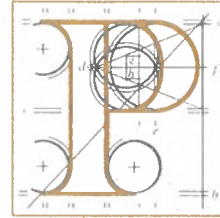


**Our Case Number:** ABP-320946-24

**Your Reference:** Galway County Council



An  
Coimisiún  
Pleanála

MKO  
c/o Orla McCafferty  
Tuam Road  
Galway  
H91 VW84



**Date:** 17 September 2025

**Re:** Development at Long Point, Lake Road (R351)  
Knockanima, Loughrea, County Galway

Dear Sir / Madam,

Enclosed, for **Information Only** are two copies of two Further Information Submissions received by the Commission from the following in relation to the above-mentioned proposed development:

1. DAU
2. Inland Fisheries Ireland

Please ensure that a copy of these submissions is available for public inspection at the offices of the local authority.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission at [laps@pleanala.ie](mailto: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

Teil (01) 858 8100  
Glao Áitiúil LoCall 1800 275 175  
Facs Fax (01) 872 2684  
Láithreán Gréasáin Website www.pleanala.ie  
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64 Sráid Maoilbhríde 64 Marlborough Street  
Baile Átha Cliath 1 Dublin 1  
D01 V902 D01 V902



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**Glaó Áitiúil**  
**Facs**  
**Láithreán Gréasáin**  
**Ríomhphost**

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64 Marlborough Street  
Dublin 1  
D01 V902

**Our Case Number:** ABP-320946-24



An  
Coimisiún  
Pleanála

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

**Date:** 17 September 2025

**Re:** Development at Long Point, Lake Road (R351)  
Knockanima, Loughrea, County Galway

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent letter in relation to the above mentioned proposed development. The contents of your letter have been noted.

If you have any queries in relation to this matter please contact the undersigned officer of the Commission at [laps@pleanala.ie](mailto: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

HA06

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Dublin 1  
D01 V902

## Lauren Griffin

---

**From:** Lauren Griffin  
**Sent:** Tuesday, 16 September 2025 11:51  
**To:** Simon Dolan (Housing)  
**Subject:** RE: S177AE Application - Public realm enhancement works at Long Point, Loughrea, Co. Galway

A Chara,

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

Kind regards,

Lauren

---

**From:** Simon Dolan (Housing) <[Simon.Dolan@npws.gov.ie](mailto:Simon.Dolan@npws.gov.ie)>  
**Sent:** Friday, September 12, 2025 2:21 PM  
**To:** LAPS <[laps@pleanala.ie](mailto:laps@pleanala.ie)>  
**Subject:** S177AE Application - Public realm enhancement works at Long Point, Loughrea, Co. Galway

**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 & Nature Conservation recommendations.

Regards,



Simon Dolan

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreacht  
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

An Roinn Tithíochta,  
Rialtais Áitiúil agus Oidhreachta  
Department of Housing,  
Local Government and Heritage



**Planning Ref:** S177AE Long Point  
(Please quote in all related correspondence)

12 September 2025

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

Via email: [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

**Proposed Development: S177AE application for Public realm enhancement works**

A chara

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

### Archaeology

#### **Underwater Archaeology:**

The consultation documents, including the submitted Underwater Archaeological Impact Assessment report (Mizen Archaeology June 2025) have been reviewed by the Department. It is noted that the proposed development site is located in proximity to Recorded Monument GA105-236---- (Deer park), which is subject to statutory protection in the Record of Monuments and Places (RMP) established under Section 12 of the National Monuments (Amendment) Act 1994. It is noted that the proposed development also includes lacustrine construction activities that may lead to significant effects on Lough Rea's underwater cultural heritage protected by Section 3 of the National Monuments (Amendment) Act 1987. The Underwater Archaeological Impact Assessment (UAIA) (Section 7) concludes that:

*'Given the significance of the crannogs, historical accounts of fluctuating water levels, and evidence for earlier shorelines, the area is assessed as having high archaeological potential. Furthermore, the survey confirmed that the lakebed sediments offer ideal anaerobic conditions conducive to the preservation of archaeological material. Disturbance to the lakebed will be minimal and limited to localised works associated with the repair of the existing pier and slipway, the*

**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





*construction of a circular viewing deck to the south of the existing pier, and modifications to the existing beach area, including the installation of a deck, steps, and a ramp providing access to the water's edge. However, such disturbance has the potential to negatively directly impact on previously unrecorded buried archaeological remains. The viewing platform will have a positive overall operational impact as it will enhance the ability for members of the public to view the archaeological sites within the lake'.*

In light of the potential for significant effects on underwater cultural heritage, as outlined above, the Department recommends that the following Condition is attached, should planning be approved by the local authority.

