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ÆGIS REF.: 758-01

Archaeological, Architectural and Cultural Heritage Impact Assessment for a Strategic Housing Development (SHD) at lands at the former Greenpark Racecourse, Limerick City



ÆGIS ARCHAEOLOGY LIMITED
32 Nicholas Street King's Island
Limerick V94 V6F7
086 8293220
info@aegisarc.com
www.aegisarchaeology.com

Report Author: F. Coyne BA MIAI

Client: Voyage Property Limited

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Copies of this report have been presented by ÆGIS to:

Client— Tom Phillips + Associates
Town Planning Consultants

Please note...

That the archaeological recommendations, mitigation proposals and suggested methodology followed in this report are similar to those used on previous similar projects approved by the Archaeological Planning and Licencing Unit National Monuments Service, Room G50, Custom House, Dublin 1 The National Monuments Acts 1930–2014, The Planning and Development Act 2000 (plus any amendments) and the most recent EPA guidelines were consulted. Guidelines and plans issued from time-to-time by the statutory and regulatory bodies have been consulted. These are listed in the reference section of this report.

This report takes into account the particular instructions and requirements of the client. Every effort has been taken in the preparation and submission of this report to provide as complete an assessment as possible within the terms of the brief, and all statements and opinions are offered in good faith. However, ÆGIS cannot accept responsibility for errors of fact or opinion resulting from the data supplied by any third party, for any loss or other consequences arising from decisions made or actions taken on the basis of facts and opinions expressed in this report (and any supplementary information), howsoever such facts and opinions may have been derived, or as the result of unknown and undiscovered sites or artefacts.

COVID-19
Information

A site inspection was undertaken as part of essential works and necessary COVID-19 mitigation strategies were followed.

Acknowledgements

ÆGIS acknowledges the information supplied by the client, the client's agents and information gathered from the Archaeological Survey of Ireland.

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Cover Image

View across old racetrack, from southwest (image taken by F. Coyne).

Contents

	<i>page</i>
I. List of Figures, Plates and Tables	4
II. Glossary of Terms	5
1. Scope of Study	6
2. Method of Study	7
3. Existing Environment	8
3.1 Proposed development	10
3.2 The site inspection	12
4. History and Wider Cultural Heritage of the Site and Vicinity	16
4.1 Historical outline	16
4.2 Archaeology	19
4.2.1 Previous archaeological work	22
4.2.2 Artefact and wreck finds	23
4.3 Cartographic images of the subject site	24
4.4 Protected structures and historic architecture	27
4.5 Social history and folklore: Intangible cultural heritage	28
5. Impact of Proposed Development	30
5.1 The 'do-nothing' impacts	30
5.2 The predicted impacts	30
5.3 The 'worst case' scenario	31
5.4 Interaction of impacts	31
6. Conclusions & Suggested Mitigation	32
7. Non-Technical Summary	35
8. Signing-Off Statement	37
9. Project References	38
Annexes	
1. Legislation and regulation protecting the archaeological and architectural heritage resource	40
2. Development plan and other plans' cultural heritage policies	47
3. Guidance documentation	52
4. Assessment of impact type and magnitude	53

I. List of Figures, Plates and Tables

FIGURES	<i>page</i>
3.1. General site location of subject site in relation to Limerick City (after www.archaeology.ie). North to top.	8
3.2. Detailed location of subject site. North to top.	9
3.3. Detailed location of subject site, showing streets and adjacent landmarks. North to top.	9
3.4. Proposed development layout at the former Greenpark Racecourse, Limerick.	11
4.1. RMP map extract, Limerick sheet 5 (ASI 1997) on 1938 edition six-inch OS map. Subject site indicated in red.	19
4.2. Subject site outlined in red (ASI www.archaeology.ie). Closest archaeological monuments labelled in red.	20
4.3. Digital Globe aerial photography extract (ASI www.archaeology.ie). Subject site outlined in red. North to top.	20
4.4. Extract of seventeenth-century Down Survey county mapping for Co. Limerick; parish of St Michael's.	24
4.5. Subject site in red on OS first edition (c. 1840) 6-inch map (after www.archaeology.ie). North to top.	25
4.6. Subject site in red on 25-inch OS map (after www.archaeology.ie). North to top.	25
4.7. Plots in Griffith's Valuation dated c. 1853. North to top. Subject site corresponds with portions of plots 2 and 3.	26
4.8. US President Kennedy addresses the crowd at Greenpark Racecourse, 29 June 1963 Limerick.	28
4.9. Preparations at Green Park for visit of President J.F. Kennedy to Limerick in 1963.	28
4.10. John Treacy winning the World Cross Country title at Greenpark Racecourse, Limerick on 25 March 1979.	29
4.11. Pope John Paul II at Greenpark Racecourse, Limerick, 1 October 1979.	29
6.1. Google Earth image 5 April 2006.	32
6.2. Google Earth image 5 April 2006. Suggested area for archaeological monitoring mitigation.	34
PLATES	
1. Proposed route of access road, from N.	13
2. View across southern portion of SHD, from NW.	13
3. Concrete in general location of racecourse grandstand area, from SE.	14
4. View along old racetrack, from E.	14
5. View from E showing difference in height from filled area on the right (S), and racetrack on the left (N).	15
6. View across old racetrack towards northern side of proposed site, from S.	15
TABLES	
4.1. Known archaeological monuments in the vicinity of the subject site.	21
4.2. Summary of licenced archaeological work undertaken in the vicinity of proposed development.	22
4.3. Known architectural monuments in the vicinity of the subject site.	27
5.1. Predicted impacts of proposed development on the cultural heritage resource.	31
6.1. Suggested archaeological mitigation measures.	33

II. Glossary of Terms

ASI	Archaeological Survey of Ireland, a division of the DHLGH.
Barony, Parish, Townland	These terms refer to land divisions in Ireland. The barony is the largest land division in a county, which is formed from a number of parishes. These parishes are in turn made up of several townlands, which are the smallest land division in the country. The origins of these divisions are believed to be in the Early Medieval/Christian period (AD500-AD1000), or may date earlier in the Iron Age (500BC-AD500).
DHLGH	Department of Housing, Local Government and Heritage.
E	East.
First Edition	This relates to editions of the OS 6-inch maps for each county. The first edition map completed for the area dates to the early 1840s and this is referred to in the text as the 'First Edition'.
ITM	Irish Transverse Mercator (grid reference type favoured by ASI).
KM	Kilometre.
L2030	Limerick Twenty Thirty DAC.
LCCC	Limerick City and County Council.
M	Metres, all dimensions are given in metres or part of a metre, unless otherwise stated.
N	North.
NGR	National Grid Reference.
NIAH	National Inventory of Architectural Heritage.
NLI	National Library of Ireland.
NMI	National Museum of Ireland.
NMS	National Monuments Service. Regulatory body and division of the DHLGH.
OS	Ordnance Survey.
OSI	Ordnance Survey of Ireland.
RMP	Record of Monuments and Places. An update of the older SMR, (sites and monuments record), on which all known archaeological sites are marked and listed in an accompanying list. The sites marked afford legal protection under the National Monuments Acts 1930-2004. The record is based on the 6-inch map series for the country and is recorded on a county basis. Each archaeological monument on the RMP has a unique code known as the RMP number and is prefixed by the county code, for example KE for Kerry or LI for Limerick.
RMP Number	This code is the number of the site on the RMP constraint map. It begins with the county code, the 6-inch sheet number, followed by the number of the archaeological monument on that sheet.
RPS	Record of Protected Structures.
S	South.
SHD	Strategic Housing Development.
Sheet	This relates to the 6-inch map for each county, which is divided into sheets.
SMR	Sites and Monuments Record. The precursor of the RMP, the SMR now commonly relates to the archive paper files of known archaeological monuments maintained by the Archaeological Survey of Ireland (ASI). These files are arranged according to SMR number. Much of this information is now available online at www.webgis.archaeology.ie/historicenvironment/ .
TB	Townland Boundary.
W	West, or when used with a dimension, width.

1. Scope of Study

This report identifies and assesses the potential direct and indirect impact(s), if any, on the potential archaeological, architectural and cultural heritage environment of the subject site. The subject site comprises lands of the former Greenpark Racecourse. The subject site is situated in the townland of Ballinacurra (Hart), the barony of Pubblebrien and the civil parish of Saint Michael's (<https://www.logainm.ie/30589.aspx>). The northernmost part of the existing access road from the Dock Road is situated in the adjacent townland of Corkanree.

This report fulfils the requirement of an archaeological architectural and cultural heritage impact assessment and fulfils the usual criteria of an impact assessment following the most recent EPA guidelines on the compilation of an EIS and EIAR (2017; 2018). Pertinent guidelines published from time-to-time have also been consulted and are listed in the project references given at the back of this report. **Section 2** outlines the methods used in this assessment. **Section 3** describes the existing environment of the subject site, provides a description of the proposed development and records the site inspection carried out as part of this assessment. **Section 4** provides background heritage context for the subject site. A brief historical introduction to the area is provided and archaeological and architectural features in the vicinity, including any standing remains, are discussed. Social history and folklore associated with the site is addressed in this section. **Section 5** lists the known archaeology and historic architecture and the potential for archaeology and architectural features on the site and in its vicinity and discusses impacts, (if any), of development on that cultural heritage. **Section 6** provides a summary and suggests mitigation measures to alleviate negative predicted impacts listed in section 5. **Section 7** provides a summary in lay person's language of the more technical detail of the report. The report concludes with a signing-off statement (**section 8**); list of references used (**section 9**), and supporting information as annexes.

A site inspection was carried out as part of this assessment and necessary COVID-19 mitigation strategies were followed.

2. Method of Study

The following resources and methods of establishing the archaeological status of the site were used:

- A review of the previous site reports undertaken to date was undertaken;
- The Record of Monuments and Places constraint maps and lists (RMP) and the sites and monuments record (SMR) were consulted;
- A wide range of local historical and archaeological records relevant to the study area were consulted, including but not limited to the Ordnance Survey First Edition six-inch map (c.1840), the Ordnance Survey twenty-five-inch map, and various aerial views;
- The archaeological, architectural and cultural heritage policies in the County Development Plan and other pertinent plans were considered (annexes 1 and 2);
- The National Inventory of Architectural Heritage (NIAH) and the Record of Protected Structures for Limerick City were consulted;
- Folklore collections were consulted for records of intangible cultural heritage relating to the subject site;
- Artefact records on heritage mapping, Limerick City Museum catalogue, and the Irish Antiquities Division of the National Museum of Ireland ‘topographical files’ were consulted;
- A review of any archaeological investigations on or in the vicinity of the subject site was undertaken;
- A site inspection was undertaken.

3. Existing Environment

The subject site comprises approximately 10.5 hectares located in the townland of Ballinacurra (Hart) in Limerick City (ITM 557013, 657182). The northernmost part of the existing access road from the Dock Road is situated in the townland of Corkanree. The subject site comprises lands which were formerly part of Greenpark Racecourse (Figs 3.1-3.3). The site is bounded by a housing development to the east, undeveloped land and Ballynaclogh River to the south, open land (formerly part of the racecourse) to the north, and open ground with the greyhound track to the west.

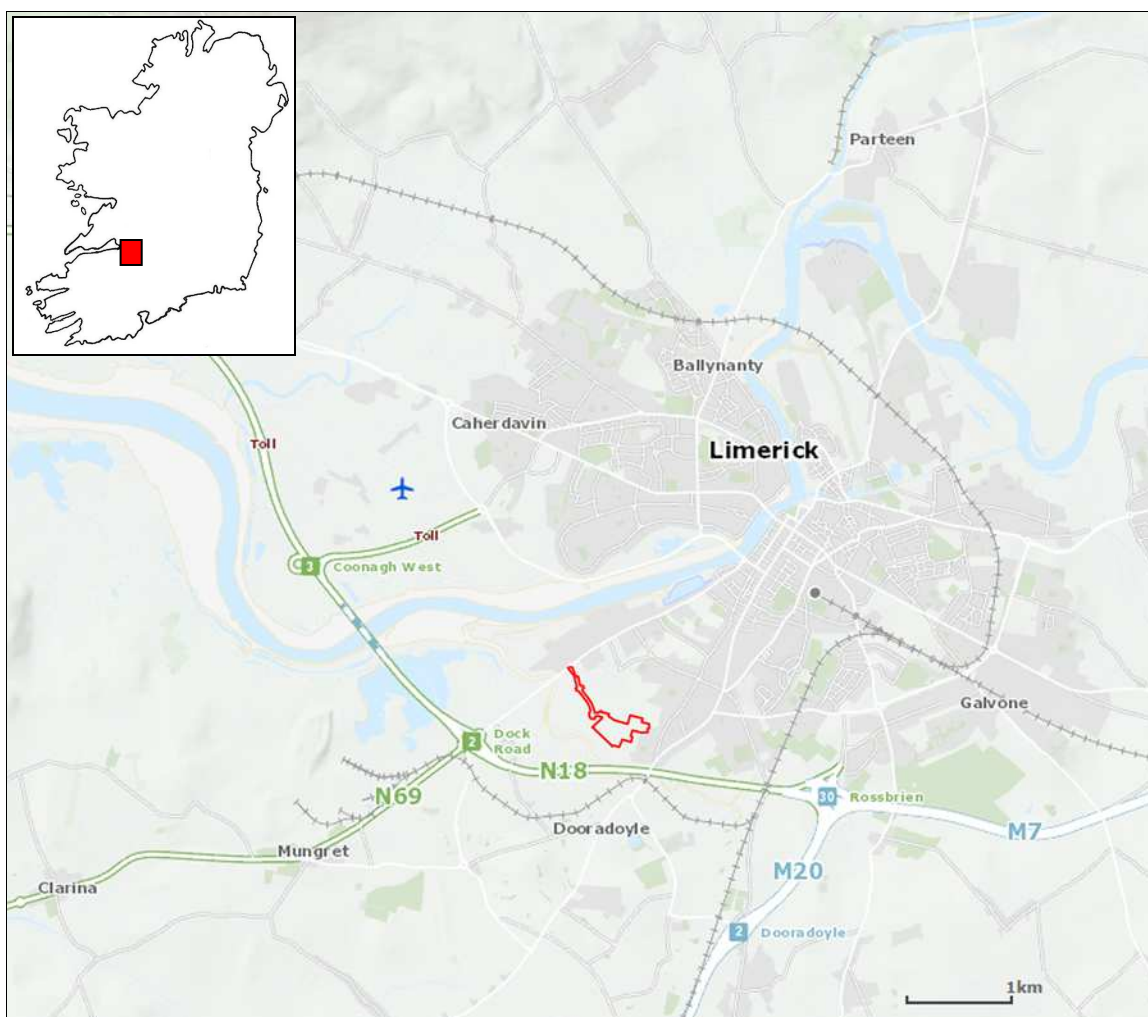


Figure 3.1. General site location of subject site in relation to Limerick City (after www.archaeology.ie). North to top.

