



Planning Ref: SDZ23A/0004

(Please quote in all related correspondence)

15 March 2023

Director of Services – Planning
South Dublin County Council
County Hall,
Belgard Square North,
Tallaght,
Dublin 24
D24 YNN5

Via email: pregistry@sdublincoco.ie

Re: Notification under Article 28 (Part 4) or Article 82 (Part 8) of the Planning and Development Regulations, 2001, as amended.

<p>Proposed Development: 385 dwelling units (139 houses, 70 Build-to-Rent duplex / apartments, 72 duplex in the townland of Adamstown, Lucan, Co. Dublin</p>

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

It is noted that the proposed development site is relatively large in scale (c. 8.94 Ha). It is possible that hitherto previously unknown archaeological features/deposits may be disturbed during the course of groundworks required for the proposed development.

Furthermore, an archaeological investigation within the road-take of the Adamstown link road (ALR) at the rear of the old Lucan train station, carried out under number Licence No. 05E1295 identified a burial ground that included human remains representing at least 44 individuals.



The Department is in receipt of a report titled *Planning Application Report – Proposed Residential Development and All associated and Ancillary Works* by Stephen Little & Associates. According to the report:

The Planning Scheme ...includes the following key principle for Biodiversity and Natural Heritage: - “To ensure that the high archaeological potential of the SDZ lands is fully considered and valued throughout the design and construction process”.

the application site is not within an archaeological zone... the Planning Authority (is invited) to attach a reasonable condition of permission requiring that construction works be monitored by a suitable qualified archaeologist.

The Department notes that this report was not written by a suitably qualified archaeologist. The Department notes that the quoted key principle of ensuring the consideration of the high archaeological potential of the SDZ lands in no way relates to Biodiversity and Natural Heritage, but rather to Cultural Heritage.

Given that no archaeological assessment has been carried out, the Department questions the assertion that the proposed development site ‘is not within an archaeological zone’. The Department does not agree with the recommendation for archaeological monitoring. Given the large scale of the proposed development, and in line with national policy—see Section 3.7.2 of Frameworks and Principles for the Protection of the Archaeological Heritage 1999—, the Department recommends that an Archaeological Impact Assessment (including Archaeological Geophysical Survey and Archaeological Test Excavation) be carried out as Further Information.

A report containing the results of this assessment should be submitted to this Department and the Planning Authority prior to any planning decision so as to facilitate the formulation of an appropriate and informed archaeological recommendation.

Request for Further Information

The Archaeological Impact Assessment shall be carried out as follows:

1. The applicant is required to engage the services of a suitably qualified Archaeologist to carry out an Archaeological Impact Assessment (AIA) which should include a programme of Archaeological Geophysical Survey and Archaeological Test Excavation to respond to this request for Further Information. No sub-surface work shall be undertaken in the absence of the archaeologist without his/her express consent.



2. The archaeologist shall inspect the proposed development site (PDS) and detail the historical and archaeological background of the site (consulting appropriate documentary sources), and review all cartographic sources and aerial photographs for the area.
3. The Archaeological Geophysical Survey must be carried out under licence from this Department and in accordance with an approved method statement; note a period of 2-3 weeks should be allowed to facilitate processing and approval of the licence application and method statement.
4. The Archaeological Test Excavation must be carried out under licence from this Department and in accordance with an approved method statement; note a period of 5-6 weeks should be allowed to facilitate processing and approval of the licence application and method statement.
5. Test trenches shall be excavated at locations chosen by the archaeologist, having consulted the site drawings and the results of the Archaeological Geophysical Survey. Excavation is to take place to the uppermost archaeological horizons only, where they survive. Where archaeological material is shown to be present, the archaeologist shall stop works pending further advice from this Department. Please note that all features/archaeological surfaces within the test trenches are to be hand-cleaned and clearly visible for photographic purposes.
6. Having completed the work, the archaeologist shall submit a written report to this Department and the Local Authority describing the findings of the AIA including the results of the geophysical survey and test excavations. The report shall comment on the degree to which the extent, location and levels of all proposed foundations, service trenches and other sub-surface works required for the development will affect the archaeological remains. This should be illustrated with appropriate plans, sections, etc.
7. Where archaeological material is shown to be present, further mitigation measures will be required; these may include refusal, redesign to allow for preservation in situ, excavation and/or monitoring as deemed appropriate. This Department will advise the Local Authority with regard to these matters. No decision should be made on this application until this Department and the Local Authority have had the opportunity to fully evaluate the findings of the AIA.



Reason: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at referrals@npws.gov.ie.

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Edel Griffin
Development Applications Unit
Administration