#### **Archaeology**

1. All recommendations and mitigation measures as set out in the submitted Underwater Archaeological Impact Assessment report (Mizen Archaeology, June 2025) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.

#### **Archaeological Monitoring (Terrestrial)**

2. Archaeological monitoring of terrestrial works shall be undertaken as follows:
  - a. The services of a suitably qualified and experienced, to the satisfaction of the Department of Housing Local Government & Heritage, archaeologist shall be engaged to carry out full-time archaeological monitoring of all construction activities that involve ground disturbance or demolition of historic fabric, structures or features, and of any works where materials 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 Department of Housing Local Government & Heritage, 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 of Housing Local Government & Heritage, as part of the archaeological licence application. This shall include for systematic finds retrieval and metal detection of all spoil, which shall 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.
  - d. Sufficient, suitably experienced and qualified to the satisfaction of the Department of Housing Local Government & Heritage archaeologists shall be in place to ensure continuous archaeological monitoring of Project works. An archaeological team shall be on standby to deal with any rescue excavation and may be augmented as required.



- 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 that involve ground disturbances or demolitions and of any works where materials of archaeological importance may be uncovered. Adequate notice (minimum four weeks) of all forthcoming works that require the attendance of the monitoring archaeologist(s) shall be provided by the works contractor.
- f. Should suspected/verified archaeological structures, features, deposits 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 of Housing Local Government & Heritage 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 of Housing Local Government & Heritage. 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 of Housing Local Government & Heritage. No construction activities shall recommence within the Temporary Archaeological Exclusion Zone until formally agreed in writing with the Department of Housing Local Government & Heritage. 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 of Housing Local Government & Heritage. All resulting and associated archaeological costs shall be borne by the Developer.
- h. 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 works and any post-excavation analysis, scientific dating programmes, palaeoenvironmental analysis, geoarchaeological analysis, conservation of archaeological objects, as required by the Department of Housing Local Government & Heritage 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.



### **Archaeological Monitoring (Underwater)**

3. Archaeological monitoring of instream/lake-margin construction works shall be undertaken as follows:

- a. The services of a suitably qualified and experienced, to the satisfaction of the Department of Housing Local Government & Heritage, maritime/underwater archaeologist shall be engaged to carry out full-time archaeological monitoring of all in-stream/lake margin 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 of Housing Local Government & Heritage, maritime/underwater 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 of Housing Local Government & Heritage 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 of Housing Local Government & Heritage, 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 in-stream/lake margin construction activities or works with the potential to impact on underwater cultural heritage. The monitoring archaeologist shall be provided with adequate notice (minimum eight 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 of Housing Local Government & 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 of Housing Local Government & Heritage. 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 of Housing Local Government & Heritage. No construction activities shall recommence within the Temporary Archaeological Exclusion Zone until formally agreed in writing with the Department of Housing Local Government & Heritage. 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 of Housing Local Government & Heritage. All resulting and associated archaeological costs shall be borne by the Developer.
- h. The planning authority and the Department of Housing Local Government & Heritage shall be furnished with a final archaeological report describing the results of all underwater 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 of Housing Local Government & Heritage 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**

- 4. 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 as set out in the Underwater Archaeological Impact Assessment report. 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 you in relation to identifying potential impacts on European sites, other nature conservation sites, and biodiversity and environmental protection in general, in the context of the current proposal.

Lough Rea SAC is one of the most important sites for habitat 3140 in the country and one of the few assessed as in good condition (last monitored in 2018, see IWM 124<sup>1</sup>). The Conservation objective for the Lough Rea SAC [000304] is to maintain the favourable conservation condition of Hard oligo-mesotrophic waters with benthic vegetation of *Chara* spp. The attribute 'Habitat area' should be stable or increasing, subject to natural processes. The area proposed for the construction of an upgraded kayak slip, accessibility slip, a Crannóg viewing platform, and a new boardwalk are located within mapped area of this Qualifying Interest habitat.

