

Appendix 14.1

Correspondence

14.1 Archaeological, Architectural and Cultural Heritage – Correspondence

14.1.1 2016 EIS Correspondence

14.1.1.1 Correspondence sent to and received from County Archaeologist (Cork County Council)

I am involved in an EIS for a new waste management facility at Ringaskiddy by Indaver (aerial photo attached). An application was submitted for the same site in 2008.

I understand that Arup have already met the council and briefed them on the proposal which is to be submitted as a strategic infrastructure development during this year.

There are no Recorded Monuments or Protected Structures within the development site. Ringaskiddy Martello Tower which is both a Recorded Monument (CO087-053) and Protected Structure (RPS 00575) is in ground adjoining to the south.

If you have any particular issues or queries that you would like addressed in the EIS regarding the development please don't hesitate to contact me.

Reply:-

I was not aware that Arup had already met the council. Regarding your query if it is the same development site as the 2008 application, I assume you will look at the same issues in terms of visual, physical and landscape issues in relation to the Martello Tower and the wider military landscape of Cork Harbour. There has been significant works in terms of heritage tourism within the Cork Harbour Area since 2008 and the impact of the proposed development on the architectural/archaeological and cultural heritage of the harbour area is an element that will need to be addressed in detail and certainly this was something that was considered to be deficient by ABP under the previous application.

I hope this is of some assistance to you.

14.1.1.2 Correspondence sent to and received from National Monuments Service Archaeologist for County Cork

I am involved in an EIS for a new waste management facility at Ringaskiddy by Indaver. An application was submitted for the same site in 2008.

Correspondence has already been submitted to the Development Application Unit by Arup (attached) and a reply received reference G Pre0050/2015 (also attached).

There are no Recorded Monuments within the development site, the nearest is a Martello tower (CO087-053) in ground adjoining to the south.

If you have any particular issues or queries that you would like addressed in the EIS regarding the development please don't hesitate to contact me.

Reply:-

I have reviewed the documentation we have on file. I made a note on our database that I needed to review the Cultural Heritage Impact Assessment before commenting further. However Dr Connie Kelleher in the Underwater Archaeology Unit of NMS issued observations to our Development Applications Unit on 11/03/2015, in which she stated that an Underwater Archaeological Assessment was also required this recommendation formally issued to Arup on 30-03-2015. Maybe you haven't seen this letter yet? I believe the letter issued to Ms Fiona Patterson in ARUP.

The specifics in relation to Dr Kelleher's requirements are detailed in this letter. The email you attached here relates to our response to a request for a meeting on 18th February - this pre-dates the additional correspondence sent to ARUP on 30-03-2015. I hope this clarifies things.

14.1.1.3 Correspondence sent to and received from the Underwater Archaeology Unit, National Monuments Service

You may remember an application in 2008 for a waste to energy facility at Ringaskiddy by Indaver which didn't get through planning at the time. Debbie Sutton probably contacted you with some queries about it and I subsequently did an intertidal and metal detection survey on Gobby Beach in about 2010 on foot of a further information request from Bord Pleanála.

Indaver are putting together a new application for the same site which is at the eastern tip of the Ringaskiddy peninsula with the Martello tower to the south of it and Gobby Beach to the east. One of the problem areas in the 2008 application was potential coastal erosion and Indaver are proposing beach nourishment to mitigate this. This would involve depositing cobbles along the toe of the cliff adjoining Gobby Beach along the eastern site boundary to Indaver. No excavation would be required for this but the cobbles would need to be brought to the cliff base from the car park at Gobby Beach which immediately adjoins it to the north. This would require trucks traversing the beach along the length of the Indaver site boundary and a machine would need to grade the cobbles once deposited. I don't have a more detailed methodology on this yet.

The intertidal and metal detection survey done in 2010 found nothing along the Indaver site boundary but I covered the adjoining area to the north of this as well, basically from the Gobby Beach car park for some distance north and identified a few features, most of which were previously identified by Donal Boland in 2006 when he did an intertidal survey of the same area (a bridge to Spike Island was proposed at the time). The features are a section of sheet piling on the seaward side of the car park and beside it the remains of approximately 7 small timber uprights with a deposit of concrete to the south. Further to the north the metal frame, probably of a small boat, was submerged in the shallow water just beyond the low tide mark, this wasn't mentioned in the 2006 report by Boland. An L-shaped metal girder was partially buried in a soft sandy area and beside it a section of pipeline. A small deposit of rock armour was present at the landward edge of the beach where the road to Rocky Island lies immediately beside the strand.

The movement of trucks and a machine across the strand may have an archaeological impact which will require mitigation. I was going to propose monitoring of the coastal protection works and confining movement of trucks to a designated route along the strand. Do you think this sounds appropriate?

Reply:-

I would be inclined to ask for a new intertidal as there are a lot of years since it was last done and we would need to know if there was anything else now exposed or if that previously identified is still there. I think the application is in at the moment here, so I will be asking for that.

Let me know if you have any more details and I can comment on it.