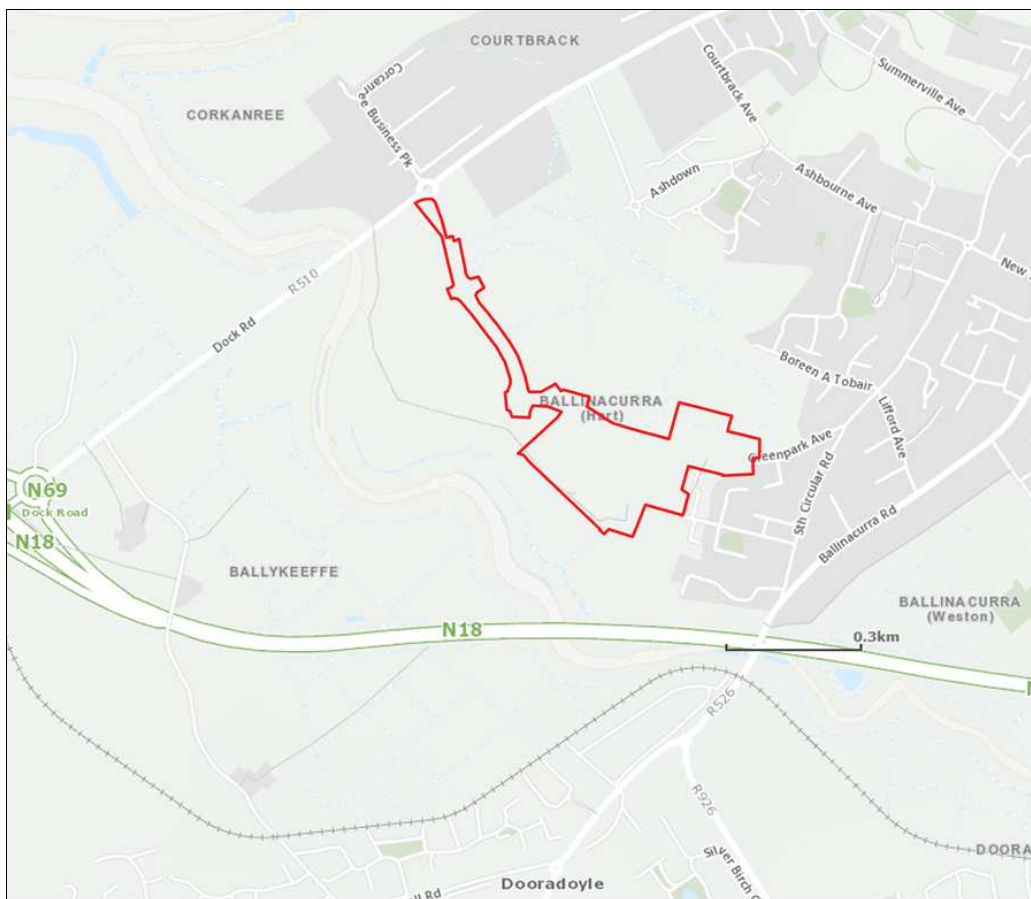


Figure 3.2. Detailed location of subject site. North to top (for indication only).



Figure 3.3. Detailed location of subject site, showing streets and adjacent landmarks. North to top (for indication only).

3.1 Proposed development (figure 3.4)

Voyage Property Limited intend to apply to An Bord Pleanála (the Board) for permission for a strategic housing development with a total application site area of c.10.5 ha (with a substantive residential site development area of c.7.9 ha), on lands at the former Greenpark Racecourse, Dock Road, Limerick, principally bounded by existing undeveloped lands to the north, south and west and the adjoining Log na gCapall Housing Estate to the east. The application site includes the proposed access road (374m in length; 6 -14m in width; a roundabout; cycle lands and pedestrian footpath) which joins into the Dock Road at the north-western corner of the former Greenpark Racecourse lands and runs adjacent to the Limerick Greyhound Track.

The development with a total gross floor area of c. 36, 329 sq m will consist of the provision of 371 no. residential units comprising 157 no. two storey houses (consisting of 10 no. 4 bedroom units, 110 no. 3 bedroom units and 37 no. 2 bedroom units); 76 no. three storey duplex units (consisting of 14 no. 3 bedroom units, 38 no. 2 bedroom units and 24 no. 1 bedroom units) and 138 no. apartments (consisting of 92 no. 2 bedroom units and 46 no. 1 bedroom units arranged in 3 no. blocks ranging between 4 and 5 storeys together with communal amenity space) and a childcare facility (550 sq m), including all private, communal and public open space provision (including balconies and terraces to be provided on to front and rear elevations and related play areas); surface car parking (510 no. spaces in total, including car sharing and accessible spaces); electric vehicle charging points; bicycle parking (long and short stay spaces including secure stands); storage areas; internal roads and pathways; hard and soft landscaping and boundary treatments; piped infrastructural services and connections; plant; revised entrances and tie-in arrangements to adjoining roads, including emergency access via Log na gCapall; waste management provision; solar panels; attenuation tank and related SUDS measures; signage; public lighting; bulk earthworks; and all site development and excavation works above and below ground. Vehicular access to the site will be from Dock Road, via the proposed access road.

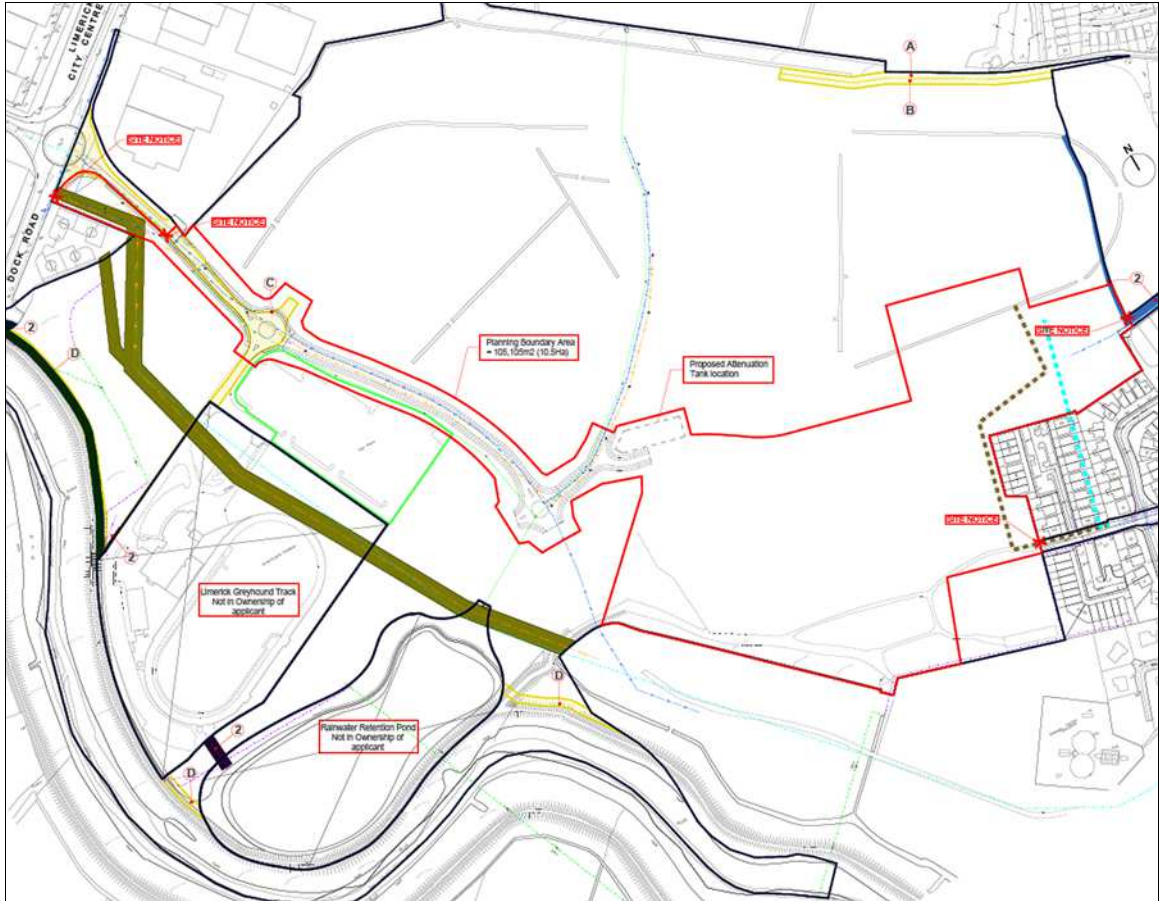


Figure 3.4. Proposed SHD development site at the former Greenpark Racecourse, Limerick. North to top (for indication only).

3.2 The site inspection (figs 3.5–3.7; plates 1–6)

The entire subject site was inspected on 8 April 2021 and COVID-19 mitigation strategies were followed. The location was first assessed through a desk-based analysis of aerial photography and maps (see below). Nothing of potential as an unrecorded (or ‘new’) feature was identified on available maps or aerial imagery. The site was inspected in dry and overcast weather conditions. Visibility was good. The subject site is accessed from the N along a filled track (Plate 1), which is also the route of the proposed access road to the Strategic Housing Development (SHD) area. The S and SW portions of the SHD area appear to have been filled in the past, as evidenced on a 2006 Google Earth image (see Fig. 6.1 below). This has raised the area to the S side of the race track by several metres in places (Plates 2 and 5). Areas of concrete are visible in the general area of the old grandstand (Plate 3) This grandstand is upstanding and visible in figures 4.8 and 4.9. These areas are covered in scrub and grass. The original racetrack is still visible and covered in a growth of short grass (Plate 4). The northern side of the proposed development incorporates part of the old race track, and marshy land beyond this to the N.

No previously unrecorded features of archaeological or cultural heritage interest were noted during the walkover.

Archaeology

The subject site is not located within any zone of notification of any recorded archaeological monuments and there are no known monuments either upstanding or subsurface within the subject site. Nothing of an archaeological nature was noted as upstanding during the walkover inspection or identified on the aerial photographs consulted. Even though no archaeological features were upstanding during the walkover, there remains the potential (albeit a relatively low potential) for unrecorded subsurface archaeological remains of any period (prehistoric; medieval; post-medieval) to be present. This is because of the subject site’s general proximity to the River Shannon and its tributary the Ballynaclogh River. Known archaeological monuments in the vicinity were considered during the walkover inspection. The archaeology of the vicinity of the subject site is discussed in **section 4**.

Historic Architecture

The subject site has no structures of historic significance upstanding. It was the location for several relatively recent historical events, however. These are outlined in **section 4**.



Plate 1. Proposed route of access road, from N.



Plate 2. View across southern portion of SHD, from NW.



Plate 3. Concrete in general location of racecourse grandstand area, from SE.



Plate 4. View along old racetrack, from E.



Plate 5. View from E showing difference in height from filled area on the right (S), and racetrack on the left (N).



Plate 6. View across old racetrack towards northern side of proposed site, from S.

4. History and Wider Cultural Heritage of the Site and Vicinity

4.1 Historical outline

The proposed development site is the former Limerick Racecourse at Greenpark. It is situated in the townland of Ballinacurra (Hart) and in fact takes up most of the area of that townland. The townland of Ballinacurra (Hart) is situated to the southwest of the city of Limerick and it is almost 197 acres in extent. The townland is located in the barony of Pubblebrien and the civil parish of Saint Michael's (<https://www.logainm.ie/30589.aspx>). The townland name Ballinacurra is derived from the Irish Béal Átha na Cora, translated as 'the fordmouth of the weir'. The area is known since at least the seventeenth century as is depicted on the Down Survey map of the locality (see section 4.3 below). There are several Ballinacurra townlands in this area of Limerick, for instance Ballinacurra (Weston). It is likely that when the townlands were being first recorded in writing in the 1840s, Ballinacurra was particularly large and so was divided into portions, which were named after the owners at that time.

Lewis writing in 1837 does make reference to the barony of Pubblebrien and the parish of St Michael's. However, he does not mention specifically the townland of Ballinacurra (Hart) or any other features in the general vicinity of the townland (Lewis 1837). John O'Donovan writing in the 1840s briefly mentions the townland and its divisions between the various family names (Hart, Weston etc.). Joyce (1995) records that the name of the townland comes from Beal Atha an Curragh, anglicised to Ballinacurra. He believes that the name comes from a fording (crossing) point (now Ballinacurra Bridge, Dooradoyle Road) that was used by pilgrims in medieval times to travel from Limerick to the monastic town of Mungret several miles to the south (see O'Flaherty 2010 for a history of the medieval town of Limerick). The Creek and the adjacent area were then named after this fording point (Joyce 1995, 85). It is not unusual that this townland is not mentioned specifically by either of the above commentators. While now quite close to Limerick City itself and connected to it by the Dock Road, at their time of writing the site was in a rural location in the hinterland of Limerick City. The Dock Road had not yet been built then and as such the townland was probably

only accessible by foot or by the water channel Ballinacurra Creek/Ballynaclogh River, both still extant. The Ordnance Survey (OS) first edition six-inch map dating to the early 1840s (see section 4.3 below) shows the isolated townland as being prone to flooding (it notes floods across the townland) and as such prior to drainage was probably part of the floodplain of Ballynaclogh River, which forms the southern boundary of the townland and is a tributary of the River Shannon. This map also shows, beyond the boundary of the subject site, several ‘old brick holes’ and ‘brick holes’ which indicate that clays from near Ballynaclogh River were used in the manufacture of brick from Ballinacurra (Hart). It is not known if bricks were actually manufactured on the site—no brick clamps (kilns) were indicated—but it is possible that they were; or that the clay was transported to brick works elsewhere (Hull 2008).