The NIS states: "*The lake habitat adjacent to the Proposed Development site, classified as Limestone/marl lake, conforms to Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. as mapped in the Site-Specific Conservation Objectives (SSCOs) of Lough Rea SAC. Species recorded within the habitat are indicative of this Annex I habitat... In the shallower lake areas adjacent to the Proposed Development site where there is higher exposure, Chara species were infrequent to absent, and comprised of larger boulder substrate. Following the field surveys, it was noted that Chara spp. within the footprint of the Proposed Development were sparse and did not represent high quality areas of this QI.*"

The 3140 habitat is characterised by vegetation zones that are related to water depth. Shallow water is typified by sparse charophyte cover and dominant cyanobacterial crust cover, owing to the natural water level fluctuations, wave action and substratum found in this zone. The Department disputes the assertion that sparse charophyte cover does not 'represent high quality areas of this QI'. It could represent the typical vegetation of the specific zone and could even indicate high quality and good condition. To confirm that, it would be necessary to conduct a cyanobacterial crust survey and identify the charophytes to species. (as per IWM 125<sup>2</sup>).

Should consent be granted, the following conditions should be considered:

- Pre-construction cyanobacterial crust survey to determine quality of QI habitat in the proposed infrastructure footprint. Impacts to high quality habitat should be avoided.

<sup>1</sup> <https://www.npws.ie/sites/default/files/publications/pdf/IWM124.pdf>

<sup>2</sup> <https://www.npws.ie/sites/default/files/publications/pdf/IWM125.pdf>



- Pre-construction survey to determine whether there are ground water springs or seepages discharging at proposed infrastructure locations and avoid any potential impacts.
- The Department acknowledges the Habitat enhancement plan. Open fringing habitats (species-rich, dry semi-natural grassland) are generally preferable for habitat 3140, although some areas of woodland or reed bed are good in terms of habitat heterogeneity.
- It is noteworthy that IWM 124 highlights that the important and abundant cyanobacterial crust at Lough Rea is approaching the thresholds between Good and Poor in terms of chlorophyll content, suggesting nutrient (phosphorus) pressures. Therefore, fertilisation of 'amenity grassland' should be minimised/eliminated.

The Department takes this opportunity to remind Galway County Council of their obligations under Article 6 of the Habitats Directive (92/43/EEC). Competent national authorities, are to authorise activity only if they have made certain that it will not adversely affect the integrity of a European site and, consequently, not likely to give rise to deterioration or significant disturbances within the meaning of Article 6(2). Any matters raised above should also be considered in the planning policy context for the proposed development, including the protective natural heritage and biodiversity objectives and policies in the Galway County Development Plan.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie) where used, or to the following address:

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

Is mise, le meas

Simon Dolan  
Development Applications Unit  
Administration

**Our Case Number:** ABP-320946-24



An  
Coimisiún  
Pleanála

Inland Fisheries Ireland  
Teach Breac  
Earl's Island  
Co. Galway

**Date:** 17 September 2025

**Re:** Development at Long Point, Lake Road (R351)  
Knockanima, Loughrea, County Galway

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](mailto: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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**Glaio Áitiúil**  
**Facs**  
**Láithreán Gréasáin**  
**Ríomhphost**

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64 Sráid Maoilbhríde  
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D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902



## Lauren Griffin

---

**From:** Lauren Griffin  
**Sent:** Tuesday, 16 September 2025 11:56  
**To:** David Harrington  
**Subject:** RE: ACP Reference: ABP-320946-24

A Chara,

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

Kind regards,

Lauren

---

**From:** David Harrington <[David.Harrington@fisheriesireland.ie](mailto:David.Harrington@fisheriesireland.ie)>  
**Sent:** Friday, September 12, 2025 4:37 PM  
**To:** Bord <[bord@pleanala.ie](mailto:bord@pleanala.ie)>  
**Subject:** ACP Reference: ABP-320946-24

**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.

Dear Secretary,

I refer to the proposed Section 177AE of the Planning and Development Act 2000, as amended – Notice of Significant Further Information on a Direct Planning Application to An Coimisiún Pleanála (Ref. ABP-320946-24) For the Proposed Development at Long Point, Lake Road (R351) in the townland of Knockanima, Loughrea, Co. Galway.

(An Coimisiún Pleanála - ABP-320946-24)

Please find attached IFI's observations on the planning application.

I would appreciate if An Coimisiún Pleanála could acknowledge receipt of this submission.

Kind Regards,

David

**David Harrington**  
**Senior Fisheries Environmental Officer**

✉ [David.Harrington@fisheriesireland.ie](mailto:David.Harrington@fisheriesireland.ie) • ☎ +353 (0)91 563118 • 🌐 [www.fisheriesireland.ie](http://www.fisheriesireland.ie) • 🏠 H91 E2A2



Iascach Iníre Éireann  
Inland Fisheries Ireland



beolíne / hotline

**0818 34 74 24**

Oscailte 24 uair an lae / 7 lá in aghaidh na seachtaine  
Open 24 hours a day / 7 days a week



Help us protect Ireland's rivers, lakes and coastlines by reporting illegal fishing, water pollution or invasive species.  
Our confidential phone number is 0818 34 74 24, which is open 24 hours a day / 7 days a week.

