



Planning Ref: SDZ23A/0004

(Please quote in all related correspondence)

30 November 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.

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

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 has been previously 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.

The Department is in receipt of a report titled 'Archaeological Assessment at Adamstown, Clonburris SDZ, Lucan, Co. Dublin Licence No: 23E0458' by Fergal Murtagh of IAC Ltd. According to the report, a geophysical survey was carried out in part of the proposed development site under Licence 23R0251. Archaeological testing was subsequently carried out in part of the proposed development site under Licence 23E0458. Two areas of archaeological significance, which have been designated as Archaeological Areas 1 and 2



(AA1 and AA2) were identified during testing. These comprise a possible figure-of-eight shaped kiln (AA1) and a sub-circular feature containing charcoal and shattered stone (AA2).

According to the submitted FI report:

‘human remains were identified and excavated c. 40m to the northwest of the development area, along the Adamstown Link Road (Bennett 2005:379, Licence No. 05E1295). The excavated remains comprised 43 adults and one infant’ (p. 5).

The Department notes that the northern area of the proposed development site was not suitable for geophysical survey or archaeological testing due to the presence of overhead power lines.

The Department would have concerns over the potential for archaeological features and/deposits to survive within a part of the proposed development site that has not been subject to archaeological investigations.

It is recommended in the report that all ground disturbances associated with the proposed development be monitored by a suitable qualified archaeologist and the archaeological features AA1 and AA2 be preserved by record. The Department partially agrees with this recommendation.

Therefore, 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 archaeological monitoring, as described below, should be required as a Condition of planning.

Note this recommended condition aligns with Sample Condition C.3 and C.4 as set out in OPR Practice Note PN03: Planning Conditions (October 2022).

Recommended Archaeological Condition:

1. The developer shall engage a suitably qualified archaeologist to monitor (licensed under the National Monuments Acts) all topsoil stripping associated with the development as an archaeological exercise and in advance of any site preparation works or other groundworks. Topsoil stripping may take place on a phased basis.
2. The use of appropriate machinery to ensure the preservation and recording of any surviving archaeological remains shall be necessary. Topsoil/overburden will be carefully removed to expose the full extent of any potential archaeological remains.



Excavation will extend to the top of in situ archaeological remains only. Any exposed archaeological features and deposits will be cleaned back by hand with sample hand excavation of sections through features not directly assessed during the previous test excavation.

3. Should archaeological remains be identified during the course of archaeological monitoring, all works shall cease in the area of archaeological interest pending a decision of the planning authority, in consultation with the National Monuments Service of this Department, regarding appropriate mitigation [preservation in-situ/excavation].
4. The developer shall facilitate the archaeologist in recording any remains identified. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service of this Department, shall be complied with by the developer.
5. Following the completion of all archaeological work on site and any necessary post-excavation specialist analysis, the planning authority and the National Monuments Service of this Department shall be furnished with a final archaeological report describing the results of the monitoring and any subsequent required archaeological investigative work/excavation required. All resulting and associated archaeological costs shall be borne by the developer.

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

Please note that it is strongly recommended that the wording of the Archaeological Condition above be retained in the grant of permission to ensure that the archaeological requirements are understood and carried out by the relevant professional.

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