

From: [Karen Byrne](#)
To: [SIDS](#)
Subject: FW: Appeal referral ACP-324308-26; Mayo
Date: Monday 10 August 2026 08:03:19
Attachments: [image001.png](#)
[ACP-324308-26 MCC.pdf](#)

From: Appeals2 <appeals@pleanala.ie>
Sent: Thursday 6 August 2026 17:14
To: Karen Byrne <K.Byrne@pleanala.ie>
Subject: FW: Appeal referral ACP-324308-26; Mayo

From: LAPS <laps@pleanala.ie>
Sent: Thursday 6 August 2026 15:28
To: Appeals2 <appeals@pleanala.ie>
Subject: FW: Appeal referral ACP-324308-26; Mayo

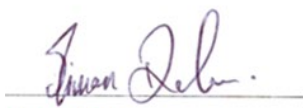
From: Simon Dolan (Housing) <Simon.Dolan@npws.gov.ie>
Sent: Thursday 6 August 2026 15:09
To: LAPS <laps@pleanala.ie>
Subject: Appeal referral ACP-324308-26; Mayo

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A chara,

Attached please find the Nature Conservation and 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-324308-26
Our Ref: SID-MO-2026-025

(Please quote in all related correspondence)

6 August 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): The proposed development will consist of a 13-turbine wind farm development, with an associated 110 kV substation, battery energy storage system (BESS), and all associated works on land within the townlands of Muingmore (An Mhoing Mhór), Doolough (Dumha Locha), Tristia (Troiste), Moneynierin (Moing an Iarainn) and Bangor (Baingear), County Mayo.

A chara

I refer to correspondence received 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 SLR Environmental Consulting (Ireland) Ltd (EIAR Chapter 12; date May 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. One of these sites—MA025-044---- (Crannóg)—is located within the boundary of the proposed development site (PDS) but will not be impacted by the proposal.

However, the general archaeological potential of the PDS—the potential for unknown sub-surface archaeological to be present—has been poorly characterised in the EIAR. In that regard, no advance archaeological investigations have been carried out within the PDS to inform the EIAR, other than a walkover survey.

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The PDS comprises mainly peatland which is (for the most part) currently under forestry. This means that any development will require substantial tree-felling activities as well as standard construction groundworks. Peatlands, generally, are rich reservoirs of our archaeological heritage, supporting the preservation of unique archaeological sites and artefacts that do not otherwise survive in dryland contexts. The character of the peat formation at the site is not discussed in the EIAR. The presence of a crannóg within the PDS and two further sites of this type closely adjacent to it might infer that it is raised bog, but it is equally possible that it is blanket bog (as noted in passing Chapter 7 of the EIAR at Section 7.45).

In addition to the archaeological sites and artefacts that can be preserved within the peat deposits themselves, blanket bog has frequently been found to preserve palaeo-landscapes that pre-date the peat formation. The survival of complex pre-bog landscapes is perhaps best known in north Mayo generally west of Killala Bay to Belderrig where there are multiple examples of Neolithic to Bronze Age date. However, they are not unique to that locale and examples have been found elsewhere in county Mayo as well as other counties along the western seaboard with large tracts of blanket bog cover. These palaeo-landscapes are commonly characterised by field systems extending over multiple hectares (several hundred in the case of the largest examples). In the absence of a proper programme of peatland survey at the PDS such survival cannot be excluded. The EIAR in fact notes the present of a megalithic Court Tomb (RMP026-002001-) located 1.5km east of PDS confirming a Neolithic presence in the local landscape.

The EIAR suggests that previous peat harvesting and current forestry may have removed any archaeological sites (Section 12.92). However, there is still peat in situ over most of the footprint of the proposed development and Chapter 6 of the EIAR notes that borehole site investigation indicated a maximum peat depth of 5.6m. It is possible that any surviving blanket bog cover within the PDS (even if currently under forestry) could preserve pre-bog palaeo-landscapes in addition to any potential archaeological survivals within the peat deposits themselves. The only way to confidently assess this (and any potential direct impacts) is through direct prospection.