The townland of Ballinacurra (Hart) lay just beyond the reach of the seventeenth-century fortifications and earthworks constructed—or at least proposed at that time—around Limerick City (Hill 1991; O’Flaherty 2010). It also lay beyond the expansion of the town to the south of its medieval core into what was called Newtown Pery in the eighteenth and nineteenth centuries. With the increased wealth and prosperity of the city of Limerick and its expansion to the south and west with areas of warehousing and trade from the river, it is not surprising that along with this wealth, recreational activities were required. A racecourse was already established at Newcastle (southeast of the town in the area now known as Castletroy), but due to its poor and infamous reputation a new racecourse was established at Greenpark in the 1890s in the townland of Ballinacurra (Hart). Although not documented, the writers may deduce from the available evidence that this was likely to be the first development at the subject site at Ballinacurra (Hart). Despite the fact that Greenpark racecourse is a well-known location in Limerick comparatively little has been documented about it.

Spellissy has the most succinct history of the site, summarised here. The course at Greenpark was established to replace the one at Newcastle and the first race was run there in 1868. Maurice Lenihan writing in 1866, of the earlier course at Newcastle, said it attracted much attention, even from England and held many sporting events (Lenihan 1866). The first chairman of the Limerick Race Company established for the Greenpark racecourse in 1890. He was a member of the Barrington family, a very prestigious family at the time in Limerick, after which Barrington’s hospital was named (Varebeke 1988). Despite the fact that the races seem to have to have been moved from Newcastle to Greenpark in order to provide a venue for a more fitting manner ‘befitting of a civilised community’ (resolution of Total Abstinence Association 1867 cited in Spellissy 1998), there was an incident at the very first race held there when the *Limerick Chronicle* newspaper reported that a

faction fight began shortly after the start of the horse races, near the entrance and in the vicinity of what was known as the Water Leap (cited in Spellissy 1998). The location of this water leap is not known today, but it might be surmised that it was a jump along the course at some point.

It would appear that the racecourse was named after 'Green Park House'; a structure that was situated on the western side of what is now Southern Circular Road, and to the southeast of the subject site. This house is marked on the six-inch ordnance survey map, indicating that Greenpark house pre-dated the 1840s. It is also shown on the 25-inch map dated to c. 1900; with the race course also visible on this map. There is a house at present on this site named Greenpark House. The house appears to be modern in date, though, it may incorporate earlier fabric.

The course was used for horse racing and for other events such as horse shows and trade fairs and even hosted GAA events prior to the construction of the Gaelic Grounds on the Ennis Road. Greenpark Racecourse hosted three nationally significant events of social history; a visit by President John F. Kennedy in 1963; John Treacy won a gold medal at the world cross country championships there and a papal visit by Pope John Paul II, both in 1979 (see section 4.5). Issues such as flooding on the course, traffic congestion and a limited fixture list led the race course to be moved to Greenmount near Patrickswell, which was purchased in 1996 and opened in 2001. Greenpark closed as a race course in 1999 after 130 years of racing. The last race meeting at the venue took place on 21 March 1999.

4.2 Archaeology

There are currently no recorded monuments within the subject site (Figs 4.1–4.3). The archaeology of its general vicinity provides a background context to the potential archaeology that may be found on the subject site during the course of any proposed re-development of it. The closest recorded monument is over 200m from the boundary of the subject site. The archaeology of the vicinity is detailed in Table 4.1 below.

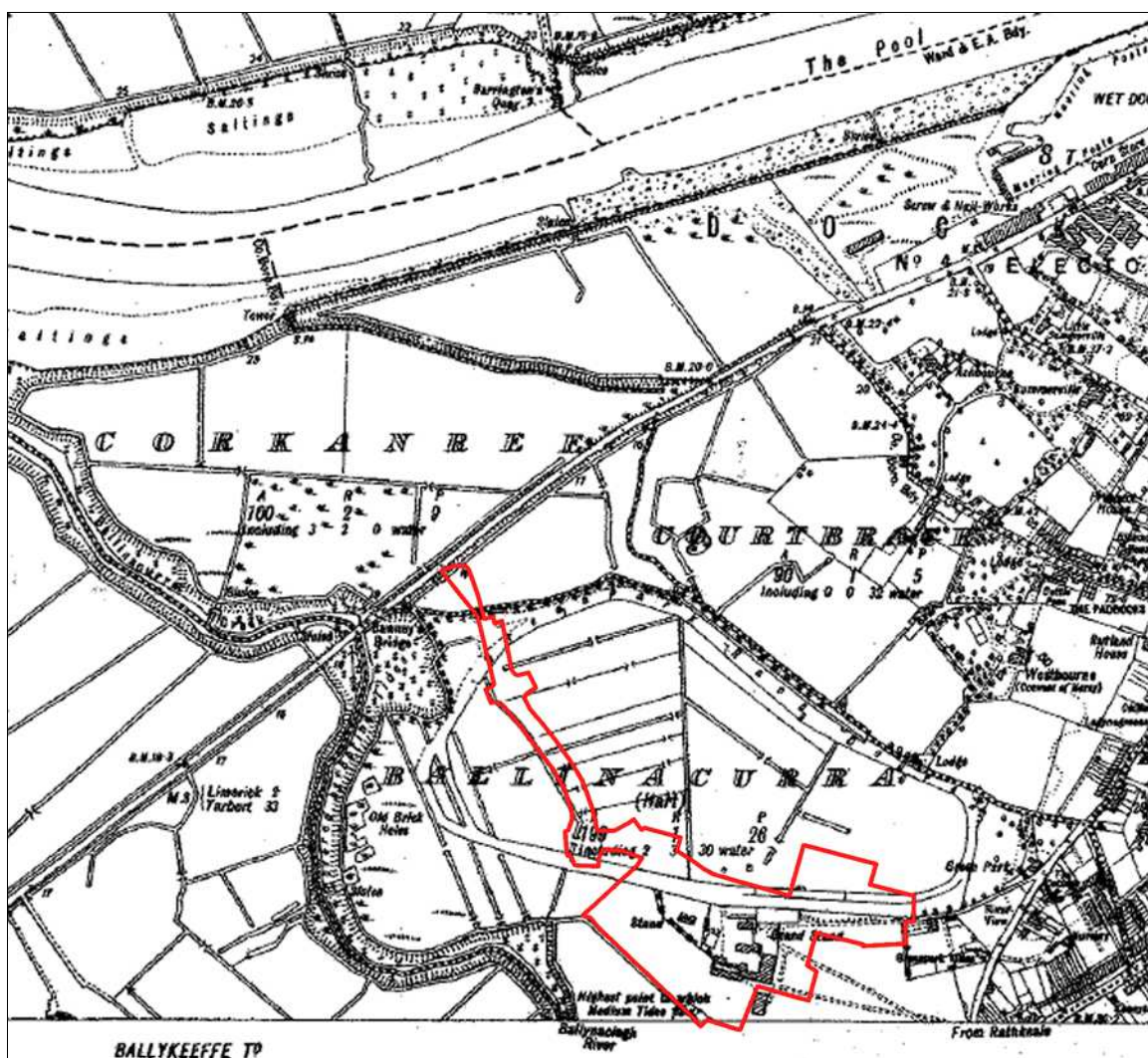


Figure 4.1. RMP map extract, Limerick sheet 5 (ASI 1997) on 1938 edition six-inch OS map. Subject site indicated in red. North to top (for indication only).

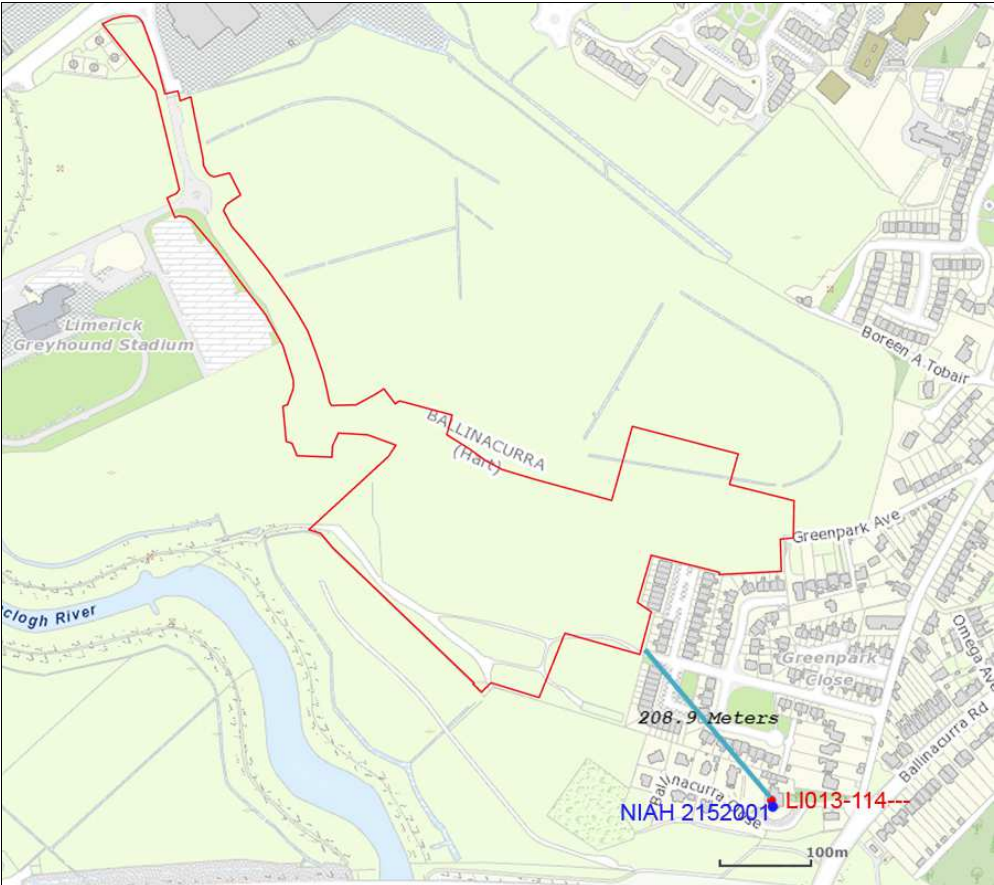


Figure 4.2. Subject site outlined in red (ASI www.archaeology.ie). Closest archaeological monuments labelled in red (for indication only).



Figure 4.3. Digital Globe aerial photography extract (ASI www.archaeology.ie). Subject site outlined in red. North to top (for indication only).

Table 4.1. Known archaeological monuments in the vicinity of the subject site.

RMP/SMR	Scheduled for inclusion in next revision of RMP?	Class	Townland	Description (after ASI)	Distance from subject site
LI013-114-- -	Yes	Castle Unclassified	Ballinacurra (Hart)	<p>The precise location of Dewlish or Ballinacurra (Béal Átha na Cora) Castle within the townland <i>has not been identified</i>. Ballinacurra House (NIAH No. 21525001 see Table 4.3 below) may have been built on the site of the medieval castle. Westropp (1906-07, 151) recorded the following details about Ballinacurra Castle; '1590 T. Arthur died, seized of the Castles of Reibogg, Delishe, and Ballywiline (Inq. Chan., 17). 1634-1633 Nic[holas]. Arthur held Dwylish, Rathmichell, and Crewe lwally (Ibid., 12, 112). 1624 Sir W. Parsons held Dewlishe or Beallancor C[astle]. (Pat. R.). 1657 Beallnacorrie, a broken C[astle]. and mill-seat on the brook Corkanrye, late estate of T. Arthur (C.S., xxix., p. 22; and D.S.A., 1-10)'. The 1654-56 Civil Survey of Limerick recorded that Thomas Arthur late of Limerick, alderman and Irish papist who was lately deceased was the owner in Ballinacurra of a 'broken castle & a Mill seate' (Simington 1938, 474). The castle of Ballinacurra is depicted standing close to a bridge (LI013-012----) over Ballynaclogh River on the 17th century Down Survey map of South Liberties Barony (Hib. Reg.). A tower house like castle is depicted standing close to the bridge and a watermill on the 17th century Down Survey map of the parishes of St. Michael's and St. Nicholas (NLI, MS. 718). The location of Ballinacurra House as shown on the 1840 ed. OSi 6-inch map closely corresponds to the location of the castle as shown on the 17th century Down Survey maps. Compiled by: Caimin O'Brien, ASI Date of description upload: 26 November 2020.¹</p>	209.9m

¹ References used in ASI description:

Hibernia Regnum: A set of 214 barony maps of Ireland dating to the period AD 1655-59. The original parish maps have been lost but the Hibernia Regnum maps are preserved in the Bibliotheque Nationale, Paris (Goblet 1932, v-x). Photographic facsimiles of these maps were published by the Ordnance Survey, Southampton in 1908; NLI, MS 718 - National Library of Ireland, Parish maps with terriers, showing forfeited lands in County Limerick, commonly known as the 'Down Survey', executed under the direction of Sir William Petty, 1657, and copied by Daniel O'Brien, 1786; Simington, R.C. (ed.) 1938 *The Civil Survey, AD 1654-1656. Vol. IV: County of Limerick, with a section of Clanmaurice barony Co. Kerry*. Dublin: Irish Manuscripts Commission; Westropp, T.J. 1906-7 The ancient castles of the county of Limerick. *Proceedings of the Royal Irish Academy*, **26**, 54–264.

