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Galway  
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By email to: [planning@galwaycoco.ie](mailto:planning@galwaycoco.ie)

28th October 2020

**Re: 201384 Athenry - permission sought for a development consisting of 1) construction of 92 no residential units consisting of 8 no 1 bed apartments, 34 no 2 bed apartments, 11 no 3 bed apartments, 21 no 3 bed duplex apartments, 13 no 3 bed terraced houses, 5 no 4 bed terraced houses, 2) provision of 3,979 sqm of commercial floorspace and all associated ancillary and storage space**

Sir/Madam,

The Heritage Council is a prescribed body under S.I. No. 600/2001 Planning and Development Regulations, section 28 inter alia.

A recent application for a large retail and residential development in Athenry has come to our attention.

Athenry is a founding member of the Heritage Council's Irish Walled Towns Network (IWTN) and since 2007 the Heritage Council, through the IWTN, has provided €710,000 for the conservation, interpretation and celebration of Athenry's town walls. Nationally, we have provided over €7 million to conserve, protect and promote walled towns across Ireland. By working in partnership with Galway County Council this funding has enabled conservation works to the northwest, southeast, and north gate of the walled town circuit. A range of public awareness events have also been supported.

In 2008, Galway County Council and the Heritage Council commissioned a Conservation and Management Plan for Athenry. *This stated that 'Athenry is one of the largest walled towns and the most complete medieval town in Ireland'*. The conservation plan went on to state that the *'extent and degree of survival of the Town Walls give Athenry the accolade of one of the most complete walled towns in Ireland. In terms of land area within the Walls (28 hectares), it is also one of the largest walled towns. Both these points would suggest that the Walls are of national significance'* (Gifford 2008, 53, 60).

We would also draw attention to the provisions of *National Policy on Town Defences, 2008*, which makes the following important declaration:

Baill na Comhairle | Council Members

Michael Parsons  
Cathaoirleach | Chairman

Dr. Marie Bourke  
Kieran Coughlan  
Miriam Fitzpatrick  
Mary Gallagher  
Sinéad McCartan  
Jane Maxwell  
Fionnuala May  
Prof. Muiris O'Sullivan  
Ivor McElveen  
Brian Walsh

*“The known and expected circuits of the defences (both upstanding and buried, whether of stone or embankment construction) and associated features of all town defences are to be considered a single national monument and treated as a unit for policy and management purposes. There should be a presumption in favour of preservation in-situ of archaeological remains and preservation of their character, setting and amenity.”*

We note that the Athenry Local Area Plan 2012-18 states: *‘Of particular importance are the town walls and flanking towers which are of international importance’ (section 3.8.1).*

The walled circuit is protected under the National Monuments Act 1930-2014 (GA084-001001-) and can be considered as a National Monument. Approximately 70 linear metres of town wall are located close to this particular application.

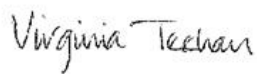
As such, any development on the scale proposed within the walled town and in close proximity to the walls requires careful consideration. We note the set back area or ‘buffer zone’ close to the town wall.

The Architectural Heritage Impact Assessment (John Cronin and Associates 2020, p10) mentions an ‘archaeological impact assessment’ but we have not been able to locate this on the planning file available online. As such it is difficult to assess the impact on sub-surface archaeology.

We are of the view that supporting visual impressions (drawings/CAD imagery) should be provided to assess the impact of the proposed development as it relates to the town walls.

Greater clarity is also required on the impact of the proposed development on archaeological deposits, on the setting of the town walls and how the developers propose to safeguard their integrity during construction (i.e. the location of storage areas, machinery etc). Should the development proceed, a plan for the landscaping, planting, and interpretation of the portion of wall located within the development site should also be supplied. If granted, consideration should also be given to a condition requiring detailed recording and conservation (with specialist supervision) of the portion of walls within the development zone. Such a methodology should be agreed with the Galway County Council Heritage Officer and Conservation Officer.

Yours sincerely,



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Virginia Teehan  
Chief Executive  
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