The Department considers that, given the scale of the project and, in particular, the extent of ground disturbance that will be required both from tree-felling and construction that negative effects to unknown sub-surface archaeological features or deposits are likely to occur. The absence of any substantive measures in the EIAR to mitigate such effects or any commitments to carry out post-consent assessments (test excavation or peatland surveys) means that any such potential effects would have to be considered significant in magnitude. It is advised that this can be addressed by the inclusion of an appropriate set of conditions if the development is permitted.

If it is determined that this project can be granted permission, then the Department 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. The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out a comprehensive pre-development peatland survey of all peatlands within the development site.
 - a. The archaeologist shall liaise with the National Monuments Service (NMS) to agree a scope and methodology for the Peatland Survey.
 - b. The report on the Peatland Survey shall include location, written description and classification (as per current National Monument Service classifications of Peatland sites) for each archaeological siting and also include digital photography, sketch plans and sections as well as relevant peat stratigraphic information and the recording of wood technologies. Threat assessments and recommendations shall also be made for each site.
 - c. 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.
 - d. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service, shall be complied with by the developer.
 - e. 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.
2. The developer shall engage a suitably qualified archaeologist to monitor (licensed under the National Monuments Acts) all site clearance works (including removal of tree-stumps as part of felling), topsoil stripping or groundworks associated with the development.
 - a. The use of appropriate machinery to ensure the preservation and recording of any surviving archaeological remains shall be necessary.
 - b. Should archaeological remains be identified during the course of archaeological monitoring, all works shall cease in the area of archaeological interest pending a decision of the planning authority, in consultation with the Department of Housing, Local Government & Heritage regarding appropriate mitigation.
 - c. The developer shall facilitate the archaeologist in recording any remains identified.
 - d. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the Department of Housing, Local Government & Heritage, shall be complied with by the developer.
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. 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 & 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.

Underwater Archaeology

It is noted that the PDS is a former area of wetlands that contains Recorded Monument MA025-004---- crannóg and that further crannóga are located within its environs. Accordingly, and notwithstanding the PDS has been extensively modified by forestry and modern interventions, it can be considered to be an area of potential for Underwater Cultural Heritage (UCH) and likely significant effects on this cultural heritage resource cannot be excluded. This potential has not been acknowledged in the EIAR and there has been no assessment of the likely significant effects of the Project on UCH. Section 12.99 of the EIAR states that 'Turbine 11, the closest turbine, is located c. 0.23 km away from the crannog's zone of protection (MA025-004) and as such is not predicted to cause direct effects to the asset. Any unknown remains related to the crannog would also not be anticipated to extend outside the Zone of Protection and within the footprint of the development. Therefore, no direct impacts are predicted upon the asset or potential associated remains. Therefore, no magnitude of effect is predicted, resulting in no significance of effect'. However, previous archaeological investigations of crannóga in Ireland have revealed concentrations of associated archaeological materials at considerable remove from the sites. It is further noted that the proposed development includes interactions with a number of waterways and water-crossings that, given the concentration of known archaeological monuments in their environs, also have the potential to have significant effects on previously unknown UCH.

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. 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 underwater heritage, the protection of which is provided for in legal codes. The National Planning Framework states that 'the protection of archaeological heritage is recognised as a core component to achieving sustainable development' and National Policy Objective 89 is to 'Protect, conserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance. It is further noted that the Mayo County Development Plan includes policies relating to the protection of archaeological, including underwater cultural, heritage.



Accordingly, advance archaeological test excavation and underwater archaeological impact assessment should be carried out in advance of any development 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 or preservation by record (i.e. full archaeological excavation) of such discoveries will be necessary. This can be addressed by the inclusion of an appropriate condition, if the development is permitted.

