Our Case Number: ABP-319013-24



Department of Housing, Local Government and Heritage Newtown Road Wexford Co. Wexford Y35 AP90

Date: 04 April 2024

Re: Replacement of existing biomass-fired boilers, biomass-fired thermal fluid heater and gas-fired thermal fluid heater at Medite's manufacturing plant.

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 Murphy Executive Officer

Direct Line: 01-8737275

PA09

Email

Lauren Murphy

From:

Housing Manager DAU < Manager. DAU@npws.gov.ie>

Sent:

Tuesday, April 2, 2024 2:11 PM

To:

SIDS

Cc:

LAPS

Subject:

ABP-319013-24

Attachments:

SID - ABP-319013-24 Tipperary SID-TCC-2024-008.pdf

Categories:

Lauren

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.

Our Ref: SID-TCC-2024-008

A Chara,

Please find attached Heritage Related recommendations for the above mentioned SID application.

Regards

Diarmuid

Diarmuid Buttimer

Executive Officer

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

Diarmuid.Buttimer@npws.gov.ie Manager.DAU@npws.gov.ie

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



Your Ref: **ABP-319013-24** Our Ref: **SID-TCC-2024-008**

2 April 2024

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

Via email to laps@pleanala.ie; sids@pleanala.ie

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

SID Application: Medite Europe DAC: ABP-319013-24 - Replacement of the existing three wood biomass fired thermal energy systems serving MEDITE's two production lines with, 2 no. renewable energy, wood biomass fired Thermal Fluid Heaters with thermal capacity of 60MW and 30MW respectively: Redmondstown, Clonmel, Co Tipperary

A chara

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

Archaeology

It is noted that the EIAR submitted as part of the planning application includes a desk-based Archaeological Impact Assessment (AIA) which was carried out in relation to the proposed development by Charles Mount Consultant Archaeologist (EIAR Chapter 12; date January 2024).

It is noted that field inspection carried out as part of the assessment has identified a low-relief earthwork in Area 4 of the Proposed Development Site (PDS). This may represent the remains of a circular to sub-circular enclosure and as such should be regarded as an area of very high archaeological potential with a strong likelihood that extensive sub-surface archaeological features or deposits could be present in addition to the upstanding low-relief earthwork remains. Known archaeological sites with similar morphology can date from a range of periods (both prehistoric and early historic); while some may be settlement sites, others have had ritual or funerary uses. It is noted that the footprint of this earthwork feature as identified in the field survey lies partially within the area proposed for native woodland planting to replace the stand of trees that would have to be felled in Area 2 of the PDS to facilitate the proposed development. It is noted that no advance archaeological geophysical survey or advance archaeological test excavation has been carried out to better understand the character and full extent of this site and to further inform the assessment.



Afforestation/tree-planting would have a significant direct negative impact on any upstanding and sub-surface archaeological features within the area where new woodland is proposed (see EIAR Section 12.57), this will include a substantial section of this new earthwork site. It is noted that Section 12.64 of the EIAR proposes that a programme of archaeological monitoring of construction-stage groundworks (including the tree-planting programme) would be sufficient to mitigate the impact to this earthwork site and its associated area of archaeological potential. The Department, however, advises that more detailed assessment of this earthwork site should be carried out prior to the commencement of construction (and any new landscaping/tree-planting). The Department advises that this should be done by way of a programme of archaeological geophysical survey and archaeological test excavation within Area 4 of the PDS.

If Further Information is being requested by the Board, it may be beneficial to consider including clarification of the aforementioned points as part of the request.

Notwithstanding this, the National Monuments Service (NMS), Department of Housing, Local Government and Heritage advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C3, C5 and C6 as set out in *OPR Practice Note PN03: Planning Conditions* (October 2022), with appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

Archaeological Requirements:

- All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 12 of the EIAR (Charles Mount Consultant Archaeologist; date January 2024) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
- 2. The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out a pre-development Archaeological Geophysical Survey and a pre-development Archaeological Test Excavation at Area 4 of the development site and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the Department, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works. This shall be in addition to any mitigation measures outlined in Chapter 12 of the EIAR.
 - a. The Archaeological Geophysical Survey must be carried out under licence from the Department and in accordance with an approved method statement. Having completed the work, the archaeologist shall submit a written report to the Department and the Planning Authority describing the results of the geophysical survey.
 - The archaeologist will liaise with the Department to establish—based on the results the Archaeological Geophysical Survey—the appropriate scope of the Archaeological Test Excavation to adequately characterise the character and



extent of any potential sub-surface archaeological material within Area 4 of the development site.

- c. The report on the Archaeological Test Excavation shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation insitu, preservation by record (archaeological excavation) and/or monitoring may be required.
- d. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the Department, shall be complied with by the developer.
- e. No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority.
- 3. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 12 of the EIAR and by any subsequent archaeological investigations associated with the project. 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 cultural heritage environment during all phases of site preparation and construction activity.
- 4. 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 work on site and any necessary post-excavation specialist analysis. 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.

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

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Diarmuid Buttimer
Development Applie

Development Applications Unit

Administration