To read our Privacy Policy and Email Disclaimer Notice, Please visit [www.fisheriesireland.ie](http://www.fisheriesireland.ie)



**Iascach Iníre Éireann  
Inland Fisheries Ireland**

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

ACP Reference: **ABP-320946-24**

12<sup>th</sup> September 2025

**Re: Section 177AE of the Planning and Development Act 2000, as amended – Notice of Significant Further Information on a Direct Planning Application to An Coimisiún Pleanála (Ref. ABP-320946-24) For the Proposed Development at Long Point, Lake Road (R351) in the townland of Knockanima, Loughrea, Co. Galway.**

Dear Secretary,

Inland Fisheries Ireland (IFI) is the State Body responsible for the protection, management and conservation of the inland fisheries and sea angling resource in Ireland. Protection of the aquatic environment and habitat is a vitally important element of IFI's work. IFI is mandated to ensure that the fisheries of the State are protected. "Fisheries" includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas where in fish deposit their eggs. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish stocks.

The application proposes the development of an existing public amenity area and carpark at Long Point, Lake Road, Loughrea, Co Galway. This site is located adjacent to the Lough Rea Special Area of Conservation (SAC) and Special Protection Area (SPA).

Fishing on Lough Rea is managed by the Loughrea Anglers' Association who also operate a small hatchery which stocks the lake with brown trout at the unfed fry stage. IFI fish surveys of the lake have also detected the presence of perch, rudd, pike, eel, three-spined stickleback and nine-spined stickleback.

Lough Rea is currently listed as of good ecological status and not at risk under the Water Framework Directive, a status that needs to be protected.

Having regard to these environmental sensitivities, IFI requests that consideration be given to the following points:

**Protection of water quality and fisheries habitat**

It is noted that the application includes mitigation measures to avoid impacts on water quality during the construction phase of the project. These measures are set out in the Construction and Environmental Management Plan (CEMP) and have been incorporated into the design of the proposed works. IFI would also request that should the development be granted permission, it be a



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

requirement that the appointed contractor(s) are made aware of IFIs guidance document for reference regarding the protection of fisheries watercourses during construction works in and adjacent to waters before the construction phase of the project commences:  
<https://www.fisheriesireland.ie/sites/default/files/migrated/docman/2016/Guidelines%20Report%202016.pdf>

#### **Invasive Species**

IFI notes that Section 3.1.3 Management of Invasive Species confirms that whilst no third schedule invasive species were noted onsite, should invasives be subsequently identified, an Invasive species Management Plan (ISMP) will be produced by a suitably qualified ecology to manage any such species. IFI would request that it receive advanced notification should invasives be detected prior to the management of these species. Landscaping proposals for the development should require the use of native species from local stock. More information can be found at [Home - Invasives.ie](http://Home - Invasives.ie)

#### **Biosecurity**

IFI would request that a biosecurity/information station be incorporated into the proposed redevelopment of the public amenity area to prevent the inadvertent introduction of invasive species such as the zebra mussel which are present in the River Corrib into Lough Rea (see attached IFIs "Invasive Species Disinfection Guidelines for Paddle Sports" for reference).

#### **Response to Further Information - Section 3.1.3 - Further Information Item 2(iii)**

*Detailed materials and method for construction of the proposed slipway including any proposal to achieve increased depth of water adjacent for its operation or otherwise. "Prior to pumping, electrofishing will be carried out within the works area under licence from the NPWS by a qualified ecologist to remove any fish and move them into Lough Rea".*

The above statement is also referenced within the Updated NIS document and the Updated Construction and Environmental Management Plan. IFI wish to clarify that such an electrofishing operation will require a Section 14 Authorisation from the Inland Fisheries Division of the Department of Environment, Climate and Communications.

#### **Response to Further Information - Further Information Item 6**

*It is proposed to raise the existing electrical kiosk to 81.40m O.D. (Flood Risk Assessment design height) as shown and to fully seal the existing foul pump chamber against ingress by floodwaters. Therefore, it is considered that the foul water pumping station can effectively store and pump to the wastewater network negating the possibility of contamination during flood events.*

IFI notes this further information alongside Section 2.2.2.2 which states that the wastewater treatment system will undergo yearly inspections and maintenance to ensure sufficient use, and no faults have occurred. IFI would also request that a warning beacon light be installed as part of the proposed foul pumping station to draw attention to any potential faults which may arise within the system.