4.2.1 Previous archaeological work

A search of the licenced archaeological work database www.excavations.ie did return licenced archaeological works being undertaken in the townland of Ballinacurra (Hart). Three related to archaeological investigations in the Ballynaclogh River, upstream of the subject site. One investigation included the monitoring of a 16m wayleave for the Limerick Main Drainage Scheme which ran across the race course. Nothing of an archaeological nature was noted in that investigation. Summaries of the work are provided in Table 4.2.

Table 4.2. Summary of licenced archaeological work undertaken in the vicinity of proposed development (after www.excavations.ie. Accessed 31 March 2021).

Licence Number	Excavations.ie number	ITM	Project Name and Summary of works	Author
99E0643	1999:480	532152, 620586	Monitoring of topsoil-stripping for the Limerick Main Drainage Southern Interceptor pipeline wayleave commenced in October 1999 and is scheduled to continue for 12-18 months. Small sections of the pipeline corridor are opened consecutively, and these are archaeologically monitored as they become available. The pipeline crosses several townlands on the southern outskirts of Limerick City, runs close to two known monuments (SMR 13:15 and 13:20) and will tunnel under the site of Ballinacurra Bridge (SMR 13:12). The pipeline runs for 5.26km from the proposed Pumping Station at Corkanree, opposite the Dock Road by Roche's, to the Bawnmore estate in Banemore Townland. To date, topsoil-stripping has been carried out over 1.46km, with a wayleave width of 16m, from the Dock Road through the racecourse to Ballinacurra Bridge. No archaeological soils or features were encountered.	P. Stevens
A005/1009	2005:956	555810, 654744	Riverine archaeological assessment took place as part of the proposed Limerick southern ring road (Phase II), Southern Contract. A pre-disturbance archaeological assessment of a 55m stretch of Ballynaclogh (Area UA3) was carried out. The survey area extends across the townland boundaries of Ballinacurra (Hart) and Ballykeeffe. Systematic visual inspection of the riverbed, intertidal and bankside elements of Ballynaclogh River were undertaken at the proposed river crossing. In addition, where practicable, a comprehensive magnetometer survey by hand-held metal detection was undertaken. No archaeologically significant material was revealed.	R. Bangerter
A005/1008	2005:957	556174, 654082	Riverine archaeological assessment took place as part of the proposed Limerick southern ring road (Phase II), Southern Contract. A pre-disturbance assessment of a 300m stretch of Ballynaclogh River (Area UA2) was undertaken. The survey area extends across the townland boundaries of Ballinacurra (Weston), Ballinacurra (Hart), Ballykeeffe and Dooradoyle. Systematic visual inspection of the riverbed, intertidal and bankside elements of the Ballynaclogh River were carried out at the proposed river impact area UA2. An archaeological assessment, including total station recording, of Ballinacurra Bridge was made. Where practicable, a comprehensive magnetometer survey by hand-held metal detection was carried out. Two features of archaeological interest were identified as a result of the survey: Site 1, a series of timber pilings located 75m downstream of	R. Bangerter

			Ballinacurra Bridge, and Site 2, an early bridge structure encased between the 19th- and 20th-century components of the existing road bridge, SMR 13:12. No further archaeologically significant material was revealed.	
A005/1007	2005:958	557210, 654644	Riverine assessment took place as part of the proposed Limerick southern ring road (Phase II), Southern Contract. The assessment was carried out along a 150m stretch of Ballynaclogh River within the townlands of Ballinacurra (Weston) and Rosbrien. Systematic visual inspection of the riverbed, intertidal and bankside elements of Ballynaclogh River were undertaken at the proposed river crossing. In addition, where practicable, a comprehensive magnetometer survey by hand-held metal detection was undertaken. No archaeologically significant material was revealed.	R. Bangerter

4.2.2 Artefact and wreck finds

A search of the National Museum of Ireland (NMI) Topographical Files, and the NMI Finds Database 2010 available at <https://www.heritagemaps.ie/WebApps/HeritageMaps/index.html> (accessed 31 March 2021) did not yield any results for the townland of Ballinacurra (Hart). Limerick City Museum has a number of artefacts and items relating to the racecourse at Greenpark (such as racing cards), which would be of historical rather than archaeological interest. The Urban Archaeology Survey for Limerick (Bradley et al 1989) lists several stray finds for the city, although none appear to be from the subject site or its immediate vicinity.

The National Monuments Service Wreck Viewer does not record any wreck for the subject site or vicinity. An unnamed wreck is recorded as being lost in June 1832 between ‘Monsell’s Creek and Ballinacurra Creek’. It was an open sail boat that was lost on the River Shannon. Three people were lost but a further four survived. This accident was reported in the *Freeman’s Journal* on 16 June 1832 (O’Sullivan 2001, 326).

4.3 Cartographic images of the subject site

The seventeenth century Down Survey maps were consulted for the subject site and they did not show anything new of interest in the location of the subject site. It is noted that Ballinacurra is shown on the map as 'Belanacurry' (see Fig. 4.4).

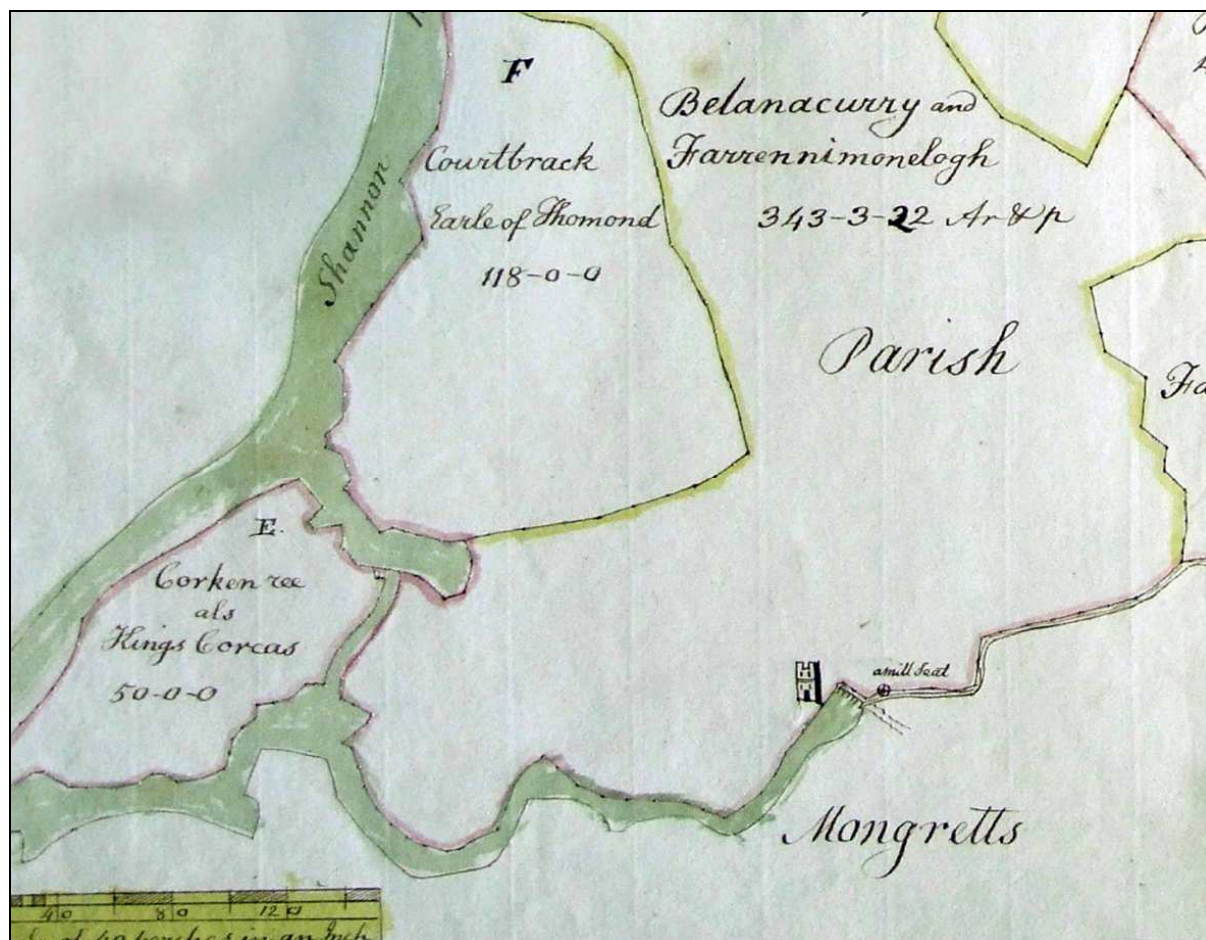


Figure 4.4. Extract of seventeenth-century Down Survey county mapping for Co. Limerick; parish of St Michael's then recorded as in the barony of the South Liberties of the city. The castle shown likely marks the approximate location of Ballinacurra House which lies approximately 200m to the south east of the subject site. North to top of image (for indication only).

The first edition OS six-inch map (sheet 5; Fig. 4.5), dated c. 1840 shows a series of fields accessed by a track from Green Park House to the east. Several small fields associated with four structures and a limekiln are depicted in the area of the proposed modern development. The entire general area is marked 'liable to flood'. 'Old brick holes' are indicated outside the subject site to the west and south.

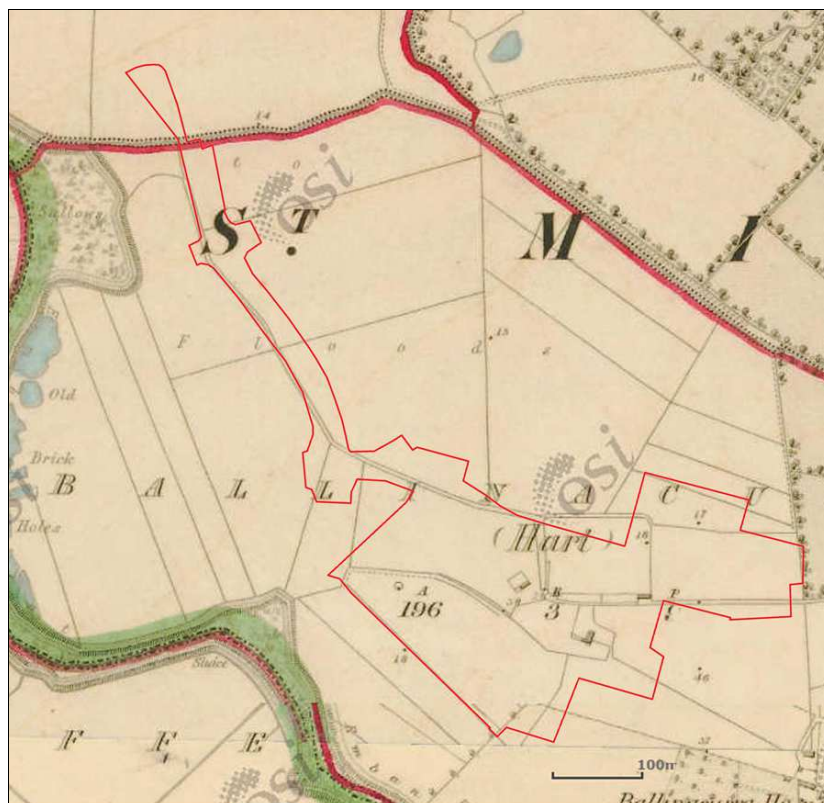


Figure 4.5. Subject site in red on OS first edition (c. 1840) 6-inch map (after www.archaeology.ie). North to top (for indication only).

The later OS 25-inch map (c. 1900) shows Greenpark racecourse. The structures and limekiln depicted on the first edition six-inch map are no longer extant, with the 'grandstand' and associated buildings in their place on this map. Several drainage ditches have also been added (Fig. 4.6).

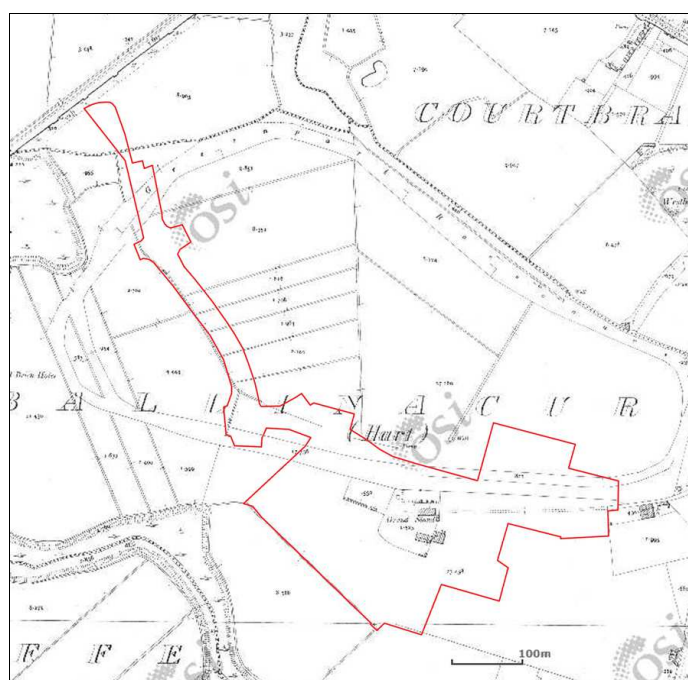


Figure 4.6. Subject site in red on 25-inch OS map (after www.archaeology.ie). North to top (for indication only).

Griffith's Valuation mapping dated to 1853 was consulted for the subject site (Fig. 4.7). Nothing new that might have been of archaeological or cultural heritage interest was noted on the mapping. Griffith's Valuation or the primary valuation of Ireland was carried out between 1848 and 1864 to determine liability to pay the 'poor rate' (for the support of the poor and destitute within each Poor Law Union). It provides detailed information on where people lived in mid-nineteenth century Ireland and the property they possessed. For the subject site it recorded that plot 2 was owned by Mahony Hart Esquire and Plot 3 was owned by Thomas and Anthony Vokes

(Griffith's Valuation, p. 71. Available at: <http://askaboutireland.ie/griffith-valuation/index.xml?action=placeSearch>. Accessed 31 March 2021). Both owners had several tenants listed, which included land, houses, gardens and offices (outbuildings).

