



Planning Ref: ABP-313322-22

(Please quote in all related correspondence)

17th May 2022

The Strategic Housing Unit
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email: strategichousing@pleanala.ie

Re: Notification under the Planning and Development (Housing) and Residential Tenancies Act 2016; Planning and Development (Strategic Housing Development) Regulations 2017

Proposed Development: SHD development for 402 apartments, 41 terraced houses and all associated works at Carrickmines Great and Brennanstown, Carrickmines, Dublin 18.

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.

Nature Conservation

Having considered the documentation supporting this application, this Department notes that the site of the proposed development straddles the Carrickmines River, part of the Loughlinstown River system which supports both brown and sea trout populations, as well as dipper, kingfisher and otter. Pollutants entering the Carrickmines Stream could therefore have detrimental impacts on this fauna. In addition the Natura Impact Statement (NIS) supporting this application on a precautionary basis identifies the possibility that pollutants transported downstream into Killiney Bay by the Carrickmines/Loughlinstown River could reach and have detrimental effects on the Rockabill to Dalkey Island Special Area of Conservation (SAC). A suite of mitigation measures to avoid mobilisation of polluting materials from the development site through surface runoff into the Carrickmines Stream is therefore set out in the Natura Impact Statement (NIS) supporting the current application. If implemented fully, these measures should prevent

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



any pollution and consequent detrimental effects on the Carrickmines Stream and the Rockabill to Dalkey Islands SAC.

In the course of bird surveys on the development site fifteen bird species were recorded which nest in trees and shrubs. Any clearance of woody vegetation from the development site during the bird breeding season can consequently be expected to result in the destruction of nests, eggs and nestlings.

Bat surveys of the development site recorded its use by two species of bats at least five species of bats for foraging, the Leisler's bat and the common pipistrelle, but surveys of nearby sites in connection with other development proposals have identified the presence of four other bat species in the area, including the light sensitive Daubenton's, Natterier's and long-eared bats. To preserve bat usage of the development site area as far as is feasible bat friendly lighting is therefore required in the proposed development.

Recommendations:

In the light of the above it is recommended that the Board should attach conditions on the following lines to any planning permission granted in response to the current application:

1. That the measures proposed in the Natura Impact Statement supporting this application to prevent pollution from the development site being mobilised into surface water runoff shall be incorporated in a finalised Construction Environment Management Plan to be submitted to the planning authority for its written agreement before the commencement of any works on site, and to be implemented in full.

Reason: To avoid detrimental effects on the flora and fauna of the Carrickmines Stream and downstream the Rockabill to Dalkey Island SAC resulting from water borne pollution originating from the proposed development.

2. That clearance of vegetation from the development site shall only be undertaken outside the main bird breeding season i.e from September to February inclusive.

Reason: To avoid the destruction of bird nests, eggs and nestlings.

3. That the measures proposed in the Bat Report supporting the present application regarding the felling of possible bat roost trees boxes shall be implemented in full.

Reason: To avoid injury to bat species.

4. That a finalised external and internal lighting design scheme for the proposed development signed off on by a bat specialist shall be submitted to the planning authority for their written agreement before the commencement of development on site, this lighting design be implemented in full.

Reason: To conserve bat species which are afforded a regime of strict protection under the Habitats Directive (92/43/EEC).



Archaeology

It is noted that an EIAR (dated April 2022) was submitted with the application documentation. Chapter 13 of the EIAR considered Cultural Heritage and Archaeology and was prepared by Ms F. Bailey and Ms M. Tobin of Irish Archaeological Consultancy (IAC) Limited. It is noted that a desk based assessment, site inspection, geophysical survey (18R0197) and targeted archaeological test excavation (18E0650) was carried out. Archaeological lifting and excavation of certain archaeological features (urn burials) was undertaken (18E0650ext.). Targeted testing of the geophysical anomalies revealed seven areas of subsurface archaeology labelled AA1–AA7, comprising pennanular ditch with associated urn burials (AA1); 2 single pits (AA2–AA3); four areas of burnt mound material (AA4–AA7). It is likely that these features may relate to archaeological features previously excavated to the southwest in advance of another development. Suggested mitigation to alleviate the predicted negative impacts on the cultural heritage and archaeology resource were outlined in section 13.7 of the EIAR (page 13–13), and this is also noted.

In light of the work already undertaken and the suggested mitigation in the EIAR, the National Monuments Service agrees with the mitigation outlined in the EIAR and now recommends that the following be carried out as a condition of any grant of planning permission:

Archaeological Conditions:

The applicant is required to engage the services of a suitably qualified, licenced Archaeologist to carry out further full excavation (preservation by record) of the features identified in areas AA1–AA7 and archaeological monitoring of the development groundworks.

Archaeological excavation shall take place of the features in AA1–AA7 (as shown on Fig. 13.4, page 13–23 of the EIAR). Archaeological monitoring shall take place of the all associated groundworks of the development. No groundworks shall be undertaken in the absence of the archaeologist without his/her express consent. Please allow 5-6 weeks to facilitate the processing of an archaeological licence. Archaeological excavation shall include:

1. The archaeologist shall inspect the proposed development site (PDS), detail the historical and archaeological background of the site and review all cartographic sources and aerial photographs for the area.
2. Archaeological excavation (preservation by record) shall take place under licence (as an extension to 18E0650ext. as some features have been previously excavated). This shall follow a method statement agreed and approved in advance by the NMS of those areas identified in the EIAR, AA1–AA7, which revealed archaeological features after testing. A wider area shall be agreed with the NMS to be topsoil



stripped around AA1–AA7 to ensure all associated archaeological features are identified and preserved by record.

3. Archaeological monitoring shall take place of all groundworks associated with the development.
4. Should significant archaeological features be found during this monitoring, any works which would affect them shall cease pending agreement with the National Monument Service as to how they are to be dealt with. Where archaeological material/features are shown to be present, preservation *in situ*, preservation by record (excavation), or further monitoring may be required.
5. Having completed this work, the archaeologist shall submit a written preliminary stratigraphic report to the Local Authority, An Bord Pleanála, and to the Department of Housing, Local Government and Heritage outlining the results of the excavations and archaeological monitoring. This should be illustrated with appropriate plans, sections, etc. Within 12 months of the completion of the project the archaeologist shall submit a final report to the Local Authority, An Bord Pleanála, and to the DHLGH detailing the full archaeological excavation, and all specialist reports (where required).

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, thank you.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at manager.dau@housing.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



A handwritten signature in purple ink, reading "Simon Dolan", positioned above a horizontal line.

Simon Dolan
Development Applications Unit
Administration