#### **Updated Construction and Environmental Management Plan**

Should any issues arise during the construction phase of the project which could potentially impact on the fisheries habitat, angling, salmonid/eel/lamprey migration within the Lough Rea catchment, IFI will require the cessation of works pending a satisfactory resolution to the methodology/issue in question.



**Iascach Iníre Éireann**  
**Inland Fisheries Ireland**

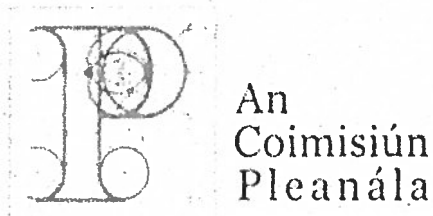
I would appreciate if An Coimisiún Pleanála could acknowledge receipt of this submission.

Yours sincerely

---

David Harrington  
Senior Fisheries Environmental Officer  
IFI Galway  
ACP-LP-0925

**Our Case Number:** ABP-320946-24



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

**Date:** 17 September 2025

**Re:** Development at Long Point, Lake Road (R351)  
Knockanima, Loughrea, County Galway

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent letter in relation to the above mentioned proposed development. The contents of your letter have been noted.

If you have any queries in relation to this matter please contact the undersigned officer of the Commission at [laps@pleanala.ie](mailto: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

HA06

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D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902



## Lauren Griffin

---

**From:** Lauren Griffin  
**Sent:** Tuesday, 16 September 2025 11:51  
**To:** Simon Dolan (Housing)  
**Subject:** RE: S177AE Application - Public realm enhancement works at Long Point, Loughrea, Co. Galway

A Chara,

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

Kind regards,

Lauren

---

**From:** Simon Dolan (Housing) <[Simon.Dolan@npws.gov.ie](mailto:Simon.Dolan@npws.gov.ie)>  
**Sent:** Friday, September 12, 2025 2:21 PM  
**To:** LAPS <[laps@pleanala.ie](mailto:laps@pleanala.ie)>  
**Subject:** S177AE Application - Public realm enhancement works at Long Point, Loughrea, Co. Galway

**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 & Nature Conservation recommendations.

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

An Roinn Tithíochta,  
Rialtais Áitiúil agus Oidhreachta  
Department of Housing,  
Local Government and Heritage



**Planning Ref: S177AE Long Point**  
*(Please quote in all related correspondence)*

12 September 2025

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

Via email: [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

**Proposed Development: S177AE application for Public realm enhancement works**

A chara

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

### **Archaeology**

#### **Underwater Archaeology:**

The consultation documents, including the submitted Underwater Archaeological Impact Assessment report (Mizen Archaeology June 2025) have been reviewed by the Department. It is noted that the proposed development site is located in proximity to Recorded Monument GA105-236---- (Deer park), which is subject to statutory protection in the Record of Monuments and Places (RMP) established under Section 12 of the National Monuments (Amendment) Act 1994. It is noted that the proposed development also includes lacustrine construction activities that may lead to significant effects on Lough Rea's underwater cultural heritage protected by Section 3 of the National Monuments (Amendment) Act 1987. The Underwater Archaeological Impact Assessment (UAIA) (Section 7) concludes that:

*'Given the significance of the crannogs, historical accounts of fluctuating water levels, and evidence for earlier shorelines, the area is assessed as having high archaeological potential. Furthermore, the survey confirmed that the lakebed sediments offer ideal anaerobic conditions conducive to the preservation of archaeological material. Disturbance to the lakebed will be minimal and limited to localised works associated with the repair of the existing pier and slipway, the*

**Aonad na nIarratas ar Fhorbairt**

*Development Applications Unit*

**Oifigi an Rialtais**

*Government Offices*

**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90**

*Newtown Road, Wexford, County Wexford, Y35 AP90*



*construction of a circular viewing deck to the south of the existing pier, and modifications to the existing beach area, including the installation of a deck, steps, and a ramp providing access to the water's edge. However, such disturbance has the potential to negatively directly impact on previously unrecorded buried archaeological remains. The viewing platform will have a positive overall operational impact as it will enhance the ability for members of the public to view the archaeological sites within the lake'.*

In light of the potential for significant effects on underwater cultural heritage, as outlined above, the Department recommends that the following Condition is attached, should planning be approved by the local authority.

#### **Archaeology**

1. All recommendations and mitigation measures as set out in the submitted Underwater Archaeological Impact Assessment report (Mizen Archaeology, June 2025) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.