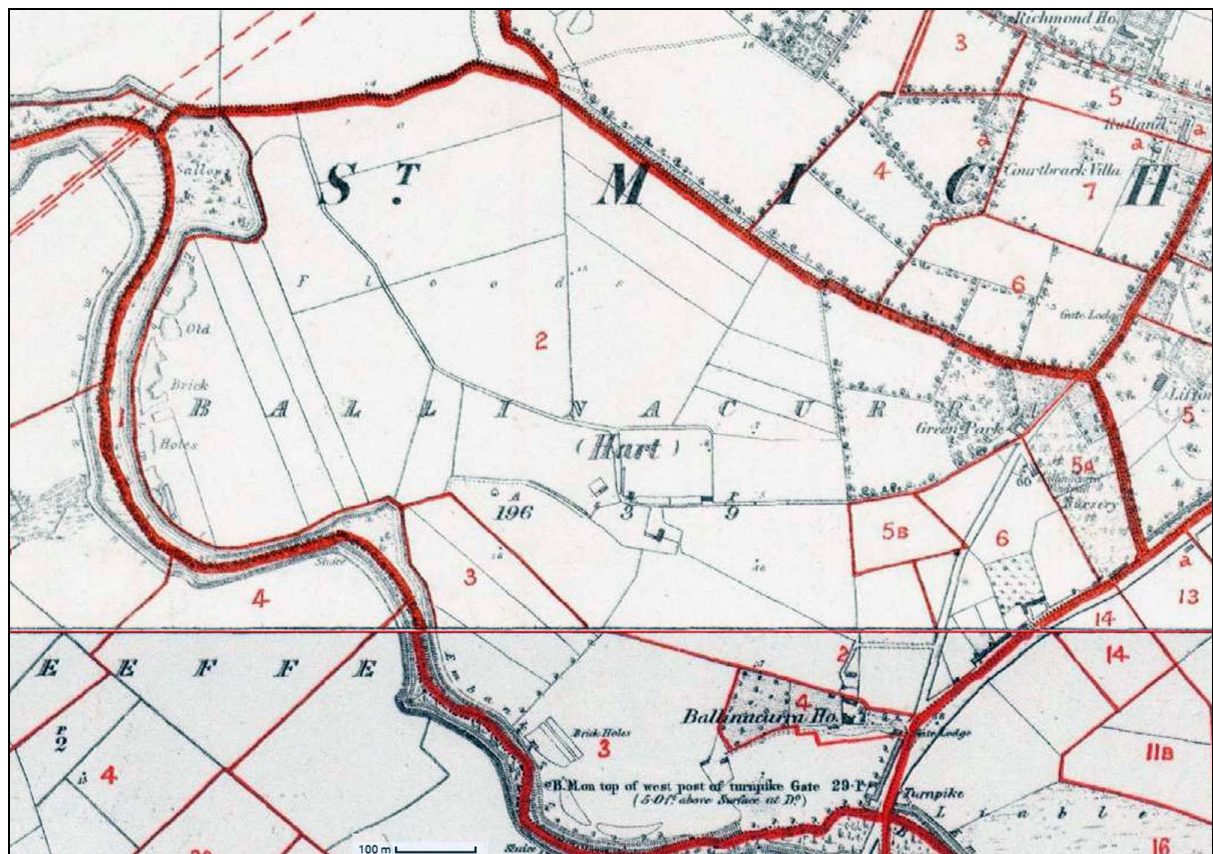


Figure 4.7. Plots in Griffith's Valuation dated c. 1853. North to top. Subject site corresponds with portions of plots 2 and 3 (for indication only).

4.4 Protected structures and historic architecture

There are no protected structures within the boundary of the subject site or within its immediate environs. The closest structure of architectural merit is Ballinacurra House which is situated over 200m to the southeast of the subject site. This is listed on the NIAH. Details are provided in Table 4.3.

Table 4.3. Known architectural monuments in the vicinity of the subject site.

NIAH	Rating	Usage	Townland	Description and appraisal (after NIAH)	Distance from subject site
21525001	Regional	House, now office	Ballinacurra (Hart)	<p>Described as a freestanding three-bay two-storey rendered house, built in 1843, distinguished by a centrally-placed Doric entrance porch, a two-storey three-sided canted bay window to the three-bay west elevation, and large two-storey return to rear. Hipped artificial slate roof with clay ridge tiles, overhanging eaves with uPVC panelled soffit. Rendered chimneystacks with rendered cornice, flaunching, and octagonal clay pots. uPVC rainwater goods. Painted rendered walls with rendered plinth base, moulded platband delineating first floor level and shallow frieze architrave and cornice beneath eaves. Throughout there are square-headed window openings painted rendered reveals, limestone sills and uPVC windows. Round-arch stair hall window to return elevation with painted rendered reveals, limestone sill, and two-over-two timber sash window, with double-arch and disk glazing bars to upper sash. Doric entrance porch on limestone base, comprising rendered pilasters and full Doric columns flanking open porch entrance and supporting a plain entablature with stepped blocking course; closed sides with round-arch side light openings flanked by Doric pilasters with running mould cornices supporting archivolt with keystone. Moulded rendered sill and panelled rendered apron beneath. Tripartite timber doorframe with stopped roll moulded detailing, comprising frosted glass sidelights over panelled timber base, and tripartite overlight; raised and fielded panelled timber door with central fillet moulding. Multiple-bay dormer two-storey rubble limestone outbuildings encloses north boundary of yard to immediate rear site of house. Adapted for office use with alterations including the insertion of roof lights to pitched slate roof, and timber-clad extensions joined by glazed link on south elevation. Located within mature grounds, much diminished by construction of modern low-density housing. Mature trees to grounds, which are enclosed from the road by rubble limestone walls. Entrance gates comprising quadrant concave rubble granite screen walls with limestone ashlar gate piers supporting wrought-iron vehicular gates flanked by pedestrian gates.</p> <p>Appraisal: This fine detached house overlooks the Ballynacrough River Valley to the south where views of the house add to its significance as one of the remaining suburban villas in the area to retain, albeit greatly diminished, a fine garden setting. The house, now in office use, is typical of the sobre classical detailing and simple symmetry of the front elevation, which one associates with the villas on the outskirts of Limerick City.</p>	209.9m

4.5 Social history and folklore: Intangible cultural heritage

Folklore is considered intangible cultural heritage. A search of the national database of folklore was undertaken. No specific references were found to any folklore or legends associated with Ballinacurra or Greenpark Racecourse (<https://www.duchas.ie/en>. Accessed 31 March 2021). Three historical events of national importance happened at Greenpark Racecourse. An historic political event was a visit by the then US President John F. Kennedy in 1963 where he addressed a crowd of up to 6,000 people at Greenpark (Figs 4.8, 4.9; <https://limerickslife.com/john-f-kennedy/>. Accessed 31 March 2021). In sport, the athlete John Treacy won a gold medal at the World Cross Country Championships held at Greenpark racecourse (Figure 4.10); and later a papal visit by Pope John Paul II (Figure 4.11); both occurred in 1979.



Figure 4.8. US President Kennedy addresses the crowd at Greenpark Racecourse, 29 June 1963 Limerick. (<https://www.google.com/url?sa=i&url=https%3A%2F%2Fwww.pinterest.ie>).



Figure 4.9. Preparations at Greenpark for visit of President JF Kennedy to Limerick in 1963 (<https://memorylanelimerick.com/p710322907/hf0A5C6#hf0a5c6>).



Figure 4.10. John Treacy winning the World Cross Country title at Greenpark Racecourse, Limerick on 25 March 1979.
(<https://imengine.public.prod.cmg.infomaker.io/?uuid=bd9f86f3-4fc6-5db1-93f2573892ad889b&function=fit&type=preview&source=false&q=75&maxsize=1200&scaleup=0>).



Figure 4.11. Pope John Paul II at Greenpark Racecourse, Limerick, 1 October 1979.
(<https://cdn.extra.ie/wp-content/uploads/2018/08/20150709/Pope-John-Paul-II-Visit-Ireland-1979-22.jpg>).

5. Impact of Proposed Development

This section might be more accurately described as the *prediction* of impacts on the archaeology and cultural heritage since the impacts by definition have not yet occurred (EPA 2017; 2018). Please refer to section 3.1 above for a general description of any future development proposed and section 3.2 for a description of the existing environment. The subject site does not lie within the zone of notification for any known archaeological monument; nor does it lie within the zone of potential for the historic town of Limerick. Despite this, best practice dictates that due to the size and scale of subject site that some archaeological/cultural heritage mitigation would be put in place. Predicted negative impacts to the cultural heritage resource of the subject site are detailed below:

5.1 The ‘do-nothing’ impacts

If nothing occurs at the subject site, it will remain as is, and any potential archaeology will remain undisturbed subsurface but will inevitably succumb to deterioration due to natural formation processes over time.

5.2 The predicted impacts

There are no known recorded archaeological monuments or historic buildings within the subject site and no ‘new’ archaeological features were noted during the site inspection. The subject site on the basis of its size and location close to the River Shannon and its tributary the Ballynaclogh River (Ballinacurra Creek) has the potential to contain subsurface archaeology of any time period. In light of this, the description and evaluation of the predicted impacts on the potential subsurface archaeology of the subject site are as follows (Table 5.1):

Table 5.1. Predicted impacts of proposed development on the cultural heritage resource.²

Predicted Impact No.	Description	Predicted impact without mitigation Negative/Neutral/Positive
1.	All ground works associated with the development of the subject site on the potential underlying archaeology that may be on site.	Negative (potential loss of archaeological information without record).
2.	Development of the entire site, which may lead to a loss of local historical memory about events and activities that occurred on the site.	Negative (potential loss of local historical information without record).

5.3 The ‘worst case’ scenario

Should the proposed re-development proceed without any archaeological/cultural heritage mitigation measures, there is a possibility that archaeological material may be uncovered and/or destroyed without the supervision or guidance of a professional archaeologist.

5.4 Interaction of impacts

No interaction of impacts was identified during this cultural heritage assessment process.

² Please see Annex 4 for explanation of the predicted impact scale used.

6. Conclusions and Suggested Mitigation

A Strategic Housing Development (SDA) development is proposed on lands of the former Greenpark racecourse at Ballinacurra (Hart) Limerick. It was noted during the fieldwork assessment and analysis of aerial photography over time that the southern portion of the subject site was filled in the past (see Fig. 6.1). This has influenced the mitigation measures proposed.



Figure 6.1. Google Earth image 5 April 2006. The central and southern portions of the proposed development area have been highly disturbed and appears to be covered in spoil deposition heaps and construction access roads (for indication only).

Bearing this in mind and following an evaluation of the predicted negative impacts in the section above, the following Table 6.1 lists suggested mitigation to alleviate those predicted negative impacts:

Table 6.1. Suggested archaeological mitigation measures.

Mitigation No.	Mitigation	Reason	Mitigates predicted negative impact no.
1.	That archaeological test trenching of the development be undertaken in the previously undisturbed portion of the proposed development area (Fig. 6.2).	<p>Due to the size and scale of the subject site and its development it is considered best practice to undertake general test trenching (see Dúchas 1999; 1999b). This is to ascertain if there are any unrecorded archaeological features lying subsurface (of any date) which would be destroyed without record by the development of the site.</p> <p>In the event that the test trenching reveals archaeological features further mitigation measures can be put in place (e.g., avoidance/preservation <i>in situ</i> or excavation/preservation by record) and carried out by a qualified archaeologist (see Dúchas 1999a; 1999b).</p>	1
2.	That archaeological monitoring of groundworks be undertaken in the previously disturbed and filled southern portion of the development (Fig. 6.2) i.e. the area to the S of the old racetrack.	<p>The southern portion of the subject site can be considered a brownfield site as it has already been disturbed, filled and used as a spoil deposition area. Because of this, it is suggested in this instance that archaeological monitoring should be undertaken during construction.</p> <p>In the event that the monitoring reveals archaeological features further mitigation measures can be put in place (e.g., avoidance/preservation <i>in situ</i> or excavation/preservation by record) and carried out by a qualified archaeologist (see Dúchas 1999a; 1999b).</p>	1
3.	That the three nationally important historical events that occurred on the subject site when it was Greenpark Racecourse be recalled in the new development.	To ensure that local memory is not lost and is preserved in a suitable appropriate way such as for example (but not limited to) street naming or through the use of agreed historic plaque(s)/signage.	2



Figure 6.2. Google Earth image 5 April 2006. Suggested area for archaeological monitoring mitigation in white hatching. Remainder of area suggested for test trenching (for indication only).

The suggestions made above are to mitigate the predicted negative impacts as set out in section 5 of this report. It is very important to note that it is the National Monuments Service (details below section 7) in consultation with the local authority; or An Bord Pleanála that may formulate and ratify any archaeological mitigation, should it be required, and this document can only make suggestions and report on the desk-top assessment and site inspection carried out. Archaeological mitigation may be recommended that has not been suggested in this report. The attention of the client, client agents and the developer is drawn to the relevant portions of the National Monuments Acts (1930–2014) which describes the responsibility of the site owners and procedures to report the finding of archaeological items, if any should be discovered during construction works, to the National Museum of Ireland and the National Monuments Service of the Department of Housing, Local Government and Heritage. This legislation also outlines the developer’s obligation to facilitate and fund all archaeological works that may be considered necessary by the National Monuments Service and/or the National Museum of Ireland in respect of development proposals. The state’s policy in relation to the archaeological heritage is available at:

<https://www.archaeology.ie/sites/default/files/media/publications/framework-and-principles-for-protection-of-archaeological-heritage.pdf>.

<https://www.archaeology.ie/sites/default/files/media/publications/excavation-policy-and-guidelines.pdf>.

