Our Case Number: ACP-324610-26

An Coimisiún Pleanála

Department of Housing, Local Government and Heritage
The Manager
Development Applications Unit
Government Offices
Newtown Road
Co. Wexford
Y35 AP90

Date: 23 October 2026

Re: Hodson Bay Waterfront Park Project
Hodson Bay, Townland of Barrymore, Co. Roscommon

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 or approved it with conditions.

If you have any queries in relation to the matter please do not hesitate to 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,

Kevin McGettigan

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

JA03

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Thursday 15 October 2026 10:44
To: LAPS <laps@pleanala.ie>
Subject: Your Ref: ACP-324610-26 DAU Ref: S177AE Hodson Bay Waterfront Park and Marina

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 underwater archaeological and the nature conservation observations/recommendations of the Department in relation to the aforementioned S177(AE).

Can you please confirm receipt of same?

Kind Regards,
Sinéad

—
Sinéad O' Brien
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 Oidhreachta
Department of Housing,
Local Government and Heritage

Your Ref: ACP-324610-26
DAU Ref: S177AE Hodson Bay Waterfront Park and Marina
(Please quote in all related correspondence)

15 October 2026

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

Via email to to laps@pleanala.ie

Re: Notification under Section 177(AE) of the Planning and Development Act 2000 (as amended)

Re: The development of a Waterfront Park and Marina Development at Hodson Bay, in the townland of Barrymore, County Roscommon

A Chara

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated heading(s).

Underwater Archaeology

The Department has reviewed the planning application and Environmental Impact Assessment Report (EIAR) submissions for the proposed Hodson Bay Waterfront Park and Marina Redevelopment.

Lough Ree boasts a rich and varied cultural heritage that has been extensively documented in *Lough Ree: Historic Lakeland Settlement* (B. Cunningham and H. Murtagh (eds)., 2015). Its Underwater Cultural Heritage, including submerged wrecks, logboats and archaeological objects, forms a key part of its cultural heritage that requires careful consideration within the EIAR. Lough Ree contains a rich and diverse cultural heritage that includes:

- Archaeological Monuments, within/in the environs of the proposed development area, recorded in the Record of Monuments and Places (RMP)/Sites and Monuments Record (SMR) RO049-005002- : Causeway, RO049-005001- : Redundant record, RO049-006---- : Redundant record, RO049-010---- : Enclosure - large enclosure. Their locations are recorded on the National Monuments Service (NMS) Historic Environment Viewer.

- Historic Shipwrecks recorded in the Wreck Inventory of Ireland Database (WIID). The WIID contains records of wrecking events within Lough Ree. The positions of two wrecks have been located and can be seen on the NMS Wreck Viewer[1]:

  In addition, a series of logboats have been discovered in the lake.

- Archaeological objects recorded in the National Museum of Ireland Topographical Files.

- Underwater Cultural Heritage assets, including lacustrine built heritage structures and features (e.g. wharfs, piers, boat houses,), fishing heritage structures and features, archaeological discoveries made from prior marine geophysical surveys, excavations and other investigations, and potential submerged palaeolandscapes.

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 emphasises the non-renewable nature of the archaeological heritage and the need to always consider preservation *in-situ* as the first option. To inform archaeological mitigation strategies that ensure preservation *in-situ* are prioritised, appropriate levels and forms of archaeological assessment are required in advance of development. Advance, early-design stage, pre consent/planning application, archaeological assessment and pre planning submission and pre construction stage mitigation is key to diminishing effects on archaeological heritage.

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 marine 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.