#### **Archaeological Monitoring (Terrestrial)**

2. Archaeological monitoring of terrestrial works shall be undertaken as follows:
  - a. The services of a suitably qualified and experienced, to the satisfaction of the Department of Housing Local Government & Heritage, archaeologist shall be engaged to carry out full-time archaeological monitoring of all construction activities that involve ground disturbance or demolition of historic fabric, structures or features, and of any works where materials 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 Department of Housing Local Government & Heritage, 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 of Housing Local Government & Heritage, as part of the archaeological licence application. This shall include for systematic finds retrieval and metal detection of all spoil, which shall 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.
  - d. Sufficient, suitably experienced and qualified to the satisfaction of the Department of Housing Local Government & Heritage archaeologists shall be in place to ensure continuous archaeological monitoring of Project works. An archaeological team shall be on standby to deal with any rescue excavation and may be augmented as required.



- 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 that involve ground disturbances or demolitions and of any works where materials of archaeological importance may be uncovered. Adequate notice (minimum four weeks) of all forthcoming works that require the attendance of the monitoring archaeologist(s) shall be provided by the works contractor.
- f. Should suspected/verified archaeological structures, features, deposits 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 of Housing Local Government & Heritage 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 of Housing Local Government & Heritage. 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 of Housing Local Government & Heritage. No construction activities shall recommence within the Temporary Archaeological Exclusion Zone until formally agreed in writing with the Department of Housing Local Government & Heritage. 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 of Housing Local Government & Heritage. All resulting and associated archaeological costs shall be borne by the Developer.
- h. 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 works and any post-excavation analysis, scientific dating programmes, palaeoenvironmental analysis, geoarchaeological analysis, conservation of archaeological objects, as required by the Department of Housing Local Government & Heritage 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.



### **Archaeological Monitoring (Underwater)**

3. Archaeological monitoring of instream/lake-margin construction works shall be undertaken as follows:

- a. The services of a suitably qualified and experienced, to the satisfaction of the Department of Housing Local Government & Heritage, maritime/underwater archaeologist shall be engaged to carry out full-time archaeological monitoring of all in-stream/lake margin 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 of Housing Local Government & Heritage, maritime/underwater 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 of Housing Local Government & Heritage 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 of Housing Local Government & Heritage, 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 in-stream/lake margin construction activities or works with the potential to impact on underwater cultural heritage. The monitoring archaeologist shall be provided with adequate notice (minimum eight 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 of Housing Local Government & 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 of Housing Local Government & Heritage. 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 of Housing Local Government & Heritage. No construction activities shall recommence within the Temporary Archaeological Exclusion Zone until formally agreed in writing with the Department of Housing Local Government & Heritage. 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 of Housing Local Government & Heritage. All resulting and associated archaeological costs shall be borne by the Developer.
- h. The planning authority and the Department of Housing Local Government & Heritage shall be furnished with a final archaeological report describing the results of all underwater 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 of Housing Local Government & Heritage 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**

- 4. 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 as set out in the Underwater Archaeological Impact Assessment report. 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 you in relation to identifying potential impacts on European sites, other nature conservation sites, and biodiversity and environmental protection in general, in the context of the current proposal.

Lough Rea SAC is one of the most important sites for habitat 3140 in the country and one of the few assessed as in good condition (last monitored in 2018, see IWM 124<sup>1</sup>). The Conservation objective for the Lough Rea SAC [000304] is to maintain the favourable conservation condition of Hard oligo-mesotrophic waters with benthic vegetation of *Chara* spp. The attribute 'Habitat area' should be stable or increasing, subject to natural processes. The area proposed for the construction of an upgraded kayak slip, accessibility slip, a Crannóg viewing platform, and a new boardwalk are located within mapped area of this Qualifying Interest habitat.

The NIS states: "*The lake habitat adjacent to the Proposed Development site, classified as Limestone/marl lake, conforms to Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. as mapped in the Site-Specific Conservation Objectives (SSCOs) of Lough Rea SAC. Species recorded within the habitat are indicative of this Annex I habitat... In the shallower lake areas adjacent to the Proposed Development site where there is higher exposure, Chara species were infrequent to absent, and comprised of larger boulder substrate. Following the field surveys, it was noted that Chara spp. within the footprint of the Proposed Development were sparse and did not represent high quality areas of this QI.*"

The 3140 habitat is characterised by vegetation zones that are related to water depth. Shallow water is typified by sparse charophyte cover and dominant cyanobacterial crust cover, owing to the natural water level fluctuations, wave action and substratum found in this zone. The Department disputes the assertion that sparse charophyte cover does not 'represent high quality areas of this QI'. It could represent the typical vegetation of the specific zone and could even indicate high quality and good condition. To confirm that, it would be necessary to conduct a cyanobacterial crust survey and identify the charophytes to species. (as per IWM 125<sup>2</sup>).

