



Planning Department  
Wexford County Council  
County Hall  
Carricklawn,  
Wexford

14<sup>th</sup> August 2020

**Re: Planning application 20200700 Templeshannon and Clonhasten, Enniscorthy**

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 ninety-seven residential units and a ninety-bed nursing home in the townlands of Templeshannon and Clonhasten, Enniscorthy, has come to our attention. We do not have any record of this application being notified to the Heritage Council as a prescribed statutory body. We note that the deadline for submissions passed on the 3<sup>rd</sup> August last.

We note that the site of the proposed development is zoned 'New residential/low-medium density' under Variation No. 2 to the Enniscorthy Town & Environs Development Plan 2008-2014 (as extended). We note the proximity of the National Monument on Vinegar Hill (National Monument no. 392) and RMP WX020-118 'Battlefield', the latter designated monument is in close proximity to the proposed development. The applicant's Application form A does not acknowledge this.

We note Wexford County Development Plan 2013-19 **Objective AH01** '*To conserve and protect archaeological sites, monuments (including their settings), underwater archaeology and objects within the jurisdiction of Wexford County Council including those listed on the Record of Monuments and Places, the Register of Historic Monuments or newly discovered sub-surface archaeological remains*' and **Objective AH02** '*To protect the heritage of groups of important national monuments, inclusive of their contextual setting and interpretation, in the operation of development management*' and **Objective AH06** '*To protect historic and archaeological landscapes, including battlefields, and promote access to such sites provided that this does not threaten the feature.*'

We note the archaeological assessment supplied as part of the planning application. This references the 2008 Department of Environment, Heritage and Local Government/National Monuments Service commissioned *Battlefields project* assessment of Vinegar Hill. This project and recent survey work carried out under *The Battle of Vinegar Hill Research Project* (an initiative of Wexford County Council) has also furthered understanding of the 1798 battlefield through recovery and analysis of artefactual material from the plough soil associated with the conflict.

We comment as follows:

The urban location of Vinegar Hill means that the battlefield is accessible to the public, but its significance is enhanced due to its integrity, i.e. a lack of development has retained its legibility in comparison to other urban battlefields such as Kinsale, Co Cork.

Both of the projects mentioned above (2008 Department of Environment, Heritage and Local Government/National Monuments Service commissioned *Battlefields project* and *The Battle of Vinegar Hill Research Project*) have demonstrated that the footprint of the battlefield extends throughout the fields on Vinegar Hill, and that modern archaeological techniques can analyse these remains to present a new understanding and interpretation of events. As such, development in this area needs careful consideration so as not to damage the legibility and integrity of this nationally significant battlefield. By way of example, the change from open field to residential by the proposed development will intrude on the line of advance of government forces during the battle of Vinegar Hill. This would constitute a material change to the setting and integrity of the battlefield and will affect opportunities for its presentation and interpretation.

We draw your attention to the Objective AH01 which refers to the setting of archaeological sites and to AH02 which refers to 'contextual setting and interpretation'. With reference to this application we note the absence of detailed photomontages of the proposed development, in particular as viewed from the National Monument on the summit of the Hill.

We have not identified in existing Wexford County Council planning policy any detailed content on protected views or landscape sensitivity relating to Vinegar Hill and this is a gap in terms of its protective framework. We would hope these gaps will be addressed in the emerging County Development Plan and future local plans for Enniscorthy. As such this application may be premature.

We also submit that the zoning of the area occupied by the proposed development as residential maybe incompatible with the preservation of the setting and integrity of this battlefield, in particular in the light of recent analysis mentioned above.

We note the recently announced Sherwood & Associates Enniscorthy Tourism Plan (August 2020) which identifies the heritage and natural assets of the town as key resources, including Vinegar Hill.

We understand the Wexford County Council has recently advertised for a Heritage Officer. This is a very positive development and we look forward to working with the successful candidate; the devising of a management plan for this important battlefield site would be one key project.

We urge you to add these comments to the planning file. While acknowledging the need for elderly care centres and residential units, we are of the view that the impact this development would have on the battlefield would be extremely negative and would impact on the future amenity and tourism potential of Vinegar Hill.

Yours sincerely

A handwritten signature in black ink that reads "Ian Doyle". The signature is written in a cursive style with a large initial 'I'.

Ian Doyle  
Head of Conservation,