[1] https://www.archaeology.ie/advice-and-support/locate-a-monument-or-wreck/wreck-viewer/

The *National Planning Framework*[2] 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.

and the *National Marine Planning Framework*[3] includes the statement that:

'Proposals unable to contribute to the protection of the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference, avoid, minimise, or mitigate harm to the significance of heritage assets. If it is not possible, to avoid, minimise or mitigate harm, then the public benefits for proceeding with the proposal must outweigh the harm to the significance of the heritage assets. Proposals should consider the potential impact of their application on heritage assets from the earliest stages of project development, taking into account the potential risk of damage to, or degradation of, assets. Expert advice will be required at all stages to inform the development of the proposals. Such proposals may include plans to avoid locations where heritage assets may be located, or to minimise compromise or harm through the use of less invasive construction techniques. Proposals should consider evidence for the level of significance of a heritage asset, including information and advice from relevant regulators and advisors, and on how they are managed. This applies to both identified heritage assets and the potential for such assets to be discovered during development or activity' (National Marine Planning Framework, 89).

Obligations regarding the protection of archaeological heritage are further strengthened under Part 9, Section 171 (1) of the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023, which requires Public Authorities to have regard to historic heritage in the performance of their respective functions.

It is further noted that the Roscommon County Development Plan 2022-2028 includes policies relating to the protection of archaeological heritage (Section 9.7).

Archaeological Recommendations

Archaeological Assessment Mitigation

All recommendations and mitigation measures as set out in the Cultural Heritage chapter of the EIAR shall be implemented in full, except as may otherwise be required in order to comply with the Conditions of this Order.

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[2] https://cdn.npf.ie/wp-content/uploads/National-Planning-Framework-First-Revision-April-2025-1.pdf
[3] https://assets.gov.ie/139100/f0984c45-5d63-4378-ab65-d7e8c3c34016.pdf

Project Archaeologist

A Project Archaeologist shall be appointed to oversee and advise on all aspects of the Project, including detailed design, construction activities and the management of all archaeological works.

Construction Environment Management Plan

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. 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 An Coimisiún Pleanála in relation to identifying potential impacts on European and national nature conservation sites, biodiversity and environmental protection in general, in the context of the current proposal.

The Department acknowledges the submission of a Natura Impact Statement (NIS) and Environmental Impact Assessment Report (EIAR) with the application. The NIS has identified the proposed development as being located within the boundaries of the Lough Ree Special Area of Conservation (SAC) (Site Code: 000440) and Lough Ree Special Protection Area (SPA) (Site Code: 004064) at Hodson Bay. The potential for direct and indirect *in-situ* impacts on the integrity of these sites therefore exists. Works are noted to include the driving of 42 steel piles into the lakebed for the attachment of a floating breakwater, floating jetties and gangways connected to the shoreline.

The primary habitat designation for the Lough Ree SAC – '*Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation*' [3150] is associated with base-rich lakes, typified by low-lying, large, naturally productive catchments with a high abundance and diversity of pondweeds (*Potamogeton spp.*) and mesotrophic values for total phosphorus and chlorophyll. The Department notes that aquatic surveys *in-situ* indicated a degradation of this habitat within the confines of the proposed piling, with high levels of siltation and algal coverage (*Cladophora sp.*) indicating preexisting habitat deterioration from current recreational usage of the bay.

In the first instance, the Department recommends that all mitigations as outlined in the aforementioned environmental reports and the CEMP should be strictly adhered to, with qualified Ecological Clerk of Works (ECoW) supervision as appropriate. Damage should be prevented through appropriate exclusion measures to all adjacent fragments of the identified Annex I habitat '*Alluvial Forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)*' [91E0].

The Department also notes the proposed closure of an identified Soprano Pipistrelle roost in the existing water sports building. As a species listed under Annex IV of the Habitats Directive (Council Directive 92/43/EEC), all bat species in Ireland receive strict protection under the European Communities (Birds and Natural Habitats) Regulations, S.I. No. 477/2011. Roscommon County Council will therefore be required to submit an application to the National Parks and Wildlife Service (NPWS) under Regulation 54 to apply for a Derogation Licence for the closure of the roost. This process should take place in advance of any formal planning consent from An Coimisiún Pleanála for said works. Guidance is provided in the NPWS document 'Bat mitigations for Ireland V2' (2022)[4]

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

Joanne Lyons
Higher Executive Officer
Development Applications Unit
Administration

[4] https://www.npws.ie/sites/default/files/publications/pdf/IWM134.pdf