

Dorota Richards

Subject: FW: IPCC Licence application P0914-01
Attachments: EPA0914-01.pdf; ATT00001.txt; ATT00002.htm

From: Manager Dau [<mailto:Manager.Dau@ahg.gov.ie>]
Sent: 09 February 2015 15:00
To: Wexford Receptionist
Subject: IPCC Licence application P0914-01

A chara,

Attached please find the archaeological recommendations of the Department of Arts, Heritage and The Gaeltacht for the above mentioned IPCC application.

Mise le meas,

Simon Dolan
Development Applications Unit
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Newtown Road
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tel: 0539117377



*An Roinn
Ealaíon, Oidhreachta agus Gaeltachta
Department of
Arts, Heritage and the Gaeltacht*

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Department of
Arts, Heritage and the Gaeltacht

Licence Ref: 0914-01

(Please quote this reference in all related correspondence)

09 February 2015

Sonja Smith
Programme Officer
Environmental Licensing Programme
Office of Climate, Licensing & Resource Use
Environmental Protection Agency
Inniscarra
Co Cork

Re: Application for IPPC Licence by Westland Horticulture at Mayne, Ballinealoe & Lower Coole near Coole and at Clonsura near Fineagh in County Westmeath.

A Chara

On behalf of the Department of Arts, Heritage and the Gaeltacht, I refer to your authority's notification in relation to the above.

Outlined below are the observations and recommendations of the Department in relation archaeology.

The Department refer to the EPA notification in relation to the above IPPC License application. Due to an oversight, IPPC licenses requiring Environmental Impact Statements (EIS) have been not forwarded to the National Monuments Service heretofore. However this oversight has been corrected. It is noted that the proposed extraction works include milling and extraction activities over WM002-038 Road Class I Togher and WM002-039 Road Class Togher 1, two monuments included in Sites and Monuments Record for County Westmeath. These monuments are not included in the Record of Monument and Places.

WM002-038 : Discovered in 2005 and investigated in September 2006, it was found to consist of a substantial togher orientated WNW-ESE that ran across industrial peatland from the Inny River on the W to an area of higher ground to the E. The recorded length of the trackway was 657m, but it was seen to extend beyond both limits. The trackway was investigated in a single cutting and 43 sightings of the trackway in drainage ditches were also recorded. The excavation exposed a structure composed of tightly packed transversely-laid oak planks, most of which had been mortised and fixed in place with roundwood pegs. The planks measured up to 4.4m in length, 0.3m in width and 0.06m in thickness. The substructure consisted of light brushwoods, plank fragments and wood chips which were scattered across the surface of the bog. Some of these elements had been arranged into three roughly longitudinal lines of brushwoods. A radio-carbon determination from the superstructure provided a date of 1200–820 bc (Whitaker and Leahy 2007; Whitaker 2009). A second trackway was discovered to the east immediately alongside it (WM002-039----). www.archaeology.ie

WM002-039: Discovered in 2006 in the course of excavating a togher in Mayne bog (WM002-038--). It was recorded at the same level as the excavated section of the togher and was oriented E-W.

It was composed mainly of longitudinally placed brushwoods and varies in width from 1.3m to 2.9m and had an overall length of 383m. (www.archaeology.ie).

It is also noted that an assessment of the implications of development on the Cultural Heritage and Archaeology by Maurice Hurley Consultant, Archaeologist and Mr. Hurley's report has been included as Appendix 8 in the EIS. While the Environmental Impact Assessment (EIA) refers to the presence of a single "trackway" or togher (WM002-038) it does not refer to WM002-039, togher which was identified during the excavation of WM002-038.

In addition to the above monuments and others recorded in the EIA, the results of recent survey work on Bord Na Móna bogs commissioned by the National Monuments Service as part of its role in relation to the identification and protection of archaeological monuments include the discovery of two stray finds, a chert arrowhead (07E0907:1 find number) and another piece of struck chert (07E0907:2) in Coolnagun Bog (Rohan, Nicola 2009, *Peatland Survey 2007 and 2008 Blackwater, Derryfadda, Coolngaun, Mountdillon Group of Bogs Counties Offaly, Galway, Longford, Westmeath and Roscommon*, unpublished). Contrary to the opinion provided in the EIS there is a potential for the recovery of pre-peat habitation layers/artefacts, even in peat harvesting. The discovery of the important Early Mesolithic habitation site at Broughal, in Boora during the late 1970's was as a result of lake drainage and peat harvesting activities.

The underlying topography varies considerably in these bogs and occupation at lake edges – particularly on the interface between mineral soils and fen peats which formed over ground-fed waters, is very likely. The presence of early prehistoric populations is widely demonstrated in the area along the River Inny and at Lake Derravaragh at a number of locations. The discovery of the important Early Mesolithic habitation site at Broughal, in Boora during the late 1970's was as a result of lake drainage and peat harvesting activities.

