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Monday, 29 September 2025 12:41
To: LAPS <laps@pleanala.ie>
Cc: Bord <bord@pleanala.ie>
Subject: S177AE Strade River Bridge

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.

ACP-323442-25

A Chara,

Attached please find the Heritage observations/recommendations of the Department in relation to the aforementioned 177AE Application.

Can you please confirm receipt of same?

Kind Regards,
Diarmuid

Diarmuid Buttimer
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
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

Diarmuid.Buttimer@npws.gov.ie



Your Ref: **ACP-323442-25**
Our Ref: **S177AE Strade River Bridge**

29 September 2025

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

Via email to laps@pleanala.ie ; bord@pleanala.ie

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

177AE Application: Mayo County Council: N58 Strade River Bridge Rehabilitation: In the townlands of Knockshanbally and Strade, County Mayo.

A chara

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

The following submission by the Department of Housing, Local Government and Heritage provides An Coimisiún Pleanála with separate observations of the underwater archaeological unit and the terrestrial archaeological unit

Archaeology – (Underwater Unit)

Planning Submission, Cultural Heritage

The proposed works will involve the demolition of the 1980's bridge deck and its replacement with a new deck and parapets at the same location, reducing the height of the existing abutments and demolishing the central bridge pier and replacing the existing raised concrete apron below the bridge with a new reduced height apron. It is noted that the plans and particulars submitted as part of the planning application to An Coimisiún Pleanála incorporates a desk-based Archaeological Impact Assessment (AIA) which was carried out in relation to the proposed development by Richard Gillespie, Mayo County Council Archaeologist (April 2025). The report identifies and assesses the impact and any likely significant effects on cultural heritage, including archaeological, architectural heritage and underwater cultural heritage assets. Its desk study includes a review of primary and secondary historical sources and notes 'The works will encroach on the 'zone of notification' of one National Monument / Recorded Monument. It is on the outer edge of the Zone of Notification for MA070-067001- (Religious House -Dominican Friars); MA070-067004- (Graveslab); MA070-067005 (Religious House -Franciscan Friars); MA070-067006-



(Graveyard) and other associated monuments.’ The report concludes that ‘There is no predicted direct impact on the Abbey, however there is potential for further subsurface archaeological remains’ and archaeological monitoring and ‘a wade and metal detection survey of the river bed and banks, immediately adjacent to the modern bridge is also recommended’.

Legal Codes and Policy Context

Archaeological monuments are afforded statutory protection in the Record of Monuments and Places (RMP) established under section 12 (Recorded Monuments) of the National Monuments (Amendment) Act 1930-2014. The *Frameworks and Principles for the Protection of the Archaeological Heritage* (Department of Arts, Heritage and the Gaeltacht and the Islands 1999, see section 3.6.1(3) and 3.6.4) sets out national policy on the protection of the archaeological heritage in the course of development. It includes emphasis on the non-renewable nature of the archaeological heritage, the need to always consider its preservation in-situ as the first option, and also the need to carry out appropriate levels and forms of archaeological assessment in advance of development.

Section 3 of the National Monuments (Amendment) Act 1987 is the primary piece of legislation for the protection of wrecks over 100 years old and archaeological objects underwater, irrespective of age. Wrecks that are less than 100 years old and archaeological objects underwater or the potential location of such a wreck or archaeological object can also be protected under Section 3 of the 1987 (Amendment) Act. Underwater Cultural Heritage also encompasses a broad range of saltwater and freshwater heritage, the protection of which is provided for in legal codes. The Wreck Inventory of Ireland Database (WIID) is the official register of historic shipwrecks protected under the National Monuments Acts. All wrecks over 100-years old are protected under the 1987 and 1994 (Amendment) Acts of the National Monuments Acts. Over 18,000 wrecks have been recorded to date, ranging from small fishing boats, dugout canoes and coastal traders to steamships and ocean going ships. Though earlier sources have been included where obtainable, the Inventory is largely based on documentary sources available from after 1700 AD. As such, previously unrecorded wreck sites, including those dating to earlier periods, may await discovery in the marine area under consideration here.

The assessment of the project that has been undertaken facilitates the Department to determine its likely significant effects on archaeological including underwater cultural heritage, resulting from the construction of the project and whether the proposed mitigation measures would adequately allow for the avoidance, reduction or offsetting of significant effects. The Department broadly concurs with the proposed mitigation measures as set out in the AIA report and in order to ensure the project aligns with statutory obligations, policy and guidelines for the protection of the State’s archaeological heritage, as set out above, it is recommended the following CONDITIONS are attached to any approval that may issue from An Coimisiún Pleanála. Note these recommended conditions align with Sample Conditions 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 archaeological assessment.