14.1.2 2019 EIAR - IE Licence Application Correspondence

14.1.2.1 Correspondence sent to and received from County Archaeologist (Cork County Council) between March and May 2015

I am involved in an EIS for a new waste management facility at Ringaskiddy by Indaver (aerial photo attached). An application was submitted for the same site in 2008.

I understand that Arup have already met the council and briefed them on the proposal which is to be submitted as a strategic infrastructure development during this year.

There are no Recorded Monuments or Protected Structures within the development site. Ringaskiddy Martello Tower which is both a Recorded Monument (CO087-053) and Protected Structure (RPS 00575) is in ground adjoining to the south.

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Reply:-

As noted in your e-mail there are no Recorded Monuments within the development site and no new sites occur in the area. Outside of the usual content of an Archaeological assessment for the EIS, the Martello Tower (Recorded Monument CO087-053 & Protected Structure RPS 00575) is the main immediate archaeological concern and the visual impact of the proposed development, this is particularly pertinent in regards the tower which must be seen as part of a wider network of other Martello towers and military installations in the harbour where inter visibility is a key issue.

In addition Cork harbour is been developed as a tourism attraction – included as a tourist attraction are a number of heritage sites such as Spike island, Camden and Cobh itself which has been developed since the last planning application in 2008. The assessment should address the impact of the proposed development cultural heritage of the wider harbour area in this regard both in terms of visual impact in regards to the (a) as archaeological /architectural heritage and the (b) as a tourism asset.

14.1.2.2 Correspondence sent to and received from Conservation Officer (Cork County Council) between March and May 2015

I am involved in an EIS for a new waste management facility at Ringaskiddy by Indaver (aerial photo attached). An application was submitted for the same site in 2008.

I understand that Arup have already met the council and briefed them on the proposal which is to be submitted as a strategic infrastructure development during this year.

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14.1.2.3 Correspondence sent to and received from National Monuments Service Archaeologist for County Cork between March and May 2015

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The specifics in relation to Dr Kelleher's requirements are detailed in this letter. The email you attached here relates to our response to a request for a meeting on 18th February - this pre-dates the additional correspondence sent to ARUP on 30-03-2015. I hope this clarifies things.

14.1.2.4 Correspondence sent to and received from the Underwater Archaeology Unit, National Monuments Service between March and April 2015

You may remember an application in 2008 for a waste to energy facility at Ringaskiddy by Indaver which didn't get through planning at the time. Debbie Sutton probably contacted you with some queries about it and I subsequently did an intertidal and metal detection survey on Gobby Beach in about 2010 on foot of a further information request from Bord Pleanála.

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14.1.3 Updated EIS 2025 – Correspondence

14.1.3.1 Correspondence with Cork County Archaeologist (Cork County Council)

Letter from Avril Purcell to Ms Annette Quinn – 10/03/2025

LANE PURCELL ARCHAEOLOGY
Consultant Archaeologists

64 Fr Mathew Road
Turner's Cross, Cork
Tel: (0)21 4808155
Mob: (0)87 2212077
Email: info@lpa.ie
www.lanepurcellarchaeology.ie



10th March 2025

Ms Annette Quinn
Cork County Archaeologist,
Cork County Council,
County Hall,
Carrigrohane Road,
Cork

Regarding: Proposed Resource Recovery Centre (Including Waste-to-Energy Facility) Ringaskiddy

Dear Annette,

Thanks for making the time to visit the Ringaskiddy site and walk it with us recently. It was really useful to discuss the proposed development on the site and to see the existing ground conditions. As we discussed the proposed development is unchanged from the 2016 application but the land has become significantly more overgrown in the intervening years and the ongoing M28 construction works have altered the land at the northwest of the proposed development site.

Given the constraints on the site, it is proposed to include construction mitigation measures in the updated EIS/EIAR similar to those included in the 2016 EIS. This will include;

- (1) archaeological geophysics on suitable land in advance of construction
- (2) comprehensive archaeological testing in advance of construction
- (3) secure fencing of areas which will not be impacted by construction works in advance of development
- (4) archaeological monitoring of works on Gobby Beach
- (5) archaeological monitoring of ground works within the Lough Beg substation (to facilitate the electrical connection)

In 2016 the western fields (Area 1) were in tillage and were suitable for geophysical survey. However, the level of overgrowth that has developed in the fields in the intervening years is very substantial and even if vegetation was cut/ trimmed, the remaining roots and stumps may leave the land unsuitable for survey. A geophysical surveyor would have to be consulted following the removal of the vegetation to assess if survey would be possible. Regardless of whether geophysical survey could be undertaken, comprehensive archaeological testing following removal of the vegetation and in advance of construction will be carried out.

The eastern land (Area 2) where the proposed development will be located was not proposed for geophysical survey in 2016 due to the presence of dense scrub and trees and the steep gradient of the land. It was proposed to cut the vegetation in advance of construction and carry out comprehensive archaeological testing. The vegetation has become denser in this area in the intervening years and without extensive vegetation clearing meaningful testing could not be carried out. In line with the 2016 EIS comprehensive archaeological testing in advance of construction and following removal of the vegetation would be carried out.