7. Non-Technical Summary

7.1 Scope of study

This is a desktop study to assess the potential impact of any proposed development on the potential archaeological and cultural heritage significance of its site in the townland of Ballinacurra (Hart) comprising the former Greenpark Racecourse lands.

7.2 Method of study

A desktop study was undertaken which consulted all immediately available material relating to the site as listed in the project references. A site inspection was undertaken. COVID-19 mitigation strategies were followed.

7.3 Existing environment

The subject site comprises a portion of the now brown field Greenpark Racecourse. There are no known archaeological monuments on any portion of the subject site nor its immediate vicinity. There are no protected structures on the subject site or in its immediate vicinity.

7.4 Predicted impacts of proposed development

Any proposed development on the subject site may have a potential negative impact on the potential subsurface unrecorded archaeology of the site. This has been detailed above.

7.5 Conclusions and suggested mitigation

Methods of archaeological mitigation have been suggested (section 6). It is the remit of the National Monuments Service, however, to legally recommend any one or a combination of these mitigation measures and perhaps to make recommendations that have not been suggested above. These recommendations may be sent directly to the applicant or more usually through the local authority in question; or by An Bord Pleanála.

7.6 Further information & enquiries

Any enquiries in relation to archaeological mitigation on any proposed development, should it be required, may be directed to:

Archaeological Planning and Licencing Unit,
National Monuments Service,
Custom House,
Dept of Housing, Local Government, and Heritage
Dublin 1.
Phone: 01-8883177

Or through the local authority's archaeologist where one is employed; or in the case of a Strategic Housing Development (SHD), An Bord Pleanála.

8. Signing-Off Statement

Archaeological Firm: ÆGIS ARCHAEOLOGY LIMITED

Writer(s): F. Coyne BA MIAI
32 Nicholas St,
King's Island,
Limerick
V94 V6F7

Client: for Tom Phillips + Associates, Town Planning Consultants

Signed:



for ÆGIS ARCHAEOLOGY LIMITED

Report Status: Final

Dated: 19 September 2021

9. Project References

The following are references consulted during the compilation of this report. Not all are directly referred to in the text.

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Annexes

1. Legislation and regulation protecting the archaeological and architectural heritage resource

PROTECTION OF CULTURAL HERITAGE

Ireland is a signatory to, amongst others, two key international conventions that aim to protect cultural heritage. These are:

- The 1985 European Convention on the Protection of Architectural Heritage (the 'Grenada Convention'), which aims to 'make provision for the protection of monuments, groups of buildings and sites' that are of 'historical, archaeological, artistic, scientific, social or technical interest' (Article 1 & 3);
- The 1992 European Convention on the Protection of the Archaeological Heritage (the 'Valletta Convention'), which aims to 'protect the archaeological heritage as a source of the European collective memory and as an instrument for historical and scientific study' (Article 1).

Provisions made in these conventions have been transcribed into Irish law through the National Monuments (Amendments) Act 1930-2014, the Heritage Act 1995, the Cultural Institutions Act 1997, the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999 and the Planning and Development Acts and Regulations 2000-2013. Combined, these legal frameworks and associated national policies are the primary means of governing how cultural heritage in Ireland is protected and managed. Under Irish law archaeological monuments may include any humanly-made structures of whatever form or date except buildings that are habitually used for ecclesiastical purposes (for overview see *Frameworks and Principles for the Protection of Archaeological Heritage* Dúchas 1999).

The cultural heritage in Ireland is safeguarded through national and international policy designed to secure the protection of the cultural heritage resource to the fullest possible extent (Department of Arts, Heritage, Gaeltacht and the Islands 1999, 35). This is undertaken in accordance with the provisions of the European Convention on the Protection of the Archaeological Heritage (Valletta Convention), ratified by Ireland in 1997.

THE ARCHAEOLOGICAL RESOURCE

The National Monuments Act 1930 to 2014 (as amended) and relevant provisions of the National Cultural Institutions Act 1997 are the primary means of ensuring the satisfactory protection of archaeological remains, which includes all man-made structures of whatever form or date except buildings habitually used for ecclesiastical purposes. A National Monument is described as 'a monument or the remains of a monument the preservation of which is a matter of national importance by reason of the historical, architectural, traditional, artistic or archaeological interest attaching thereto' (National Monuments Act 1930 Section 2). A number of mechanisms under the National Monuments Act are applied to secure the protection of archaeological monuments. These include the Register of Historic Monuments, the Record of Monuments and Places, and the placing of Preservation Orders and Temporary Preservation Orders on endangered sites.

OWNERSHIP AND GUARDIANSHIP OF NATIONAL MONUMENTS

The Minister may acquire national monuments by agreement or by compulsory order. The state or local authority may assume guardianship of any national monument (other than dwellings). The owners of national monuments (other than dwellings) may also appoint the Minister or the local authority as guardian of that monument if the state or local authority agrees. Once the site is in ownership or guardianship of the state, it may not be interfered with without the written consent of the Minister.

Under Section 2, of the National Monuments Act 1930, a national monument is described as 'a monument or the remains of a monument the preservation of which is a matter of national importance by reason of the historical, architectural, traditional, artistic or archaeological interest attaching thereto'. National monuments in the ownership or guardianship of the State or of the Local Authority cannot be interfered with without the written consent of the Minister.

REGISTER OF HISTORIC MONUMENTS

Section 5 of the 1987 Act requires the Minister to establish and maintain a Register of Historic Monuments. Historic monuments and archaeological areas present on the register are afforded statutory protection under the 1987 Act. Any interference with sites recorded on the register is illegal without the permission of the Minister. Two months notice in writing is required

ÆGIS ARCHAEOLOGY LIMITED
REF.: 758-01

prior to any work being undertaken on or in the vicinity of a registered monument. The register also includes sites under Preservation Orders and Temporary Preservation Orders. All registered monuments are included in the Record of Monuments and Places.

PRESERVATION ORDERS AND TEMPORARY PRESERVATION ORDERS

Sites deemed to be in danger of injury or destruction can be allocated Preservation Orders under the 1930 Act. Preservation Orders make any interference with the site illegal. Temporary Preservation Orders can be attached under the 1954 Act. These perform the same function as a Preservation Order but have a time limit of six months, after which the situation must be reviewed. Work may only be undertaken on or in the vicinity of sites under Preservation Orders with the written consent, and at the discretion, of the Minister.

RECORD OF MONUMENTS AND PLACES

Section 12(1) of the 1994 Act requires the Minister for Arts, Heritage, Gaeltacht and the Islands (now the Minister for the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs) to establish and maintain a record of monuments and places where the Minister believes that such monuments exist. The record comprises a list of monuments and relevant places and a map/s showing each monument and relevant place in respect of each county in the state. All sites recorded on the Record of Monuments and Places receive statutory protection under the National Monuments Act 1994. All recorded monuments on the proposed development site are represented on the accompanying maps. Section 12(3) of the 1994 Act provides that 'where the owner or occupier (other than the Minister for Arts, Heritage, Gaeltacht and the Islands) of a monument or place included in the Record, or any other person, proposes to carry out, or to cause or permit the carrying out of, any work at or in relation to such a monument or place, he or she shall give notice in writing to the Minister of Arts, Heritage, Gaeltacht and the Islands to carry out work and shall not, except in the case of urgent necessity and with the consent of the Minister, commence the work until two months after the giving of notice'. Under the National Monuments (Amendment) Act 2004, anyone who demolishes or in any way interferes with a recorded site is liable to a fine not exceeding €3,000 or imprisonment for up to 6 months. On summary conviction and on conviction of indictment, a fine not exceeding €10,000 or imprisonment for up to

5 years is the penalty. In addition, they are liable for costs for the repair of the damage caused. In addition to this, under the European Communities (Environmental Impact Assessment) Regulations 1989, Environmental Impact Statements (EIS) are required for various classes and sizes of development project to assess the impact the proposed development will have on the existing environment, which includes the cultural, archaeological and built heritage resources. These document's recommendations are typically incorporated into the conditions under which the proposed development must proceed, and thus offer an additional layer of protection for monuments which have not been listed on the RMP.

THE PLANNING AND DEVELOPMENT ACT 2000

Under planning legislation, each local authority is obliged to draw up a Development Plan setting out their aims and policies with regard to the growth of the area over a five-year period. They cover a range of issues including archaeology and built heritage, setting out their policies and objectives with regard to the protection and enhancement of both. These policies can vary from county to county. The Planning and Development Act 2000 recognises that proper planning and sustainable development includes the protection of the archaeological heritage. Conditions relating to archaeology may be attached to individual planning permissions. Specific objectives are also outlined within the County Development Plans of counties and more specific local area plans which are published from time to time.

THE UNDERWATER ARCHAEOLOGY RESOURCE (MARINE, LACUSTRINE, AND RIVERINE ENVIRONMENTS)

These environments all have the potential to impact on known or potential underwater cultural heritage, including shipwrecks. The Minister for Culture, Heritage and the Gaeltacht is a statutory consultee under a number of Acts including the Foreshore Acts 1933 - 2011, the Dumping at Sea Act 1996, (and various amendments), various fisheries acts relating to aquaculture and Petroleum and the Other Minerals Development Act, 1960 (as amended 1990). This is in addition to the Planning and Development Act 2000 (as amended) and the associated Planning and Development Regulations. Developments, whether they are large infrastructural projects or smaller localised developments, can have the potential to impact underwater cultural heritage.

As a statutory consultee, the National Monuments Service's Underwater Archaeology Unit (on behalf of the Minister) assesses applications in relation to potential development impacts and, as appropriate, recommendations are forwarded to the relevant planning authority requesting that archaeological mitigation measures be attached as conditions on the grant of a planning permission, licence or permit to ensure the protection of the underwater cultural heritage.

The type of archaeological mitigation recommended will vary depending on the scale and impact of the development and the archaeological potential of the location. It may include but is not limited to the following: pre-development desktop assessments, archaeological dive surveys; geophysical surveys; wading and metal detection surveys; underwater archaeological assessment and pre-development archaeological testing.

Archaeological excavation or archaeological monitoring during the course of the proposed works may also be required where it is known that archaeology is present or likely to be present and when new discoveries are made. Where there are known sites or areas of high archaeological potential, however, avoidance and/or preservation in situ may be the preferred option. In this regard, planning applicants are required to engage the services of a suitably qualified and suitably experienced private sector archaeologist or archaeological company to implement the archaeological recommendations relating to a planning application or as a condition of any planning permission granted.

If a development is planned for an area of reclaimed land or in a marine, riverine or lacustrine environment, it is advisable that you first consult the Wreck Viewer (WIID) and downloadable list of wrecks to ensure that the developer/contractor is aware of the archaeological potential of the area where the proposed development is to be located, i.e., at the site of a known or potential wreck site. If a proposed development is located in an area where wrecks are known to exist or are thought to be located then the developer should contact the National Monuments Service seeking advice with regard to the appropriate course of action so as to ensure wrecks or associated wreck material are not negatively impacted. Additionally, the Record of Monuments and Places (RMP) should also be consulted to see if the proposed development is located near to or at a Recorded Monument,

National Monument or World Heritage Site. Further information can be obtained from the Archaeology and the Planning Process section of this website.

[Note on Developments in Areas of Reclaimed Land](#)

Areas along river channels, estuaries, lake shores and large swathes of the coastline have been reclaimed over the centuries. These areas have potential to retain the remains of vessels that were lost, abandoned or wrecked on ancient seabed, shorelines or earlier water courses prior to the reclamation works being carried out. Other features of archaeological importance may survive in areas of reclaimed land, such as jetties, quay structures, tidal mills and fish traps. In areas of reclaimed land where there is potential to find shipwrecks, associated artefacts and other site types there will be a need for an appropriate level of archaeological assessment in advance of proposed developments.

[The Protection of Wrecks under the National Monuments Acts 1930-2014](#)

The National Monuments Service Wreck Viewer displays data relating to wrecks and is made available here for the information of interested parties. It is important to note that the wreck viewer displays only wrecks whose locations are known; there are a large number of wrecks recorded in the Wreck Inventory of Ireland Database (WIID) that do not have precise locations. Records for these can be downloaded from the "Wreck Data Download" link on the banner/header of the wreck viewer. The database also includes records of the wrecks of aircraft where these have come to our attention. The inclusion of wrecks on this website does not constitute a statement in regard to any legal protection which may apply in any particular case. It is intended that this data will be of assistance to all marine environment researchers and stakeholders and those interested in or charged with protecting underwater cultural heritage, including anyone planning development in the marine, lacustrine or riverine environments.

[Legislation pertaining to wrecks](#)

There is robust legislation in place to protect wrecks and archaeological objects in Ireland's territorial waters,

in the intertidal zone and within the inland waterways. Section 3 of the National Monuments (Amendment) Act 1987 is the primary piece of legislation for the protection of wrecks over 100 years old and archaeological objects underwater irrespective of age. Wrecks that are less than 100 years old and archaeological objects or the potential location of such a wreck or archaeological object can also be protected under Section 3 of the 1987 (Amendment) Act; An underwater heritage order can be placed on a wreck or object if considered to be of sufficient historical, archaeological or artistic importance to merit such protection. In 1995 the wreck of RMS Lusitania, torpedoed in 1915 by German submarine U-20 off the Cork coast, was protected under the relevant provisions of the Act, though it was less than 100 years old at the time.

Diving, Survey and Salvage

Section 3 (4) of the 1987 Act provides that a person shall not dive on, damage, or generally interfere with, any wreck which is more than one hundred years old or an archaeological object which is lying on, in or under the sea bed or on or in land covered by water except in accordance with a licence issued by the Minister for Culture, Heritage and the Gaeltacht under Section 3 (5) of the Act. A licence is also needed under the same provisions of the Act to survey a wreck or archaeological object from a wreck site that is over 100 years old or one that is protected by underwater heritage order. Therefore, a licence is required to dive, interfere with or survey any protected wreck site or for deliberate searches for underwater archaeological objects. The Minister may, at her discretion, grant or refuse to grant a licence and may make a licence subject to such conditions as she thinks fit and which are specified in the licence. Application forms for dive/survey licenses can be downloaded from <https://www.archaeology.ie/publications-forms-legislation/forms> or by requesting an application form from the Licensing Section, National Monuments Service, Department of Culture, Heritage & the Gaeltacht, Custom House, Dublin 1.

