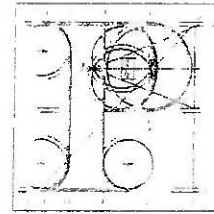


Our Case Number: PA0033



An
Bord
Pleanála

Development Applications Unit
Government Offices
Newtown Road
Wexford
Co. Wexford
Y35 AP90

Date: 10 February 2025

Re: Galway Harbour Extension
Renmore and Townparks Townlands, Galway

Dear Sir / Madam,

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

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

PA09

Tel
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Lauren Griffin

From: Lauren Griffin
Sent: Friday 7 February 2025 16:40
To: Housing Manager DAU
Subject: RE: Your Ref: PA0033 Our Ref: SID-2014-GE-02/2019 Re: Extension to Galway Harbour

A Chara,

The Board acknowledges receipt of your email, official acknowledgement will issue in due course.

Kind regards,

Lauren

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Friday 7 February 2025 15:40
To: LAPS <laps@pleanala.ie>
Subject: Your Ref: PA0033 Our Ref: SID-2014-GE-02/2019 Re: Extension to Galway Harbour

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,

Further to the Department's nature conservation observations/recommendations that issued to you yesterday please find outlined below the archaeological observations/recommendations of the Department in relation to this SID application for an extension to Galway Harbour.

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
—



Your Ref: PA0033
Our Ref: **SID-2014-GE-02/2019**
(Please quote in all related correspondence)

7 February 2025

The Secretary
An Bord 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): Proposed SID for Extension to Galway Harbour at Renmore and Townparks Townland, Galway

A Chara

I refer to correspondence received in connection with the above.

Further to the Department's nature conservation observations/recommendations that issued to you yesterday please find outlined below the archaeological observations/recommendations of the Department.

The submissions to An Bord Pleanála, including the *Galway Harbour Extension Response to An Bord Pleanála Sept. 2024 EIS Addendum Chapter 13.2 Archaeology* have been reviewed by the Department. It is noted that the chapter states that 'Having reviewed Chapter 13.2 of the EIS and taking into consideration more recent available information, it is determined that the only change to the archaeological impacts described in Section 13.2.7 of the EIS relates to the lowering of the carriageway under the railway bridge at Lough Atalia Road. As these works have been completed as part of a separate scheme in the intervening period, the impact of these works is no longer relevant to the EIS. While other changes in legislation, guidance documents and base line data were noted, it was determined that these do not affect the impacts outlined in the EIS' (EIS Addendum 13.2.3). It is further noted that a review of the mitigation measures in the EIS states that 'Following a thorough review of the original EIS and in light of more recently available data, mitigation measures in relation to the lowering of Lough Atalia Road have been removed as these works were completed in 2015. An additional Pre-Construction Stage mitigation measure in relation to wreck site W17455 has been added (Section 13.2.4.1 below)' (EIS Addendum 13.2.4). The additional Pre-construction stage mitigation measure is described as follows: 'A target [sic.] test excavation shall be carried out on the wreck W17455 to



establish the precise nature and context of the material. Should coherent remains of a historic vessel be uncovered during the archaeological testing, further mitigation measures may be necessary including full excavation of the wreck' (EIS Addendum 13.2.4.1). In its assessment of the validity of earlier conclusions or any necessary amendments to same, the addendum states that 'There are no changes to the conclusions due to the passage of time and the extensive mitigation measures remain as proposed and now also include for the wreck site as described in Section 13.2.4.1' (EIS Addendum 13.2.7). In light of this conclusion, the following requirements of the Department integrate with our prior submission to the Board dated 27 August 2019 (Department Reference: ABPW-ABPW-A190703-0029) and are provided to assist An Bord Pleanála (and the project proponents) to align the project with statutory obligations and policy objectives for the protection of the State's underwater cultural heritage.

Recommendations

The Department recommends that the following conditions be attached to any approval of the proposed development.