Should consent be granted, the following conditions should be considered:

- Pre-construction cyanobacterial crust survey to determine quality of QI habitat in the proposed infrastructure footprint. Impacts to high quality habitat should be avoided.

<sup>1</sup> <https://www.npws.ie/sites/default/files/publications/pdf/IWM124.pdf>

<sup>2</sup> <https://www.npws.ie/sites/default/files/publications/pdf/IWM125.pdf>



- Pre-construction survey to determine whether there are ground water springs or seepages discharging at proposed infrastructure locations and avoid any potential impacts.
- The Department acknowledges the Habitat enhancement plan. Open fringing habitats (species-rich, dry semi-natural grassland) are generally preferable for habitat 3140, although some areas of woodland or reed bed are good in terms of habitat heterogeneity.
- It is noteworthy that IWM 124 highlights that the important and abundant cyanobacterial crust at Lough Rea is approaching the thresholds between Good and Poor in terms of chlorophyll content, suggesting nutrient (phosphorus) pressures. Therefore, fertilisation of 'amenity grassland' should be minimised/eliminated.

The Department takes this opportunity to remind Galway County Council of their obligations under Article 6 of the Habitats Directive (92/43/EEC). Competent national authorities, are to authorise activity only if they have made certain that it will not adversely affect the integrity of a European site and, consequently, not likely to give rise to deterioration or significant disturbances within the meaning of Article 6(2). Any matters raised above should also be considered in the planning policy context for the proposed development, including the protective natural heritage and biodiversity objectives and policies in the Galway County Development Plan.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie) where used, or to the following address:

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

Is mise, le meas

Simon Dolan  
Development Applications Unit  
Administration

**Our Case Number:** ABP-320946-24



An  
Coimisiún  
Pleanála

Inland Fisheries Ireland  
Teach Breac  
Earl's Island  
Co. Galway

**Date:** 17 September 2025

**Re:** Development at Long Point, Lake Road (R351)  
Knockanima, Loughrea, County Galway

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](mailto: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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## Lauren Griffin

---

**From:** Lauren Griffin  
**Sent:** Tuesday, 16 September 2025 11:56  
**To:** David Harrington  
**Subject:** RE: ACP Reference: ABP-320946-24

A Chara,

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

Kind regards,

Lauren

---

**From:** David Harrington <[David.Harrington@fisheriesireland.ie](mailto:David.Harrington@fisheriesireland.ie)>  
**Sent:** Friday, September 12, 2025 4:37 PM  
**To:** Bord <[bord@pleanala.ie](mailto:bord@pleanala.ie)>  
**Subject:** ACP Reference: ABP-320946-24

**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.

Dear Secretary,

I refer to the proposed Section 177AE of the Planning and Development Act 2000, as amended – Notice of Significant Further Information on a Direct Planning Application to An Coimisiún Pleanála (Ref. ABP-320946-24) For the Proposed Development at Long Point, Lake Road (R351) in the townland of Knockanima, Loughrea, Co. Galway.

(An Coimisiún Pleanála - ABP-320946-24)

Please find attached IFI's observations on the planning application.

I would appreciate if An Coimisiún Pleanála could acknowledge receipt of this submission.

Kind Regards,

David

**David Harrington**  
**Senior Fisheries Environmental Officer**

✉ [David.Harrington@fisheriesireland.ie](mailto:David.Harrington@fisheriesireland.ie) • ☎ +353 (0)91 563118 • 🌐 [www.fisheriesireland.ie](http://www.fisheriesireland.ie) • 🏠 H91 E2A2



Iascach Intíre Éireann  
Inland Fisheries Ireland



beolíne / hotline

**081834 74 24**

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Our confidential phone number is 0818 34 74 24, which is open 24 hours a day / 7 days a week.

To read our Privacy Policy and Email Disclaimer Notice, Please visit [www.fisheriesireland.ie](http://www.fisheriesireland.ie)



**Iascach Iníre Éireann  
Inland Fisheries Ireland**

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

ACP Reference: **ABP-320946-24**

12<sup>th</sup> September 2025

**Re: Section 177AE of the Planning and Development Act 2000, as amended – Notice of Significant Further Information on a Direct Planning Application to An Coimisiún Pleanála (Ref. ABP-320946-24) For the Proposed Development at Long Point, Lake Road (R351) in the townland of Knockanima, Loughrea, Co. Galway.**

Dear Secretary,

Inland Fisheries Ireland (IFI) is the State Body responsible for the protection, management and conservation of the inland fisheries and sea angling resource in Ireland. Protection of the aquatic environment and habitat is a vitally important element of IFI's work. IFI is mandated to ensure that the fisheries of the State are protected. "Fisheries" includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas where in fish deposit their eggs. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish stocks.