Discovery obligations in relation to a wreck or artefact

Section 3 (6) of the 1987 Act (as amended) also provides that a person finding a wreck over 100 years old must within four days make a report of the find to either the Minister for Culture, Heritage and the Gaeltacht or the Garda Síochána. Section 3 (6) of the 1987 Act (as amended) also provides that a person finding an archaeological object which is lying on, in or under the sea bed or on or in land covered by water must within four days make a report of the find to the Director of the National Museum of Ireland. As clarified in a recent High Court judgement in relation to the wreck of the Lusitania (Judge Herbert, 2005), a wreck can equally be considered to be an archaeological object within the meaning of the act.

Merchant Shipping (salvage and wreck) Act 1993

It is a statutory obligation under the Merchant Shipping (Salvage and Wreck) Act 1993 that all material, including objects, recovered from any wreck or wreck material, including objects, from the sea shall be declared to the relevant Receiver of Wreck. The Receiver will then make enquiries with a view to establishing the ownership of the wreck or wreck-related material. In the absence of a known owner, the Director of the National Museum of Ireland can claim salvaged wreck material on behalf of the State.

Archaeological excavation and/or use of detection devices in relation to the underwater resource

Archaeological excavation and/or the use of detection devices such as metal detectors to search for archaeological objects on archaeological sites including protected wrecks is regulated under Section 26 of the 1930 National Monuments Act and Section 2 of the 1987 National Monuments (Amendment) Act. Consents for the use of hand-held metal detectors on protected wreck sites or for the purpose of searching for archaeological objects are only issued when they form part of a defined archaeological research project or are required for an archaeological impact assessment for planning related cases. Applications for excavation licenses and consents for use of detection devices are assessed by designated officers within the National Monuments Service.

THE ARCHAEOLOGICAL RESOURCE IN CAVES

Natural caves have the potential to yield archaeological deposits and artefacts. The study area has a very low potential to contain caves with archaeological potential though its underlying geology, limestone is conducive to the possibility of caves. Caves been used by people ever since the first settlers arrived in Ireland some 10,000 years ago (8,000 BC) and have served a wide variety of purposes: as places of burial, for the performance of ritual, as habitations or shelter for long- and short-term periods, for storage and as hiding places. The NMS and NMI have produced an advice leaflet entitled *Advice to the Public on the archaeological potential of caves* (2014).³

NOTE

Attention is also drawn to two current policy documents in regard to the archaeological heritage in the Republic of Ireland, available at: <https://www.archaeology.ie/sites/default/files/media/publications/framework-and-principles-for-protection-of-archaeological-heritage.pdf>;

<https://www.archaeology.ie/sites/default/files/media/publications/excavation-policy-and-guidelines.pdf>.

Please note that any archaeological/cultural heritage report can only report on the facts discovered during the project and make suggestions on suitable archaeological mitigation should it be required. It is the remit of the National Monuments Service, sometimes through the Local Authority, to legally recommend archaeological mitigation on a site-by-site basis, which may differ from the mitigation suggested.

³<https://www.archaeology.ie/sites/default/files/media/publications/NMS%20Caves%20Leaflet%20lo-res.pdf>.

THE ARCHITECTURAL RESOURCE⁴

Three pieces of legislation regulate protection for the architectural heritage: Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999; Planning and Development Act, 2000; and, the Planning and Development Regulations, 2001.

Significant steps have been taken towards the conservation of the architectural heritage through the introduction of comprehensive and systematic legislative provisions included in the planning code. These new legislative measures are supported by an architectural heritage advisory service at national level; the establishment, on a statutory basis, of the National Inventory of Architectural Heritage (NIAH); a scheme of grants for protected structures; and support for the employment of conservation officers by local authorities.

PROTECTION UNDER THE ARCHITECTURAL HERITAGE (NATIONAL INVENTORY) AND HISTORIC MONUMENTS (MISCELLANEOUS PROVISIONS) ACT 1999

This Act requires the Minister to establish a survey to identify, record, and assess the architectural heritage of the country. The National Inventory of Architectural Heritage (NIAH) was duly established in 1990. While the inclusion of a site in the inventory does not in itself provide statutory protection, the survey information is used in conjunction with the Architectural Heritage Protection: guidelines for planning authorities (published by the Department of Environment, Heritage and Local Government) to advise local authorities on the compilation of a Record of Protected Structures as required by the Part IV of the Planning and Development Act, 2000.

PART IV OF THE PLANNING AND DEVELOPMENT ACT 2000

Planning authorities have a clear obligation to create a record of protected structures (RPS) which includes all structures or parts of structures in their functional areas which, in their opinion, are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. This record forms part of a planning authority's development plan; They are also obliged to preserve the character of places and townscapes which are of special architectural,

historic, archaeological, artistic, cultural, scientific, social or technical interest or that contribute to the appreciation of protected structures, by designating them architectural conservation areas (ACAs); development plans must include objectives for the protection of such structures and the preservation of the character of such areas to ensure proper and sustainable planning and development; new responsibilities are given to the owners and occupiers of protected structures to maintain them and planning authorities have additional powers to ensure that buildings are not endangered either directly or through neglect. Financial assistance, in the form of conservation grants, is available from planning authorities to assist in this process. Owners or occupiers of a protected structure may seek a declaration (known as a section 57) from the relevant planning authority to determine the works to the structure that would materially affect its character and therefore require planning permission, and those works which may be carried out as exempted development.

Where a structure is protected, the protection includes the structure, its interior and the land within its curtilage and other structures within that curtilage (including their interiors) and all fixtures and features which form part of the interior or exterior of all these structures. All works which would materially affect the character of a protected structure, or a proposed protected structure, will require planning permission. Under the Act, protected structures which are regularly in use as places of public worship are subject to special requirements.

RECORD OF PROTECTED STRUCTURES (RPS) AND ARCHITECTURAL CONSERVATION AREAS (ACA)

The Local Government (Planning and Development) Act 2000 provides for the creation of a Record of Protected Structures (RPS) and for the identification of Architectural Conservation Areas (ACAs) by local authorities for inclusion in the county development plans. The legislation stipulates that planning permission is required in cases of any works that would affect the character of a structure listed on the Record of Protected Structures. The City Development Plan has a number of architectural and archaeological heritage policies and objectives outlined including to conserve and enhance the special character of the ACAs included in the plan.

OTHER LEGISLATION

A number of other Acts, plans and national guidelines, in addition to the above should be

ÆGIS ARCHAEOLOGY LIMITED
REF.: 758-01

⁴ This section is based on information available at <https://www.buildingsofireland.ie/resources/> through the Department of Culture, Heritage and the Gaeltacht (DAHG 2011).

considered when including structures in the RPS and carrying out forward planning or development control duties. Primary among them are the National Monuments Acts 1930–2014 (see below). The scope of the National Monuments Acts includes monuments of architectural, historical or archaeological interest, allowing overlap with the 2000 Act which protects structures of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest.

ROLE OF PLANNING AUTHORITIES

Planning authorities are empowered to protect the architectural heritage, in the interest of the proper planning and sustainable development within their respective functional areas, and to prevent its deterioration, loss or damage. This will be reflected in the adoption of suitable policies for protecting the architectural heritage in their development plans and giving practical effect to them through their development control decisions, generally by liaison between planning officers and conservation officers. The duties of a local authority apply across all its functions, for example as a planning authority, a building control authority, a fire authority and so on, to act positively to protect the architectural heritage when exercising their functions.

PRESCRIBED BODIES FOR THE PURPOSES OF PART IV OF THE ACT

The prescribed bodies in relation to the protection of the architectural heritage are set out in the Planning and Development Regulations 2001. They include the applicable government Minister, the Heritage Council, the Arts Council, Bord Fáilte and An Taisce. The prescribed bodies are sent notification of planning applications where it appears to a planning authority that the development: a) would involve the carrying out of works to a protected structure or a proposed protected structure; b) would involve the carrying out of works to the exterior of a structure within an ACA or an area specified as an ACA in a draft development plan or a proposed variation of a development plan, or c) might detract from the appearance of any of the above structures. The prescribed bodies must also be sent notification of statutory steps to review, draft, vary and make development plans and of proposals to make additions to or deletions from the RPS. The planning authority processes the observations of the prescribed bodies in the same way as all other submissions in relation to an application.

ROLE OF AN BORD PLEANALA

Under Section 13 of the Planning and Development (Amendment) Act 2002, any person to whom a declaration has issued under Section 57 (3), or a declaration reviewed under Section 57 (7) of the 2000 Act, may refer the declaration to An Bord Pleanála for review. This referral must be made within four weeks of the date of issue of the declaration. The details of any such declaration issued by the planning authority or of a decision by the Board must be entered on the planning register and the protected structure file kept by the planning authority. In addition, a copy of the declaration or decision must be available for inspection by the public during office hours at the offices of the planning authority.

2. Development plan and other plans' cultural heritage policies

*Chapter 10 of the current **Development Plan for Limerick City considers Built Heritage and Archaeology. The following policies (pertinent to this report) are listed in that document:***

Policy BHA.1 Heritage Plan

It is the policy of Limerick City Council to implement a 'Limerick City Heritage Plan' addressing the Natural, Built and Cultural Heritage within the City during the lifetime of the City Development Plan (page 10.1).

Policy BHA.2 Sites Within the Zone of Archaeological Potential

It is the policy of Limerick City Council to protect and enhance the archaeological value of the sites (and their settings) located within the 'Zone of Archaeology Potential' and all other features listed in the Sites and Monuments Record (page 10.3).

Policy BHA.3 Preservation of Archaeological Remains In-Situ

It is the policy of Limerick City Council to require Archaeological Impact Assessment be carried out on all development proposals that are likely to impact upon in-situ archaeological structures or deposits within the Zone of Archaeology Potential and / or within areas of archaeological importance as identified through the National Monuments Record (page 10.4).

Policy BHA.4 Protection of Limerick's Historic Street Pattern & Medieval Plot Widths

It is the policy of Limerick City Council to protect Limerick's historic street pattern, and in particular, seek to conserve and enhance the laneways within the setting of the streetscape and seek to retain and protect historic building lines and traditional plot widths where these derive from medieval origins (page 10.4).

Policy BHA.5 Survey of Medieval Remains

It is the policy of Limerick City Council to require a detailed Archaeological Survey of buildings proposed for demolition, where in the opinion of the City Council medieval fabric may be present (page 10.5).

Policy BHA.6 Protection of Limerick's Medieval City Walls

It is the policy of Limerick City Council to secure preservation in-situ of the historic medieval city walls as identified in the Conservation and

Management Plan for Limerick City Walls, 2008, and will have regard to the preservation and enhancement of the line of the city wall when considering development proposals in its vicinity. Disturbance, removal and alteration of the line of the city wall will not be permitted (page 10.5).

Policy BHA.7 Promotion of Limerick's Medieval City Walls

It is the policy of Limerick City Council to improve public awareness and increase knowledge and appreciation of the Medieval City Walls. This will be achieved through the implementation of the recommendations of the Conservation & Management Plan for Limerick City Walls, 2008 and any applications for funding to undertake restoration works will be strongly supported (page 10.6).

Policy BHA.8 Development on Burial Grounds

It is the policy of Limerick City Council to protect and enhance historic burial grounds and Settings (page 10.7).

Policy BHA.9 Industrial Archaeology

It is the policy of Limerick City Council that all development proposals for industrial buildings and sites of industrial archaeological importance must be accompanied by an Archaeological and Architectural Assessment of the building(s) and curtilage/surrounding environment (page 10.7).

Policy BHA.10 Underwater Archaeology

It is the policy of Limerick City Council that all development proposals which will impact on riverine, inter-tidal and sub-tidal environments should be accompanied by an Archaeological Assessment (page 10.8).

Policy BHA.10A Preservation of the Underwater Archaeological Heritage

It is the policy of the Council to seek the preservation (in situ, or at a minimum, preservation by record) of all known and all previously unrecorded sites and features of historical and archaeological record in riverine, lacustrine, estuarine and or marine environments (page 10.8).

Policy BHA.11 Re-Use & Refurbishment of Structures of Architectural Heritage merit & Protected Structures

It is the policy of Limerick City Council to positively encourage and facilitate the careful refurbishment of the Structures of Architectural Heritage merit and Protected Structures for sustainable and economically viable uses (page 10.8).

Policy BHA.12 Record of Protected Structures (RPS)

It is the policy of Limerick City Council to protect all structures indicated on the Record of Protected Structure which shall include structures or parts of structures which are of special social architectural, historical, archaeological, artistic, cultural, scientific social or technical interest and continually review the Record where necessary (page 10.9).

Policy BHA.13 Facilitating Development of a Protected Structure & Curtilage

It is the policy of Limerick City Council to facilitate developments to protected structures that do not materially affect the architectural character employing conservation best practice standards for any purpose compatible with the character of the building and to make available financial assistance where possible (page 10.9).

Policy BHA.14 Demolition of Protected Structures

It is the policy of Limerick City Council that proposals for demolition of a Protected Structure shall not be permitted except in exceptional circumstances and where it can be showed that a greater public interest will be served which outweighs the loss to the architectural heritage (page 10.10).

Policy BHA.15 Record of Protected Structures

It is the policy of Limerick City Council that when it is proposed to alter or demolish a Protected Structure, either partially or totally, a full record of the structure and significant elements shall be prepared to the International Council on Monuments & Sites (ICOMOS) standard which shall be forwarded to the National Archive and the Architectural Archives for record purposes (page 10.10).

Policy BHA.16 Historic Landscapes

It is the policy of Limerick City Council to ensure the historic landscapes and gardens throughout the City are protected from inappropriate development (page 10.10).

