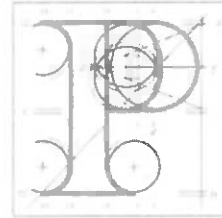


Our Case Number: ACP-323742-25



An
Coimisiún
Pleanála

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

Date: 11 November 2025

Re: Proposed development comprises the development of an extension to the existing Burial Ground at Drumcliff Burial Ground located at the Townland of Drumcliff, Ennis, Co. Clare
Drumcliff, Ennis, Co. Clare

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

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Kevin McGettigan

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

AA02

Teil
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Láithreán Gréasáin
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communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Tuesday, November 11, 2025 12:17 PM
To: LAPS <laps@pleanala.ie>
Cc: SIDS <sids@pleanala.ie>
Subject: S177AE Burial Ground at Drumcliff Burial Ground

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.

Your Ref: ACP-323742-25

Our Ref: 177AE Burial Ground at Drumcliff Burial Ground

Good afternoon,

Please find attached heritage-related observations/recommendations for the above mentioned consultation. I should be grateful if you could acknowledge receipt of same.

Regards,

Brian Bone
Executive Officer

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

Aonad na nIarratas ar Fhorbairt
Development Applications Unit

Oifigí an Rialtais, Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Government Offices, Newtown Road, Wexford, Co Wexford, Y35 AP90



Your Ref: ACP-323742-25

Our Ref: 177AE Burial Ground at Drumcliff Burial Ground
(Please quote in all related correspondence)

11 November 2025

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

Via email to: laps@pleanala.ie

Re: Notification under Section 177AE (4) (a) of the Planning and Development Act 2000 as amended (as inserted by Section 5 of the Planning and Development (Amendment) Act 2010.

Re: Section 177AE application by Clare County Council for the development of an extension to the existing Burial Ground at Drumcliff Burial Ground at Townland of Drumcliff, Ennis, Co Clare

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 (PDS) is located in proximity to, and associated with, Recorded Monuments CL033-033001- (Church), CL033-033002- (Graveyard) and CL033-033003- (Round Tower). These monuments are subject to statutory protection in the Record of Monuments and Places (RMP) established under Section 12 of the National Monuments (Amendment) Act 1994. Additionally, both the church and round tower are recognised as being of national significance. These monuments are thus designated National Monuments in State Guardianship and are afforded additional statutory protections under Section 14 of the National Monuments Act 1930, as amended (National Monument No. 204).



The Department has reviewed the desk-based 'Archaeological Impact Assessment' report submitted in support of the current planning application (prepared by Mr Risteard UaCróinín, dated February 2025) and notes that this report recommends completion of archaeological test excavation 'prior to development works commencing.' (Page 7). The Department considers that the baseline archaeological environment has not been adequately characterised in the desk-based archaeological report submitted and that there is, therefore, insufficient information upon which to make an informed and appropriate archaeological recommendation.

It is further noted that a previous Part VIII application (Ref: 22/8008) for development of this site was referred to the Department on 14 September 2022 and subsequent recommendations made by the Department included completion of an Archaeological Impact Assessment to comprise a geophysical survey and archaeological test excavation in advance of development.

Please note that whilst geophysical survey (Minarex Geophysics Ltd, December 2022) and geotechnical site investigations (P Coleman & Associates; April 2025) have been conducted at the PDS in support of this planning application, these works were not carried out for archaeological purposes or under archaeological supervision.

National policy for the protection of the archaeological heritage states that there should always be a presumption in favour of avoiding developmental impacts on archaeological heritage – see Part III of Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland, 1999). It is generally preferable that archaeological works are completed prior to a planning decision being made (e.g. via a Request for Further Information where necessary) as this facilitates making informed and appropriate archaeological recommendations. This also ameliorates risk to development costings and scheduling where sub-surface archaeological features/material are shown to be present.

Therefore, in line with aforesaid national policy – see Section 3.6.2 of Framework and Principles for the Protection of the Archaeological Heritage (1999) – the Department advises that an Archaeological Impact Assessment, as described below, should be carried out as a condition of any grant of planning approval that may issue.

Note, these recommended conditions align with Sample Conditions C.2 and C.5 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 the findings of the desk-based archaeological report.



It is strongly recommended that the below wording be reproduced verbatim in the schedule of conditions of any planning approval that may issue, in order to ensure that appropriate archaeological mitigation at this archaeologically sensitive site takes place in advance of commencement of development.

The Archaeological Impact Assessment should be carried out as follows:

1. The applicant/developer shall engage a suitably qualified Archaeologist to carry out an Archaeological Impact Assessment (AIA) in advance of any site preparation works and groundworks, including site investigation works preparatory/enabling works, topsoil stripping, site clearance or construction works.
2. The AIA shall involve an examination of all development layout/design drawings, completion of documentary/cartographic/photographic research and fieldwork, the latter to include archaeological geophysical survey and archaeological test excavation (consented/licensed as required under the National Monuments Acts and in accordance with approved works method statements).
3. 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 suspend works in the area of archaeological interest pending further advice from the Planning Authority, in consultation with the Department. Please note that all features/archaeological surfaces within the test trenches are to be hand-cleaned and clearly visible for photographic purposes.
4. The Archaeologist shall prepare a comprehensive report, including an archaeological impact statement and mitigation strategy, to be submitted for the written agreement of the Planning Authority in advance of any site preparation works, groundworks and/or construction works.
5. Where archaeological remains are shown to be present, preservation in situ, establishment of 'buffer zones', preservation by record (archaeological excavation) or archaeological monitoring may be required and mitigatory measures to ensure the preservation and/or recording of archaeological remains shall be included in the AIA. Any further archaeological mitigation requirements specified by the Planning Authority, following consultation with the National Monuments Service of the Department, shall be complied with by the applicant/developer.



6. The Planning Authority and the National Monuments Service of the Department shall be furnished with a final archaeological report describing the results of any subsequent archaeological investigative works and/or monitoring following the completion of all archaeological work on site and the completion of any necessary post-excavation work. All resulting and associated archaeological costs shall be borne by the applicant/developer.
7. The Construction Environmental Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development. 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.

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, or to the following address:

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

Is mise, le meas,

Cormac O'Flaherty
Higher Executive Officer
Development Applications Unit
Administration