



Date: 18/01/2024
Your Ref: PC/PKS/01/23
Our Ref: DR-DR-A230419-0006

The County Secretary
Dún Laoghaire-Rathdown County Council

Re: Part 8 application by Dún Laoghaire-Rathdown County Council for a proposed development at Shanganagh Park (Phase 1) comprising the development of one grass pitch with floodlights, the amalgamation and upgrade of the baseball and cricket facilities, a sprint track with floodlights, basketball area and calisthenics equipment, upgrades to entrances, street furniture, upgrades at the railway crossing to include new paths and ramps/steps with lighting and play space, to include all earthworks, drainage, fencing and netting, tree planting, meadow and all ancillary works at Shanganagh Park.

A Chara,

We refer to notification of the receipt of archaeological reports that compile the results of investigations that were carried out at the site of the above development. Outlined below are the archaeological recommendations of the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage.

It has been previously noted that the proposed development site is relatively large in scale (approx. 8.7ha). It is possible that hitherto previously unknown archaeological features/deposits may be disturbed during the course of groundworks required for the proposed development.

The NMS is in receipt of reports titled 'Geophysical Survey Report Shanganagh, Shankill, Dublin 18. Licence No. 23R0312' by Dr Ger Dowling and 'Archaeological Assessment at Shanganagh Park, Shankill, Dublin 18. Licence No: 23E0758' by Mr Paul Duffy of Irish Archaeological Consultancy Ltd (IAC).

According to the geophysical survey report, several features of archaeological and possible archaeological interest, including a series of enclosures and a ring-ditch, as well as a possible early field system and other potential features were identified following a geophysical survey of the development site under Licence 23R0312.

According to the archaeological assessment report, archaeological testing under Licence 23E0758 was carried out at the development site to determine the extent and nature of potential archaeological features and previous land disturbances at the development site. The results of the geophysical survey were confirmed during archaeological testing.

Five areas of archaeological significance were identified during testing. Archaeological Area 1 / AA 1 comprised a sub-circular enclosure and an associated field system, a likely cereal-drying kiln and a pit. Artefacts included



animal bone and struck and worked flint. AA2 included a ring-ditch with an external pit and four smaller possible cremation pits. A probable trough and associated burnt mound were identified in AA3. A sub-circular enclosure, c. 35m in diameter, was identified in AA4. Activity associated with brick manufacture was identified in AA5. Finally, shallow linear features (C9, C22 and C24) of indeterminate date were identified traversing the development site. These linear features may represent post-medieval plough furrows.

According to the archaeological assessment report, the features identified in AA1 – 5 are of likely Bronze Age / Iron Age date and may form part of a larger prehistoric landscape, evidence of which has been identified at other nearby archaeological investigations.

The originally proposed design for the grass pitch and floodlights would have had a direct impact upon AA1, AA4 and AA5. According to the report, however, early consultation with the design team has allowed for the location of the pitch to be moved meaning that AA1, AA4 and AA5 can be preserved in situ. It is recommended that exclusion zones for construction traffic be set up around all known archaeology that is to be preserved in-situ.

The NMS welcomes this proposal that is in accordance with archaeological best practice and in line with national policy—see Section 3.4 of *Frameworks and Principles for the Protection of the Archaeological Heritage*, 1999.

According to the report, the ring-ditch and associated features at AA2 and the possible trough at AA3 will be impacted by the development works. It is recommended in the report that the archaeological features in AA2 and AA3 be preserved by record, i.e. excavated.

The NMS agrees with this recommendation.

It is further recommended that partial excavation of the linear features C9, C22 and C24 be may be sufficient to determine their nature.

The NMS agrees with this recommendation, however, further consultation may be required in the form of revised archaeological method statements dependent on the archaeological nature of these features.

It is recommended that all ground disturbances associated with the proposed development be monitored by a suitably qualified archaeologist.

While the NMS agrees with this recommendation, it is further recommended, given the significant archaeological results of the geophysical survey and the archaeological testing to date, that all areas of ground disturbance below present ground level be monitored as an archaeological exercise and under licence to the NMS.

Therefore, due to the scale of the proposed development, the National Monuments Service (NMS), Department of Housing, Local Government and Heritage recommends that the establishment of **Exclusion Zones, Archaeological Monitoring and Archaeological Preservation by record** be carried out at the development site. A report containing the results of the archaeological monitoring and preservation by record should be submitted to the NMS and the Planning Authority.



Archaeological recommendations

The Archaeological Impact Assessment shall be carried out as follows:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in the report titled 'Archaeological Assessment at Shanganagh Park, Shankill, Dublin 18. Licence No: 23E0758' by Mr Paul Duffy of Irish Archaeological Consultancy Ltd, should be implemented, except as may otherwise be required in order to comply with the following conditions.
2. The applicant shall retain the services of a suitably qualified archaeologist to advise on, and establish suitable buffer zones around the external-most elements of the archaeological sites AA1, AA4 and AA5 as identified under Licence No 23E0758.
 - a. No groundworks of any kind (including but not limited to advance geotechnical site investigations) will be permitted within buffer zones.
 - b. Buffer Zones shall be fenced off for the duration of construction works in the vicinity of the monuments. No machinery, storage of materials or any other activity related to construction will be permitted within Buffer Zones.
3. The applicant is required to employ a suitably qualified, archaeologist to monitor all ground disturbance required for this development. No groundworks of any type (including any enabling works or advance site investigations) are to take place in the absence of the archaeologist without his/her express consent.
 - a. The archaeological monitoring programme must be carried out under licence from the National Monuments Service (NMS) and in accordance with an agreed method statement; note a period of 5-6 weeks should be allowed to facilitate processing and approval of the licence application and method statement.
 - b. The method statement will include methodology for the preservation by record of features AA2, AA3, C9, C22 and C24 that were identified during testing under Licence 23E0758.
 - c. Should additional archaeological material be found during the course of the archaeological monitoring, the archaeologist shall stop work on the site pending a decision as to how best to deal with the archaeology. The applicant shall be prepared to be advised by the NMS with regard to any necessary mitigating action e.g. preservation in situ, and/or excavation. The applicant shall facilitate the archaeologist in recording any material found.
 - d. The NMS and the Local Authority shall be furnished with a report describing the results of the monitoring.
4. The Construction Environment Management Plan (CEMP) shall incorporate all significant findings from the reports titled 'Geophysical Survey Report Shanganagh, Shankill, Dublin 18. Licence No. 23R0312'



by Dr Ger Dowling and 'Archaeological Assessment at Shanganagh Park, Shankill, Dublin 18. Licence No: 23E0758' by Mr Paul Duffy including (but not limited to) the location of any archaeological or cultural heritage constraints relevant to the proposed development. The CEMP shall clearly describe all identified likely impacts—both direct and indirect—and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of construction activity. It shall have particular regard to the requirements as set out at part 2 of this Condition above in relation to establishment and characteristics of the protective buffer zones that will be implemented to ensure preservation in situ of archaeological sites and monuments.

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

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Níall Garahy
Archaeologist,
National Monuments Service,
Dept. of Housing, Heritage and Local Government