1. All recommendations and mitigation measures in relation to underwater and terrestrial archaeology as set out in Chapter 13.2 Archaeology *Galway Harbour Extension* (Tobin Consulting Engineers 2014) and Chapter 13.2 Archaeology *Environmental Impact Statement Galway Harbour Extension Response to An Bord Pleanála EIS Addendum* (Tobin Engineers Sept. 2024) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order. Compliance with this condition shall require a formal statement in writing from the National Monuments Service of this Department to An Bord Pleanála that all mitigation measures have been implemented and approved.
2. A Project Archaeologist shall be appointed to oversee and advise on all archaeological aspects of the Project, including detailed design, construction activities and maintenance.
3. All shipwrecks/vessels protected by the National Monuments Acts 1930-2014, regardless of whether they have been located or not, and geophysical survey anomalies of archaeological potential, shall be protected by the implementation of Archaeological Exclusion Zones (AEZs). A detailed inventory of all AEZs, including associated imagery from geophysical surveys/archaeological diver surveys, shall be forwarded to the Department for review. Compliance with this condition shall require a formal approval statement in writing from the National Monuments Service of this Department to An Bord Pleanála.
4. An Underwater Archaeological Impact Assessment (UAIA) Report shall be forwarded by the Developer to the Department for review and approval prior to all further geotechnical investigation works taking place. The UAIA shall augment previous archaeological assessments and shall include the following:



- a. Results of geophysical survey data sets assessment and archaeological interpretation by a suitably qualified and experienced maritime archaeologist, to ensure that any proposed geotechnical works do not negatively impact on locations where there is known or potential underwater cultural heritage.
 - b. Any additional geophysical surveys shall be licensed under the National Monuments Acts 1930-2014. A Dive Survey Licence (Section 3 1987 National Monuments Act) and Detection Device consent (Section 2 1987 National Monuments Act) shall be required. Any dive surveys required in connection with proposed geophysical surveys or other works shall also be licensed (Section 3 1987 National Monuments Act). Any dive survey shall be accompanied by a handheld metal detection survey which shall also be licensed (Section 2 1987 National Monuments Act). All archaeological diving shall comply with the Health and Safety Authority's Safety, Health and Welfare at Work (Diving) Regulations 2018/2019.
 - c. Once all geophysical surveys and archaeological interpretations have been completed, the full information shall be compiled into a final UAIA report and submitted to the Department for review and approval, prior to undertaking any geotechnical works. The UAIA Report shall contain a detailed Archaeological Impact Statement that addresses all identified or potential impacts on underwater cultural heritage and also makes 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 recommended by the Department) all potential/identified significant 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 geotechnical works shall be undertaken until approval in writing from the Department has been received by the Developer. Compliance with this condition requires a formal statement in writing, from the National Monuments Service of this Department to An Bord Pleanála, approving the UAIA report.
5. Following the completion of all geotechnical works, the Developer shall furnish the Project Archaeologist with the results of all site investigation works and shall provide access to site investigation cores and physical samples for archaeological and geoarchaeological review by a qualified geoarchaeologist. Where potential submerged palaeolandscape deposits or other anthropogenic materials are identified, they shall be subject to geoarchaeological and palaeoenvironmental



analysis and scientific dating, in agreement with the Department and subject to approval of Licences to Alter and Export from the National Museum of Ireland. Following the completion of all geotechnical and archaeological works and any necessary post-excavation specialist analysis, the Department shall be furnished with a final archaeological report describing the results of the works. Compliance with this condition requires a formal statement in writing, from the National Monuments Service of this Department to An Bord Pleanála, approving the geoarchaeological report.

