

Niamh Hickey

From: SIDS
To: LAPS
Subject: RE: SID application ACP-324258-26; Tirawley Windfarm Project in Co. Mayo

From: Simon Dolan (Housing) <Simon.Dolan@npws.gov.ie>
Sent: Wednesday, June 24, 2026 2:43 PM
To: LAPS <laps@pleanala.ie>
Subject: SID application ACP-324258-26; Tirawley Windfarm Project in Co. Mayo

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 observations.

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



Your Ref: ACP-324258-26
Our Ref: SID-MO-2026-016

(Please quote in all related correspondence)

24 June 2026

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

Via email to laps@pleanala.ie

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

Proposed Strategic Infrastructure Development (SID): Tirawley Windfarm Project in Co. 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

Archaeology

It is noted that the Environmental Impact Assessment Report (EIAR) submitted as part of the planning application includes a desk-based Archaeological Impact Assessment (AIA), which was carried out in relation to the proposed development by John Cronin and Associates (EIAR Chapter 14; date April 2026).

The proposed development is located in proximity to a number of Recorded Monuments that are subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994. The wider landscape within which the proposal is located has a rich archaeological heritage dating back to the Mesolithic. In particular, the area of north Mayo from Killala Bay west to Belderrig is characterised by relict Neolithic and Bronze Age landscapes surviving beneath the blanket bog, characterised by extensive field systems, habitation and ritual sites (notably megalithic tombs). The best-known example is the Céide fields c. 10 km to the northwest of the proposal that encompasses an area of at least 300ha.

More pertinent to this proposal, however, are the extensive examples at Rathlacken (c. 350m to the northwest of AT15 at its nearest extent) and Carrowmore (c. 700m to the northwest of AT12 at its nearest extent). The pre-bog field system at Rathlacken (MA007-016001-) has been mapped across an approximate area of c. 55ha incorporating three court tombs (MA007-016006-; MA007-016007-; MA007-016008-), while that at Carrowmore (MA007-081001-) has been mapped across an area of c. 100ha incorporating a court tomb (MA007-032001-) an unclassified megalithic tomb (MA007-081013-) and a hill-top cairn (MA007-031-

Aonad na nIarratas ar Fhorbairt, Oifigí an Rialtais, Bóthair an Bhaile Nua, Loch Garman, Y35 AP90

Development Applications Unit, Government Offices, Newtown Road, Wexford, Y35 AP90

manager.dau@npws.gov.ie

www.gov.ie/housing



---). Smaller areas of pre-bog field walls have also been mapped in the immediate environs of the court tomb at Athleague (MA014-010---)—extending across c.1.5ha—and the court tomb at Barnhill (MA014-011002-)—extending across c. 20ha. The proposed new access road running south from turbines AT7 to AT10 towards turbines AT5-6 appears to extend through a section of greenfield lands that incorporate the easternmost known extent of the Barnhill field system (MA014-011001-). This potential direct impact has not been identified or assessed in the EIAR.

The Department notes that while these pre-bog field systems have been identified as vulnerable sites within the EIAR, their proximity to the proposed development has been inappropriately assessed. The separation distances stated in Chapter 14 of the EIAR reflect distance from the centre-point of these monuments not the nearest extent. While this may be an acceptable methodology for relatively compact archaeological sites (such as hut sites or even megalithic tombs) for archaeological sites of this type that extend over multiple hectares, proximity must always be assessed from the outermost known extent of the site. The consequences of this are best demonstrated by the failure to identify and assess the potential direct impact to the Barnhill field system (MA014-011001-), as noted above.

The EIAR acknowledges that there is a general potential that previously unknown sub-surface archaeological features or deposits may be present within the proposed development site (PDS) which may be negatively impacted by the proposed development (EIAR Section 14.4.1). The EIAR notes the rich archaeological potential from peatland areas in particular (EIAR Section 14.3.14.1), so it is assumed that the PDS must incorporate surviving section of blanket bog cover. However, it is unclear from the descriptions of the PDS to what degree and at what locations blanket bog may still be present within the PDS. The EIAR has identified 12 megalithic tombs of varying morphologies in immediate proximity to the PDS with four of these within c. 500m of proposed infrastructure. It is possible that any surviving blanket bog within the PDS (even if currently under forestry) could preserve prehistoric landscapes associated with these monuments. The only way to confidently assess the extent of any such prehistoric landscapes (and any potential direct impacts) is through direct prospection.

In that regard, it is noted that no advance archaeological investigations have been carried out within the PDS to inform the EIAR, other than a walkover survey. Impact assessments must be informed by an adequate characterisation and understanding of the baseline archaeological and cultural heritage environment. While noting that part of the PDS is currently under forestry (which has restricted access even for walkover survey), no prospection measures (e.g. whether non-intrusive or intrusive as possible or appropriate in the circumstances, including by reference to protection of habitats) were carried out at part of the baseline research in the fully accessible sections of the PDS to directly assess the potential for sub-surface archaeological features, deposits or artefacts to be present. In the event that permission is granted, the Department strongly advises that advance archaeological test excavation should be carried out in advance of any development works to determine if previously unknown sub-surface archaeological features or deposits are present. If such material is present, then additional mitigation measures to ensure the preservation in situ (through redesign or omission) or preservation by record (i.e. full archaeological excavation) of such discoveries will be necessary. It is advised that this can be addressed by the inclusion of an appropriate condition, if the development is permitted.

A number of National Monuments in Ownership or Guardianship of the Minister and sites subject to a Preservation Order are located within 10km of the PDS. These monuments are subject to statutory protection under Section 14 of the National Monuments Act 1930-2014. The Department notes that for two of these—Rathfran Abbey (NM 269) and the ecclesiastical complex at Carn (PO 11/1983)—the EIAR indicates that the proposed development would



have a long-term significant indirect impact to the setting of the monument, if permitted. It is also noted that a moderate indirect impact to setting is also predicted for the following National Monuments—Rathfrankpark Wedge Tomb (NM 633), Rathfrank Stone Circle (NM 269) and Rosserk Abbey (NM 104). As noted in the EIAR (Section 14.5.4) these effects cannot be addressed through mitigation.

If it is determined that this project can be granted permission, then 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 C3, 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 EIAR.

Archaeological Requirements:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 14 of the EIAR (John Cronin and Associates; date April 2026) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in areas of proposed ground disturbance and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the Department of Housing, Local Government and Heritage, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works.
 - a. The report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in-situ, preservation by record (archaeological excavation) and/or monitoring may be required.
 - b. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the Department of Housing, Local Government and Heritage, shall be complied with by the developer.
 - c. No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority.
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 Chapter 14 of the EIAR 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 of Housing, Local Government and 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 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 or to the following address:

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

Is mise le meas,

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration