



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

Archaeology, Conservation & Heritage,
Planning & Property Development Department,
Block 3, Floor 3, Civic Offices, Wood Quay, Dublin 8.

Seandálaíocht, Caomhantas & Oidhreacht
Roinn Pleanála & Forbairt Maoine
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8.

Archaeology Section Report

To: Area Planner; John Bergin

Re: SHD0009/22- White Heather Industrial Estate, South Circular Road, & 307/307a South Circular Road, and 12a St James's Terrace, Dublin 8. (ABP-313278-22)

Date: 18.05.22

Proposal: The development will consist of:

- 1) The demolition of all existing buildings on site except 307/307a South Circular Road including industrial storage warehouses and office buildings comprising a total of c. 6,604 sq. m. floorspace;
- 2) A mixed residential and commercial development with a total floorspace of c. 30,242 sq. m. Total proposed residential floorspace is c. 26,119 sq. m. and consists of a total of 335 no. Build to Rent residential units over 7 Blocks (5-10 storeys) and a terrace of 7 no. 3-storey 3 bed townhouses.

1. Commentary

Statutory Protection

The site is located approximately 40m to the south of the zone of archaeological potential (ZAP) for Recorded Monument and Place (RMP) DU018-030 (Historic City). The Record of Monuments and Places (RMP) consists of a published county-by-county set of Ordnance Survey maps, on which monuments and places are marked, and an accompanying book for each county listing the monuments and places. The RMP zone is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994.

It is the policy of the Dublin City Development Plan 2016-22 (Section 11.1.5.15 CHC9) to protect and preserve monuments:

1. To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of the re-use of buildings, light buildings, foundation design or the omission of basements in the Zones of Archaeological Interest.
2. That where preservation in situ is not feasible, sites of archaeological interest shall be subject to 'preservation by record' according to best practice in advance of redevelopment.

Review of Documents Submitted

The submitted documentation has been reviewed by Dublin City Council Archaeology Section. Chapter 17 of the submitted EIAR, written by archaeologist Faith Bailey, of IAC Ltd., discusses the archaeological impact of the proposed development. This report shows that the ZAP for the city watercourse (DU018-043002 - a re-routed 13th century water supply) is located c. 75m to the southwest of the proposed development area. The ZAPs for two further watercourses, DU018-020576 and DU018-020692, are located c. 58m to the north and c. 195m to the north of the site respectively.

The reports shows that the site is situated on the northern bank of the Grand Canal, which forms its southern boundary. The Ordnance Survey 6" historical map (1837-1842) shows an inlet from the canal at the southeast corner of the site (Figure 1). This inlet led to two basins / canal docks, located on the central and eastern portions of the subject site. These canal docks were filled in during the 19th century and are listed on the Dublin City Industrial Heritage Record (DCIHR Ref: 18_14_006), which states that 'A dock was built on this site (presumably as part of the 'Circular Line' development of the Grand Canal

in the late eighteenth century or early nineteenth century) but appears to have been filled in. Although no remains of the dock are visible, the site has Archaeological/Industrial Heritage potential as there is a strong possibility that remains of the docks survive below ground level (www.heritagemaps.ie/WebApps/DublinCountyHeritage/index.html).



Figure 1 Ordnance Survey 1st Edition (1843). Approximate location of site in red

The White Heather Laundry was later constructed within the site boundary in the early 20th century and two of its buildings are recorded by the DCIHR (Nos. 18_14_008_01 and 18_14_009_01), but neither structure remain present today.

When discussing potential impacts on subsurface archaeological material the EIAR states that 'No remains of the canal docks are extant, although it is highly likely that remains survive beneath the surface, following the backfilling of the features. The docks are likely to be in the region of 3m deep and defined by masonry revetting walls, it remains probable that the backfilled post-medieval canal docks survive beneath the current ground level. It is possible that ground disturbances associated with the development may have a direct negative significant impact on these remains' (pp 17-23).