6. The Final Design for the proposed development shall be the subject of an Underwater Archaeological Impact Assessment (UAIA), to be submitted to the Department for review and approval, prior to the commencement of any seabed preparation or construction works. The UAIA Report shall contain the results of additional archaeological investigations at the protected wreck site identified in the Wreck Database of Ireland Database Reference W17455 and in the proposed dredge dump area at the lagoons, as well as a synthesis of the archaeological outcomes of all prior geophysical, geotechnical, intertidal, dive survey archaeological investigations and any other relevant investigations. The UAIA Report shall contain a detailed Archaeological Impact Statement that addresses all identified or potential impacts on 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 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 seabed preparation or construction works shall be undertaken until formal approval in writing from the Department has been received by the Developer. Compliance with this condition requires a formal statement in writing, from the National Monuments Service of this Department to An Bord Pleanála, approving the UAIA report.
7. Archaeological monitoring shall be undertaken as follows:
 - a) The services of a suitably qualified and experienced, to the satisfaction of the National Monuments Service of this Department, maritime archaeologist shall be engaged to carry out full-time on-board archaeological monitoring of all construction activities that impact on the intertidal/foreshore, seabed and/or on underwater cultural heritage and any works where material of archaeological importance may be uncovered.
 - b) The archaeological monitoring shall be carried out by a suitably qualified and experienced, to the satisfaction of the National Monuments Service of this



Department, maritime archaeologist, under a Section 26 (National Monuments Act 1930) excavation licence 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 dredge 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. The Finds Retrieval Strategy shall address the likely post-excavation requirements for finds from an underwater environment, including recording, finds processing, analysis and long-term conservation of material recovered during the project. Post-excavation analysis shall form part of the ongoing archaeological works on site, informed by a post-excavation strategy included in the methodology as submitted by the licence-eligible archaeologist. 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.
- d) Sufficient, suitably experienced and qualified, to the satisfaction of the National Monuments Service of this Department, maritime archaeologists shall be in place to ensure continuous archaeological monitoring works, including 24-hour on-board archaeological monitoring of construction activities. 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 licensed (Section 3 1987 National Monuments Act) and shall include handheld metal detection survey, which shall also be licensed (Section 2 1987 National Monuments Act). All archaeological diving shall comply with the Health and Safety Authority's Safety, Health and Welfare at Work (Diving) Regulations 2018/2019.
- e) In order to ensure that 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 on-board direct archaeological monitoring of all construction activities that impact on the seabed/intertidal zone and/or on underwater cultural heritage, and provides the former with adequate notice (minimum eight weeks) of all forthcoming works that require their attendance.



- f) Should suspected/verified underwater cultural heritage materials, including wrecks, palaeolandscape materials, archaeological features or sites and/or archaeological objects 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) 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 by the institution of permanent Archaeological Exclusion Zones. Mitigation may also include underwater archaeological inspection by means of archaeological diving, underwater archaeological surveys (geophysical, ROV), underwater archaeological test-excavations, underwater archaeological excavations ('preservation by record'), stabilisation works and/or archaeological monitoring, 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 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 and conservation of archaeological objects, as required by the Department and by the National Museum of Ireland, with all resulting and associated archaeological costs to be borne by the Developer. Compliance with this condition requires a formal statement in writing, from the National Monuments Service of this Department to the Marine Area Regulatory Authority/An Bord Pleanála, approving the final report submission.
8. The Developer shall put in place from the outset a monitoring strategy to address any hydrological increases and/or vibrational increases that might occur during the course of the works. The advice of the contracted underwater archaeologist shall



be taken, particularly with regard to all recorded monuments and protected structures within the footprint of any proposed works. Potential effects of increased immediate and long-term hydrological volumes shall be addressed and mitigated for. A metering system shall be put in place to enable on-going monitoring of vibrations on all cultural heritage (recorded monuments, protected structures and known wreck sites) and mechanisms for mitigating negative vibrations to such structures and sites.

9. The Construction Environmental 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 EIS and subsequent submissions. 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.
10. In default of agreement on any requirements of the Department, the matter shall be referred to An Bord Pleanála for determination.

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