Archaeological Recommendations:

Underwater Archaeological Impact Assessment

1. An Underwater Archaeological Impact Assessment (UAIA) report shall be submitted to the Department for approval and shall include the results of the following:
 - a. Desk based assessment that addresses the recorded and potential underwater cultural heritage (including historic wrecks, archaeological objects, terrestrial archaeological heritage, built heritage, vernacular heritage, riverine heritage and industrial heritage) of the proposed development area, to include a full inventory, mapping and surveys (photographic, descriptive, photogrammetric, as appropriate) of all identified underwater cultural heritage features and structures.
 - b. Wade/dive survey, accompanied by a hand-held metal detection survey, centred on (but not confined to) the area(s) where in-stream works are proposed, including the proposed locations of enabling works, coffer dams and any machinery movements that may affect the riverine environment. The wade/dive assessment and metal detection survey shall be undertaken by a suitably licenced and experienced underwater archaeologist. All identified and potential underwater cultural heritage shall be surveyed (photographic, descriptive, photogrammetric) in detail as part of the assessment and shall include detailed assessment of each of the wrecks it is proposed to remove from the harbour area.
 - c. A Dive/Survey licence (Section 3 1987 National Monuments Act) and a Detection Device consent (Section 2 1987 National Monuments Act) will be required for the dive/wade survey and metal detection, respectively.
 - d. The final Underwater Archaeological Impact Assessment (UAIA) shall be submitted to the Department for review and approval, prior to the commencement of any construction works. The UAIA report shall contain a detailed Archaeological Impact Statement that addresses all identified or potential impacts on identified or potential underwater cultural heritage and shall also make recommendations on measures to avoid (through the institution of Archaeological Exclusion Zones) or, where necessary, mitigate (by archaeological dive surveys/archaeological test excavations/archaeological geophysical surveys/archaeological monitoring/preservation by record or any other means as may recommended by the Department) all potential/identified impacts and effects on underwater cultural heritage. The Developer shall be prepared to be advised by the Department in this regard or in regard to any subsequent recommendations that may issue. No construction works shall be undertaken until formal approval in writing from the Department has been received by the Developer.



Archaeological Monitoring (Underwater)

2. Archaeological monitoring of in-stream/river bank construction works shall be undertaken as follows:
 - a. The services of a suitably qualified and experienced, to the satisfaction of the Department, maritime/underwater archaeologist shall be engaged to carry out full-time archaeological monitoring of all in-stream/riverbank 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, maritime/underwater archaeologist, under a Section 26 (National Monuments Act 1930) excavation licence or Section 14 Ministerial Consent Nominated Archaeologist and in accordance with an approved method statement.
 - c. A Finds Retrieval Strategy shall be implemented and agreed with the Department, 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, 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 construction activities or works with the potential to impact on underwater cultural heritage. The monitoring archaeological shall be provided with adequate notice (minimum four 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 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. 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. No construction activities shall recommence within the Temporary Archaeological Exclusion Zone until formally agreed in writing with the Department. 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. All resulting and associated archaeological costs shall be borne by the Developer.
- h. 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 works and any post-excavation analysis, scientific dating programmes, palaeoenvironmental analysis, geoarchaeological analysis, conservation of archaeological objects, as required by the Department 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

- 3. The Construction Environment Management Plan (CEMP) shall be updated to include the location of any and all underwater cultural heritage constraints relevant to the proposed development. 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.



Archaeology – Terrestrial

It is noted that a Cultural Heritage Impact Assessment (CHIA) submitted as part of the planning application incorporates a desk-based Archaeological Impact Assessment (AIA) which was carried out in relation to the proposed development by Richard Gillespie, Mayo County Council Archaeologist (date April 2025).

Therefore, the Department of Housing, Local Government and Heritage advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C4 and C5 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 the Cultural Heritage Impact Assessment (date April 2025) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. A Project Archaeologist shall be appointed to oversee and advise on all aspects of the scheme from design, through inception to completion.
 - a. The Project Archaeologist shall liaise with the Department and the Planning Authority to agree in advance an overall strategy for archaeological works to be carried out both in advance of and in parallel with construction of the development.
 - b. This shall include the scope of any Advance Test Excavation and Archaeological Monitoring as well as any additional mitigation measures that may be required to protect archaeological heritage.
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 the Cultural Heritage Impact Assessment (date April 2025) 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.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie :

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise le meas,

Diarmuid Buttiner
Development Applications Unit
Administration