The following should be included as a condition of any grant of permission from An Coimisiún Pleanála. Note these recommended conditions align with Sample Conditions C2, 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 recommendations, underwater cultural heritage:

5. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 12 (Volume 2) of the EIAR (SLR Consulting) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
6. 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, with a concentration of testing in those areas proximal to the the Recorded Monument MA025-004---- crannog, 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 & 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 & 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.
7. The developer shall commission an Underwater Archaeological Impact Assessment (UAIA) report which shall include the following:
 - d. A desktop assessment that addresses the known and potential underwater cultural heritage of the development area, as identified by fieldwork, cartographic analysis, historical research and prior archaeological investigations. The assessment shall include a full inventory, mapping and survey (photographic, descriptive,



- photogrammetric, as appropriate) of all underwater cultural heritage features and structures that are proposed to be significantly affected by the proposed development.
- e. The UAIA shall include a licenced 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 machinery movements that may affect the underwater environment. The wade/dive assessment and metal detection survey shall be undertaken by a suitably licenced and experienced underwater archaeologist. All identified underwater cultural heritage shall be surveyed (photographic, descriptive, photogrammetric) in detail as part of the assessment. A Dive/Survey licence (Section 3 1987 National Monuments Act) and Detection Device consent (Section 2 1987 National Monuments Act) will be required for the dive/wade survey and metal detection, respectively.
 - f. Having completed the above-described works, a final report describing the results of the UAIA shall be submitted to the Department of Housing, Local Government & Heritage. The report shall include a comprehensive Archaeological Impact Statement (AIS) that comments on the degree to which the extents, location and levels of all proposed works (including Site Investigation works) required for the development, will impact upon any underwater cultural heritage and areas of underwater archaeological potential that have been identified. The AIS shall describe the potential impact(s) of all proposed development works and shall also assess any proposed additional potential secondary/indirect impacts, such as those caused by scouring resulting from changes in hydrology. Mitigation shall prioritise redesign to allow for full or partial preservation in situ and the institution of archaeological exclusion zones, and may also include further wade/dive surveys, test-excavations, excavations ('preservation by record') and/or monitoring, as deemed appropriate. The Department of Housing, Local Government & Heritage will advise with regard to these matters. No construction works shall commence until after the UAIA has been approved in writing to the developer by the Department of Housing, Local Government & Heritage.

Nature Conservation

The Department has reviewed the Natura Impact Statement (NIS) and the supporting ecological documentation submitted with the application. The documentation is supported by an extensive programme of ecological surveys and environmental assessments and provides a substantial body of information on the receiving environment. Further clarification is required in a number of areas before the competent authority can determine, that the proposed development will not adversely affect the integrity of Natura 2000 sites.

- The proposed mitigation strategy places considerable reliance on peatland restoration and habitat enhancement measures. The documentation notes that circa 2/3 of bog restoration effort will fail and that success to target condition is in excess of 30 years. The Department therefore recommends that additional information be provided on the evidence supporting the anticipated restoration success, timescales, and the contingency measures if targets are not met.



- Given the importance of maintaining the hydrological integrity of peatland habitats, further information should also be provided on the potential for indirect drying effects beyond the development footprint. In particular, the documentation should demonstrate how existing hydrological processes will be maintained throughout both the construction and operational phases and explain how uncertainty in the hydrological assessment has been addressed.
- The Habitat Management Plan would benefit from greater detail regarding the implementation and evaluation of the proposed restoration measures.
- The in-combination assessment should also be expanded to provide greater transparency regarding the developments considered, the methodology used to assess cumulative hydrological effects and cumulative impacts on qualifying bird species, and the basis upon which these cumulative effects have been discounted.
- Finally, the NIS should more clearly demonstrate how its conclusions have been determined against the site-specific conservation objectives for each European site. In particular, the assessment should explicitly describe how the predicted residual effects, following implementation of mitigation measures, have been evaluated against the conservation objectives of the relevant SACs and SPAs.

The Department recommends that the above information be sought to assist the competent authority in completing the Appropriate Assessment.

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