Construction phase archaeological mitigation measures are discussed in Section 17.6.1 of the submitted EIAR. These comprise a programme of test trenching at the site following demolition and clearance of the standing buildings. The testing will investigate the potential for survival of any remains associated with the former 19th century canal docks and the 20th century laundry remains, as well as any earlier features that may survive on the site. The report recommends that all ground disturbances, including site investigations, associated with the proposed development should be monitored by a suitably qualified archaeologist.

Discussion

As demonstrated by the baseline research presented in the EIAR, the proposed site is one of high industrial archaeological potential. The subsurface survival of the 18th century canal docks in particular is a strong possibility. The docks in question are part of the infrastructure of the Grand Canal, one of the most visible pieces of industrial heritage in Dublin city. In its appraisal of the Grand Canal the DCIHR states that 'The circular line of the Grand Canal was built by the Grand Canal Company between 1790-96 and constitutes one of the major civil engineering achievements of the eighteenth-century. It remains one of Ireland's most important and widely known industrial heritage sites, and was hugely influential in

the development of further industry in the country through the transport links it facilitated' ([www.https://heritagemaps.ie/WebApps/DublinCountyHeritage/index.html](https://heritagemaps.ie/WebApps/DublinCountyHeritage/index.html)).

Recent excavations at Grand Canal Harbour (Licence Number: 17E0525) have revealed a largely intact 18th-century harbour, which was removed *in toto* to accommodate a new development at the site (Planning Reference 3855/09). It is likely that the docks within the red line boundary of the proposed scheme will survive below the ground in a similarly intact state. The mitigation for the development proposal at the subject site would remove the docks at South Circular Road. Their proposed removal will add to the rapid accumulation of loss of significant industrial heritage relating to the Grand Canal. Furthermore, archaeological monitoring of construction as proposed may not result in a full archaeological record (preservation by record).

Should the assessment (by way of test excavation) demonstrate that these docks survive *in toto* or in part at subsurface level within the site, the preferred option of this office is preservation *in situ* by way of redesign (e.g. curtailing basements or judicious use of low density piling), along with presentation of suitable elements within the proposed scheme. This is in accordance with the *Framework and Principles for the Protection of the Archaeological Heritage* (1999, Dept. Housing, Local Government and Heritage), which states that 'preservation in situ must always be the first option to be considered rather than preservation by record in order to allow development to proceed, and preservation in-situ must also be presumed to be the preferred option' (p34).

The construction of Blocks 3, 4 & 7 on the eastern side of the site are most likely to impact on any surviving dock infrastructure/walls (Figure 2). As there is no proposed basement in block 4 & 7, there is scope for the retention and presentation of such features here by way of ground floor and foundation design and landscaping. The design should therefore be developed in light of information provided by a programme of archaeological testing and excavation, the aim of which is to provide information about the survival, the exact location and nature of dock features.



Figure 2 Proposed development layout, with approximate location of 18th-century canal docks in red