In the 2016 EIS it was proposed to fence off the higher ground at the western end of the proposed development site (Areas 3 and 4) with the exception of the route of the amenity walkway from Gobby Beach to the Martello tower. No ground works are proposed in these lands and as the development is unchanged the same mitigation would be proposed. The amenity walkway will be built on a no-dig basis and thus will not require ground reduction and so will not impact potential archaeology.

The client has outlined that in the event of a grant of planning consent, construction activities within the subject site will not commence for some time. Detailed design, tendering and procurement of the construction contracts, in combination with some necessary enabling works within the public road, are likely to take more than a year in total, leaving ample time to remove vegetation, carry out all necessary archaeological investigations and resolve any archaeological matters that arise within the subject site. The client is aware that any archaeological deposits, features or finds identified within the footprint of the development will require preservation by record in consultation with the NMS and the planning authority. They are also aware that the financial cost arising from the archaeological works including excavation and post excavation are the responsibility of the developer and are agreeable to carrying out these works to professional standards of archaeological practice (as outlined in Policy Guidelines on Archaeological Excavation – Department of Arts, Heritage, Gaeltacht, and the Islands).

If you have any queries please do not hesitate to contact me.

Yours sincerely,



Avril Purcell MA MIAI



Plate 1 from 2016 EIS showing aerial view of the proposed development site subdivided into Areas 1-4

Email Response from Cork County Archaeologist – 11/03/2025

Hi Avril / Musetta,

Thanks for the letter detailing the proposal in terms of archaeological investigations and the intention to undertake archaeological investigations post-grant (should planning be received). The site inspection was mainly to ascertain whether or not archaeological investigations could be undertaken - pre-planning (including Geophysical Survey and testing).

Having seen the extent and density of the vegetation that has established itself on the site since 2015/6, it has rendered much of the site inaccessible by foot. I think the investigations (including Geophysics and testing) need to be meaningful and well planned and therefore I suspect that a significant amount of ground preparation work and clearance would have to take place across the site initially in order to make the site suitable for the testing / Geophysical Survey. I also understand that there are overhead lines on the site and a steep topography in places.

With these site constraints in mind, I am willing to accept that the testing and geophysical survey could take place post grant (if planning is received) but given that the area has produced many previously undetected sub-surface archaeological sites in recent years (in particular along the M28), the same risk applies to this site. Archaeological geophysical survey and testing should be planned as an advance pre-construction activity leaving enough time to obtain the necessary licenses, fieldwork, reporting and discussions around any finds/features detected and how they will be dealt with (including agreeing a mitigation strategy (preservation in situ / preservation by record etc). Any agreed archaeological resolution should also be planned well in advance of construction.

If you have any questions on the above, let me know.

Regards,

Annette Quinn

Cork County Hall, Cork, T12 R2NC, Ireland

Tel: 021-4285329 M 086-1688826

annette.quinn@corkcoco.ie

14.1.3.2 Correspondence with the Architectural Conservation Officers, Cork County Council

Email from Avril Purcell, Lane Purcell Archaeology to Architectural Conservation Officer – 17/04/2025

From: Avril Purcell

Organisation: Lane Purcell Archaeology

Address: 64 Fr Mathew Road, Turner's Cross, Cork

Phone: +353 21 4808155

Mobile: +353 87 2212077

Email: avril@lpa.ie

To: Dr Elena Turk and Emma [Surname if available]

Organisation: Cork County Council

Hi Elena and Emma,

I hope you are both well.

As you know we are carrying out the Archaeology Architecture and Cultural Heritage chapter for the EIAR for the proposed Indaver facility in Ringaskiddy. The application is unchanged from the 2016 application.

The previous grant of planning by Bord Pleanála (relating to the 2016 application) required monitoring of vibrations at the Martello Tower to be agreed with the planning authority (**Condition 17**). This will be carried out to your requirements, which we can include in the EIAR chapter if that is appropriate. If you

have any requirements or queries regarding the proposal or would like further details please do not hesitate to contact us.

Regards
Avril Purcell
Lane Purcell Archaeology,

Response from Dr Elena Turk, Architectural Conservation Officer – 08/07/2025

From: Dr Elena Turk
Title: Architectural Conservation Officer
Organisation: Cork County Council
Address: Cork County Hall, Cork, T12 R2NC, Ireland
Phone: 086-1031064
Email: elena.turk@corkcoco.ie

Hello Avril

Sincere apologies for the untimely delay in getting back to you on this, I can only cite the usual high workloads.

I agree, inclusion of proposal for monitoring of vibrations on the tower would be important. In devising this please provide for a consideration of potential physical impacts not only on the tower but on the surrounding circular walls.

It would also be important to acknowledge visual impacts on views to and from the tower- In the context of this tower that would extend to sight lines to nearby fortifications on Haulbowline and Spike Islands, and in the outer harbour at Camden and Carlisle Forts.

Hope this is sufficient for now, do feel free to get back to me if there are further concerns,

Kind regards
Elena