At a neighbouring bog (in Corallana townland) directly northwest of Mayne Bog, a prehistoric site – lithic scatter (WM002-035) was discovered during peat extraction. *This lithic scatter was discovered after peat extraction in 1999. It is characterised by a lithic assemblage (282 pieces) comprised almost exclusively of chert (270 pieces), two axes, some coarse stone tools and a small range of organic finds including uncarbonised hazelnut shells. The assemblage focused on the production of blades and flakes with a slight dominance of blade cores being present. Three radiocarbon dates from hazelnut shells were obtained though these are not demonstrably associated with the lithics. Combining the three provides a date of 5470-5400 cal. BC (19.7%) or 5390-5300 cal. BC (75.7%) which are in keeping with late Mesolithic stone-tool technology. Although the assemblage is derived from a surface collection, and suffers from some of the problems associated with this, the site at Corralanna offers a significant contribution to our understanding of Mesolithic settlement in the Midlands, an area rich in Mesolithic archaeology. (Warren, Little and Stanley 2009)(www.archaeology.ie)*

The EIS recommends that a programme of dendrochronological dating be carried out on WM002-038 and that archaeological monitoring of existing peat harvesting activities in the area of WM 002-038 be carried out as mitigation of peat harvesting activities.

According to the Departmental policy;

"3.7.3 Conditions which should apply to archaeological monitoring

(q) General

If a development is to be archaeologically monitored then the conditions of approval or authorization for that development should provide for situations in which elements of the archaeological heritage are uncovered. There should be requirements for the stopping (on the advice of the monitoring archaeologist) of all works which might affect elements of the archaeological heritage, the recording of exposed archaeological material and preservation by record or preservation in situ of the elements of the archaeological heritage as appropriate.

Furthermore there needs to be a sufficient number of archaeologists present at all times in the course of relevant development works as specified above and located in such a manner with in the area where works are being carried out, so as to ensure that the aim of the monitoring can be achieved. (Framework and Principles for the Protection of the Archaeological Heritage, DAHGI, 1999, p28-29)"

As in many such instances where the drain faces run along the longest orientation of the bog, from north to south, the shortest distance (from east to west) is the preferred direction for toghers which crossing at the shortest distance. This is reflected at the monuments in Mayne where the toghers run from West North West- East South East.

In practice, it is not feasible to conduct monitoring as described above in circumstances where the harvesting season is continuous over the entire bog during the those periods of harvesting. As with harvesting, conditions for excavation are not ideal for much of the autumn, winter and early spring periods. To this end the National Monuments Service and the National Museum of Ireland (along with Bord Na Móna) have developed an alternative approaches as described in Code of Practice between the Department of Arts, Heritage and the Gaeltacht, the National Museum of Ireland and Bord Na Móna in relation to peat extraction activities in BNM bogs. In this process a series of excavations are undertaken over a period of time, usually when access to the sites is optimal in terms of excavation work, to make a record of monuments taking account of site vulnerability, the priorities for preservation by record along with peat production targets and contractual obligations of the developer. Provisions for excavation of portions of a linear monument without the need to take the entire field out of production are regularly agreed.

With consideration of the current comparable practice for in relation to peat extraction in other circumstances this Department make the following recommendation which should be included as conditions within the EPA determination to provide for the preservation by record and preservation *in-situ* of these important archaeological monuments.

Recommendation

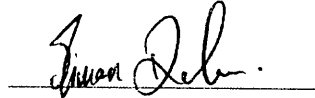
1. To provide for the preservation *in situ* of both toghers WM002-038 and WM002-039 which have been identified in the peat face of the high bog to the east of the development site at Mayne there should be no peat harvesting of the high bog nor should the drains directly beside the high bog for a length of 50m either side of the toghers be cleaned or re-excavated.
2. Prior to the re-commencement of peat harvesting or at an agreed time thereafter (in consultation with the National Monuments Service) a number of cuttings (not less than 3 per monument) shall be excavated of a sufficient width and length across WM002-039 and WM002-38 to provide a full record at these locations of these monuments and any associated monuments/archaeological objects. The excavations shall be licensed under the National Monuments Acts 1930–2004. These excavations should provide for detailed archaeological investigations and associated post-excavation analysis (including palaeoenvironmental assessments, scientific dating processes and reporting of same to include publication). The scope and detail of paleoenvironmental work will be agreed with the National Monument Service as part of the licensing process.
3. A copy of the preliminary and final excavation reports shall be provided to the EPA and to the Planning Authority.

On the basis of the results of these investigations the National Monuments Service may have further recommendations in relation to the preservation *in situ* or by record of material of archaeological significance on the site of the proposed extraction works into the future as these works will incrementally reduce the surface of the bog with the potential to expose additional archaeological monuments.

The acknowledgement to this letter, any further information and the planning authority's decision should ideally be sent to manager.dau@ahg.gov.ie; if this is not possible, correspondence may alternatively be sent to:

The Manager
Development Applications Unit
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Is mise, le meas



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