



Your Ref: ABP-319217-24

(Please quote in all related correspondence)

2 May 2024

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

Via email to [laps@pleanala.ie](mailto:laps@pleanala.ie)

Re: Notification under Section 131 of the Planning and Development Act, 2000, as amended.

**Re: Application for substitute consent for aggregate extraction and ancillary plant and welfare facility development on lands located at Redbog and Philipstown, County Kildare**

A Chara

I refer to correspondence received in connection with the above.

Outlined below are archaeological observations/recommendations of the Department.

It is noted that the remedial Environmental Impact Assessment Report (rEIAR) 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 (rEIAR Chapter 10; date February 2024).

Section 10.5.12 of the rEIAR states that:

*“The existing quarry and part of the current application area was the subject of an EIA carried out by Golder Associates that included an assessment of archaeology, architecture and cultural heritage carried out by the Archaeology Company in 2007 (Planning Reg. No. 07/267). The assessment identified no sites of archaeological significance associated with the lands under consideration. The assessment recommended that soil stripping of previously undisturbed land be monitored by a suitably qualified archaeologist. Conditions 53-58 of the 2009 grant of planning permission required that pre-development archaeological testing be carried out at the site.”*

It is not indicated in the rEIAR if the mitigation measures defined in the 2007 Environmental Impact Assessment (EIA) for the protection of archaeological heritage (i.e. a programme of archaeological monitoring) were implemented. It is not indicated in the rEIAR if Conditions 53-58 of the 2009 grant of planning permission (i.e. a programme of archaeological test



excavations) were complied with. The specification of these types of mitigation measures or planning conditions indicates that there was a potential that unknown sub-surface archaeological features may have been present with the application site. If these measures for the protection of archaeological heritage were not carried out then there is a potential that the quarrying activity to date may have resulted in direct negative impacts to such material.

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.

The Department further notes that a section of the southern boundary of the application site incorporates non-Statutory SMR site WI005-123---- (Deer park).

Therefore the Department advises that the following should be included as a condition of any grant of substitute consent.

Archaeological Requirements:

1. A suitably qualified archaeologist shall be retained to advise on, and establish an appropriate Exclusion Zone around the external-most elements of non-Statutory SMR site WI005-123---- (Deer park).
  - a. The Exclusion Zones shall be fenced off or appropriately demarcated for the duration of construction works in the vicinity of the monuments. The location and extent of each Exclusion Zone and the appropriate methodology for fencing off or demarcating at each location shall be agreed in advance with the Department and the Planning Authority.
  - b. No groundworks of any kind (including but not limited to advance geotechnical site investigations) and no machinery, storage of materials or any other activity related to construction will be permitted within the Exclusion Zones.
2. 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 10 of the rEIAR (Charles Mount Consultant Archaeologist; date February 2024) 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.

Reason:

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



In the event that additional heritage-related observations become available before the deadline date, a further letter will issue.

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

A handwritten signature in blue ink, which appears to read 'Sinéad O'Brien', is written over a horizontal line.

Sinéad O' Brien  
Development Applications Unit  
Administration