The application proposes the development of an existing public amenity area and carpark at Long Point, Lake Road, Loughrea, Co Galway. This site is located adjacent to the Lough Rea Special Area of Conservation (SAC) and Special Protection Area (SPA).

Fishing on Lough Rea is managed by the Loughrea Anglers' Association who also operate a small hatchery which stocks the lake with brown trout at the unfed fry stage. IFI fish surveys of the lake have also detected the presence of perch, rudd, pike, eel, three-spined stickleback and nine-spined stickleback.

Lough Rea is currently listed as of good ecological status and not at risk under the Water Framework Directive, a status that needs to be protected.

Having regard to these environmental sensitivities, IFI requests that consideration be given to the following points:

#### **Protection of water quality and fisheries habitat**

It is noted that the application includes mitigation measures to avoid impacts on water quality during the construction phase of the project. These measures are set out in the Construction and Environmental Management Plan (CEMP) and have been incorporated into the design of the proposed works. IFI would also request that should the development be granted permission, it be a



**Iascach Iníre Éireann  
Inland Fisheries Ireland**

requirement that the appointed contractor(s) are made aware of IFI's guidance document for reference regarding the protection of fisheries watercourses during construction works in and adjacent to waters before the construction phase of the project commences:  
<https://www.fisheriesireland.ie/sites/default/files/migrated/docman/2016/Guidelines%20Report%202016.pdf>

#### **Invasive Species**

IFI notes that Section 3.1.3 Management of Invasive Species confirms that whilst no third schedule invasive species were noted onsite, should invasives be subsequently identified, an Invasive Species Management Plan (ISMP) will be produced by a suitably qualified ecology to manage any such species. IFI would request that it receive advanced notification should invasives be detected prior to the management of these species. Landscaping proposals for the development should require the use of native species from local stock. More information can be found at [Home - Invasives.ie](http://Home - Invasives.ie)

#### **Biosecurity**

IFI would request that a biosecurity/information station be incorporated into the proposed redevelopment of the public amenity area to prevent the inadvertent introduction of invasive species such as the zebra mussel which are present in the River Corrib into Lough Rea (see attached IFI's "Invasive Species Disinfection Guidelines for Paddle Sports" for reference).

#### **Response to Further Information - Section 3.1.3 - Further Information Item 2(iii)**

*Detailed materials and method for construction of the proposed slipway including any proposal to achieve increased depth of water adjacent for its operation or otherwise. "Prior to pumping, electrofishing will be carried out within the works area under licence from the NPWS by a qualified ecologist to remove any fish and move them into Lough Rea".*

The above statement is also referenced within the Updated NIS document and the Updated Construction and Environmental Management Plan. IFI wish to clarify that such an electrofishing operation will require a Section 14 Authorisation from the Inland Fisheries Division of the Department of Environment, Climate and Communications.

#### **Response to Further Information - Further Information Item 6**

*It is proposed to raise the existing electrical kiosk to 81.40m O.D. (Flood Risk Assessment design height) as shown and to fully seal the existing foul pump chamber against ingress by floodwaters. Therefore, it is considered that the foul water pumping station can effectively store and pump to the wastewater network negating the possibility of contamination during flood events.*

IFI notes this further information alongside Section 2.2.2.2 which states that the wastewater treatment system will undergo yearly inspections and maintenance to ensure sufficient use, and no faults have occurred. IFI would also request that a warning beacon light be installed as part of the proposed foul pumping station to draw attention to any potential faults which may arise within the system.

#### **Updated Construction and Environmental Management Plan**

Should any issues arise during the construction phase of the project which could potentially impact on the fisheries habitat, angling, salmonid/eel/lamprey migration within the Lough Rea catchment, IFI will require the cessation of works pending a satisfactory resolution to the methodology/issue in question.



**Iascach Iníre Éireann**  
**Inland Fisheries Ireland**

I would appreciate if An Coimisiún Pleanála could acknowledge receipt of this submission.

Yours sincerely

---

David Harrington  
Senior Fisheries Environmental Officer  
IFI Galway  
ACP-LP-0925