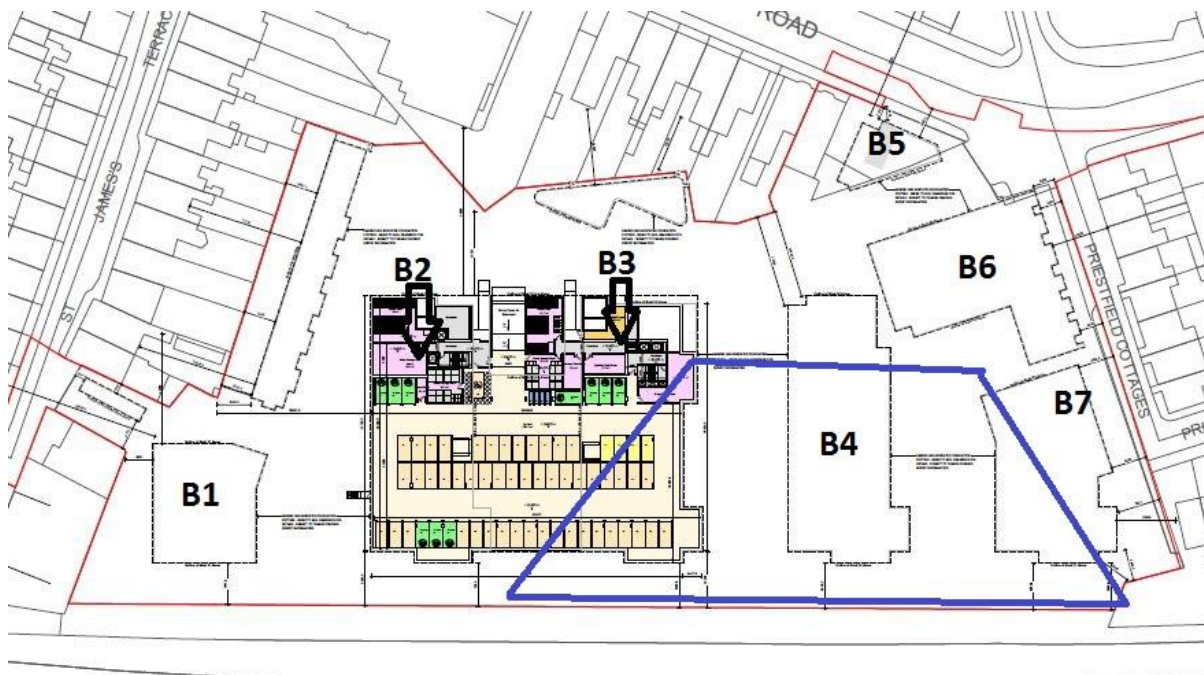


Figure 3. Basement Plan with blue line showing likely area of docks

Summary

It is the recommendation of this office that the following archaeological strategy be applied to the site.

1. Archaeological Monitoring of demolitions and Site Investigation works.
2. Archaeological Test Excavation to establish the location, nature and extent of subsurface archaeology and Industrial Heritage features to inform an excavation strategy
3. Open area archaeological excavation to expose and record any surviving features in advance of the main construction contract.
4. Preservation in situ and presentation of the docks /other suitable features in the design of the proposed development.

2. Recommendations

In the event of a Grant of Permission, it is the Archaeology Section's recommendation that the following condition be applied.

1. Licenced Archaeological Monitoring of demolitions and pre construction Site Investigation works. A report containing the findings of the pre development monitoring shall be submitted to the Planning authority.
2. A predevelopment licenced archaeological assessment and test excavation, as outlined in Section 3.6 of the *Framework and Principles for the protection of the archaeological heritage* (1999). A report containing the assessment and detailed impact statement shall be submitted to the Planning authority. Where archaeological material is found to be present in the archaeological testing, an archaeological excavation strategy, including preservation in situ and presentation of features shall be agreed in writing with the planning authority.
3. The site shall be subject to a full pre development archaeological excavation and post excavation prior to the commencements of the main contract. Bi weekly briefing notes, preliminary and final excavation reports shall be submitted to the planning authority.
4. Where significant remains of the 18th century canal docks or other features of significance are found to survive at subsurface level, these features shall preserved in situ by way of redesign and presented with appropriate interpretation in the proposed scheme, the details of which shall be agreed with the planning authority.

Reason

In the interest of preserving or preserving in situ/by record archaeological material likely to be damaged or destroyed in the course of development.

Signed

A handwritten signature in black ink, appearing to read 'Niall Colfer'.

Dr Niall Colfer Assistant City Archaeologist

A handwritten signature in black ink, appearing to read 'Ruth Johnson'.

Dr Ruth Johnson City Archaeologist

Cc Planner; Planning Registry; Development Applications Unit, National Monuments Service, Dept. of Housing, Local Government and Heritage, FAO Tom Condit