Policy BHA.17 Development in Architectural Conservation Areas

It is the policy of Limerick City Council to protect and enhance the special heritage values, unique characteristics and distinctive features from inappropriate external works within the four Architectural Conservation Areas as follows:

- ACA 1A South City Centre & Newtown Pery
- ACA 1B South Circular Road

- ACA 1C O'Connell Avenue
- ACA 2 John's Square
- ACA 3 Ballinacurra Road
- ACA 4 Ennis /Shelbourne Road

(page 10.12).

Policy BHA.18 ACA 1A South City Centre & Newtown Pery

It is the policy of Limerick City Council to protect and enhance the special heritage values, unique characteristics and distinctive features of ACA 1A (South City Centre, Newtown Pery & People's Park) as shown on Map 5.1A of the Development Plan, from inappropriate development affecting the external materials and features defined in the 'Statement of Character' and 'Key Threats to Character' (page 10.14).

Policy BHA.19 ACA 1B South Circular Road & New Street

It is the policy of Limerick City Council to protect and enhance the special heritage values, unique characteristics and distinctive features of ACA 1B (the South Circular Road and New Street) as shown on Map 5.1B of the Development Plan, from inappropriate development affecting the external materials and features defined in the 'Statement of Character' and 'Key Threats to Character' (page 10.15).

Policy BHA.20 ACA 1C O'Connell Avenue

It is the policy of Limerick City Council to protect and enhance the special heritage values, unique characteristics and distinctive features of ACA 1C (O'Connell Avenue) as shown on Map 5.1C of the Development Plan, from inappropriate development affecting the external materials and features defined in the 'Statement of Character' and 'Key Threats to Character' (page 10.16).

Policy BHA.21 ACA 2 John's Square

It is the policy of Limerick City Council to protect and enhance the special heritage values, unique characteristics and distinctive features of ACA 2 (John's Square) as shown on Map 5.2 of the Development Plan, from inappropriate development affecting the external materials and features defined in the 'Statement of Character' and 'Key Threats to Character' (page 10.17).

Policy BHA.22 ACA 3 Ballinacurra Road

It is the policy of Limerick City Council to protect and enhance the special heritage values, unique characteristics and distinctive features of ACA 3 (Ballinacurra Road) as shown on Map 5.3 [now Map 8E ACA3] of the Development Plan, from

inappropriate development affecting the external materials and features defined in the 'Statement of Character' and 'Key Threats to Character' (page 10.18).

[Policy BHA.23 ACA 4 Ennis/Shelbourne Road](#)

It is the policy of Limerick City Council to protect and enhance the special heritage values, unique characteristics and distinctive features of ACA 4 (Ennis/Shelbourne Road) as shown on Map 5.4 of the Development Plan, from inappropriate development affecting the external materials and features defined in the 'Statement of Character' and 'Key Threats to Character' (page 10.19).

[Policy BHA.24 Demolition in Architectural Conservation Areas \(ACAs\)](#)

It is the policy of Limerick City Council that the demolition of structures and parts of structures will in principle only be permitted in an Architectural Conservation Area where the structure, or parts of a structure, are considered not to contribute to the special or distinctive character, or where the replacement structure would significantly enhance the special character more than the retention of the original structure. Any structure or a part of a structure permitted to be demolished shall first be recorded prior to demolition, and shall be monitored during demolition (page 10.19).

Limerick City and County's Heritage Plan (Limerick City and County Council and The Heritage Council 2017) lists the following aims and objectives in relation to built cultural heritage:

[Aim 1](#)

To raise the awareness of, appreciation for and enjoyment of Limerick City and County's heritage (page 12).

[Aim 2](#)

To acquire knowledge through survey and research on heritage in Limerick City and County and to make it available to the wider public in a user-friendly manner (page 12).

[Aim 3](#)

To promote best practice and encourage heritage conservation and management (page 12).

[Aim 4](#)

To support the local economy and strengthen tourism (page 12).

[Archaeology Heritage Plan Objectives \(page 20\):](#)

1. To increase public awareness by:
a. Establishing a database of all historic graveyards sites in Local Authority ownership and make available on the Limerick City and County Council website to dovetail with the Historic Graves Project;
b. Establishing a community project to record all killeens throughout Limerick City and County; piloting a study with a community group on landscape archaeology with a view to expanding a model throughout Limerick.

2. To build knowledge by:

a. On-going survey and study including engaging with the research agendas of the Conservation & Management Plans for Kilmallock's Town Walls, Limerick City's Wall and the Lough Gur Environmental Management Study in regard to a research agenda and to support and assist the Dark Sky project in Lough Gur;
b. The promotion and encouragement of the production of Conservation & Management Plans for major sites such as the Mungret Monastic Complex and the Franciscan Friary, Adare.

3. To encourage best practice in conservation and management by:

a. Promoting the 'Adopt a Monument Scheme' on a pilot basis;
b. Establishing a steering group for the management and promotion of Limerick City's defences;
c. Continuing, in co-operation with the Irish Walled Towns Network, to consolidate the medieval defences of Kilmallock and Limerick City.
d. Meeting with the owners of tower houses and establishing a best practice guide for the maintenance of tower houses and as a flagship project, to continue works to preserve and maintain Bourchier's Castle, Lough Gur.

4. To support the local economy and strengthen tourism by:

a. Developing interpretative signage at publicly accessible sites;
b. Recording visitor numbers at major unmanned sites, establishing a trail of Limerick's Tower Houses and establishing a trail of early Christian sites in Limerick.

[Built heritage and conservation Heritage Plan Objectives \(page 23\).](#)

1. Identify partners and promote programmes for training in traditional skills and crafts, such as building with lime mortar, thatching, iron - work, weaving, traditional stone wall building and repair.

ÆGIS ARCHAEOLOGY LIMITED
REF.: 758-01

2. Establish and promote best practice in care, conservation, maintenance and recording of traditional shops fronts in Limerick City and County.
3. Promote the conservation and reuse of publicly and privately owned historic properties in the interest of sustainable development with long term benefits to the community, the environment and regeneration in Limerick City and County.
4. Support the development of Architectural Conservation Areas in Limerick through the collection of data, promotion of community participation and collective responsibility, and raise the public's awareness of the value of Limerick's historical built structures and streetscapes.
5. In co-operation with bodies such as School of Architecture University of Limerick (SAUL) and Limerick Institute of Technology (LIT) Department of the Built Environment, and other third level colleges to examine innovative means of promoting our built heritage through digitalisation projects and the use of Building Information Modelling (BIM).
6. To increase public awareness of the importance of historic structures including bridges, infrastructure associated with public services and industry including water pumps, gas infrastructure, railway infrastructure and milestones, and to assist where feasible refurbishment proposals.

[Architecture, urban medieval built fabric and public realm Heritage Plan Objectives \(page 24\).](#)

1. To promote the experience of the Local Authority in terms of best practice dealing with the redevelopment of archaeological and historically sensitive sites.
2. To increase public awareness of the importance of the historic structures and the need for appropriate traditional skills in the interest of future development of sites and their return to use.

*A **background paper** on environment, heritage, landscape and green infrastructure has been published in advance of the Limerick Development Plan 2022–2028. The new development plan will be the first plan since the amalgamation of the city and county local authorities that will consider the*

city and county together. In relation to cultural heritage that document notes the following:

4.1 Archaeological Heritage

Archaeological heritage is protected under various legislation including the National Monuments Acts (1930 – 2004), Natural Cultural Institutions Act 1997 and the Planning and Development Act 2000 (as amended). The coming together of the city and county means that a huge range of monuments from Kings John's Castle to ring forts will require an appropriate policy response. The estuary too provides its own range of archaeological features to consider, both within Limerick City and downstream. Riparian and instream archaeology are important elements, which shall also be considered and have significant historical value. It is worth giving specific mention to Lough Gur and the range of archaeological monuments and their settings that exist in that area. Given the unique setting and the nature of the archaeological character, it is worthy of its own landscape character area, defined by the area of archaeological and visual sensitivity that surrounds the lake. This Landscape Character Area and its zone of special development control provide the basis of Limerick's efforts to manage a sensitive area on a larger scale (page 13).

4.2 Architectural Heritage

The Limerick City Development Plan 2010 – 2016 (as extended) contains 435 protected structures. These are effectively a history of development in the City, with varying structures being dwellings, parts of transport infrastructure, such as canal locks and bridges and parts of Limerick's industrial past. In an urban environment, in particular, they add local character and in areas, where Architectural Conservation Area (ACA) designations are in place they can define the local character. Limerick City is notable for having six Architectural Conservation Areas, which play an important part in preserving the historical areas of the city.

Dereliction and abandonment are cited as being one of the main threats to the buildings and structures within ACAs in Limerick, followed by insensitive development. ACAs also play a part in the conservation of architectural heritage in County Limerick with ACAs present in Newcastle West and in Kilmallock, where the designation plays an important role in the conservation of the built heritage of both towns. They are also present in many of the other towns and villages of Limerick including Abbeyfeale, Askeaton, Bruff, Cappamore, Glin, Hospital and Rathkeale. There are approximately 1,500 Protected

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Structures currently identified in the Limerick County Development Plan 2010 – 2016 (as extended), scattered throughout the county, many located in towns and villages across Limerick.

The Record of Protected Structures included in the current City and County Development Plans is legislated for under Section 12 and Section 51 of the Planning and Development Act 2000 (as amended). Protected Structures are defined as structures, or parts of structures that are of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view. This plan will be the first to combine the architectural heritage of both Limerick City and County. The city is characterised by its extensive Georgian streetscapes, which are protected by Architectural Conservation Area designations. An Architectural Conservation Area (ACA) is a place, area, group of structures or townscape, which is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest and can sometimes contain a number of protected structures.

The new Development Plan will consider the implications of this and will update the policies for the architectural heritage of the city and county as a whole (page 14–15).

3. Guidance documentation

Dúchas (now NMS DHLGH) *Frameworks and Principles for the Protection of Archaeological Heritage* (1999);

- Dúchas *Policy and Guidelines on Archaeological Excavations* (1999);
- Environmental Protection Agency (EPA), *Guidance on the Information to be Contained in Environmental Impact Statements* (2002);
- Environmental Protection Agency (EPA), *Advice notes on Current Practice (in the Preparation of Environmental Impact Statements)* (2003);
- National Roads Authority (NRA now TII), *Guidelines for the Assessment of Architectural Heritage Impacts on National Road Schemes*, (2004);
- National Roads Authority (NRA now TII), *Guidelines for the Assessment of Archaeological Heritage Impacts on National Road Schemes* (2005);
- National Roads Authority (NRA now TII), *Environmental Impact Assessment of National Road Schemes – A Practical Guide* (2005);
- Institute of Archaeologists of Ireland, *IAI code of conduct for archaeological assessment excavation* (2006);
- Department of the Environment, Heritage and Local Government, *Archaeology in the Planning Process. Information Leaflet PL 13*. Dublin: Government of Ireland (August 2006);
- Department of Arts, Heritage and the Gaeltacht (now DCHG) *Architectural Heritage Protection Guidelines for Planning Authorities*. Dublin: The Stationery Office Government of Ireland (2011);
- Environmental Protection Agency (EPA), *Revised Guidelines on the Information to be Contained in Environmental Impact Statements. Draft* (September 2015);
- Environmental Protection Agency (EPA), *Advice Notes for Preparing Environmental Impacts Statements. Draft* (September 2015);
- Eirgrid *Cultural heritage guidelines for electricity transmission projects: a standard approach to archaeological, architectural and cultural heritage impact assessment of high voltage transmission projects* (October 2015).

- Environmental Protection Agency (EPA) *Draft guidelines on the information to be contained in environmental impact assessment reports* (2017);
- Department of Housing, Planning and Local Government *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*, (2018).
- TII *Project Appraisal Guidelines for National Roads Unit 7.0–Multi Criteria Analysis* (2016)

4. Assessment of impact type and magnitude

The EPA draft guidelines have been applied in this assessment which are broadly the same as the NRA/TII guidelines, which define various levels of predicted impact, which can be of a positive or negative type.

The NRA/TII guidelines are also useful as they have been specifically formulated for infrastructural projects from a specifically architectural and archaeological perspective. The TII have more recently applied an impact scale of 1–7 with 1 being a profound or significant negative impact and 7 being a significant positive impact. Negative impact types applied in this assessment are as follows:

- **Profound Negative Impact (1):** An effect which obliterates sensitive characteristics and applies where mitigation would be unlikely to remove adverse effect;
- **Significant or Very Significant Negative Impact (1):** An impact which, by its magnitude, duration or intensity, alters an important or sensitive aspect of the environment. An impact like this would be where part of a site would be permanently impacted upon, leading to a loss of character, integrity and data about an archaeological or cultural heritage feature/site;
- **Moderate Negative Impact (2):** an effect that alters the character of the cultural heritage feature in a manner that is consistent with existing and emerging trends. For example, where a change to the monument/cultural heritage feature is proposed which though noticeable, is not such that the integrity of the feature is compromised and which is reversible. This arises where an archaeological feature can be incorporated into a modern-day development without damage and that all procedures used to facilitate this are reversible;
- **Slight/Minor Negative Impact (3):** An impact which causes changes in the character of the environment which are not significant or profound and do not directly impact or affect a monument or cultural heritage feature;
- **Imperceptible/Neutral Impact (4):** An impact capable of measurement but without noticeable consequences.

The Guidelines also define the duration of impacts as follows:

- **Momentary:** an effect lasting from seconds to minutes;
- **Brief:** an effect lasting less than a day;
- **Temporary:** an effect lasting for less than one year;
- **Short-term:** an effect lasting one to seven years;
- **Medium-term:** an effect lasting seven to fifteen years;
- **Long-term:** an effect lasting fifteen to sixty years;
- **Permanent:** an effect lasting over sixty years.



ÆGIS ARCHAEOLOGY LIMITED

32 Nicholas Street | King's Island | Limerick City | V94 V6F7
086 829 3220 | info@aegisarc.com | www.aegisarchaeology.com
VAT Reg. No.: IE8275638 | Co. No.: 275638