

## CHAPTER 13

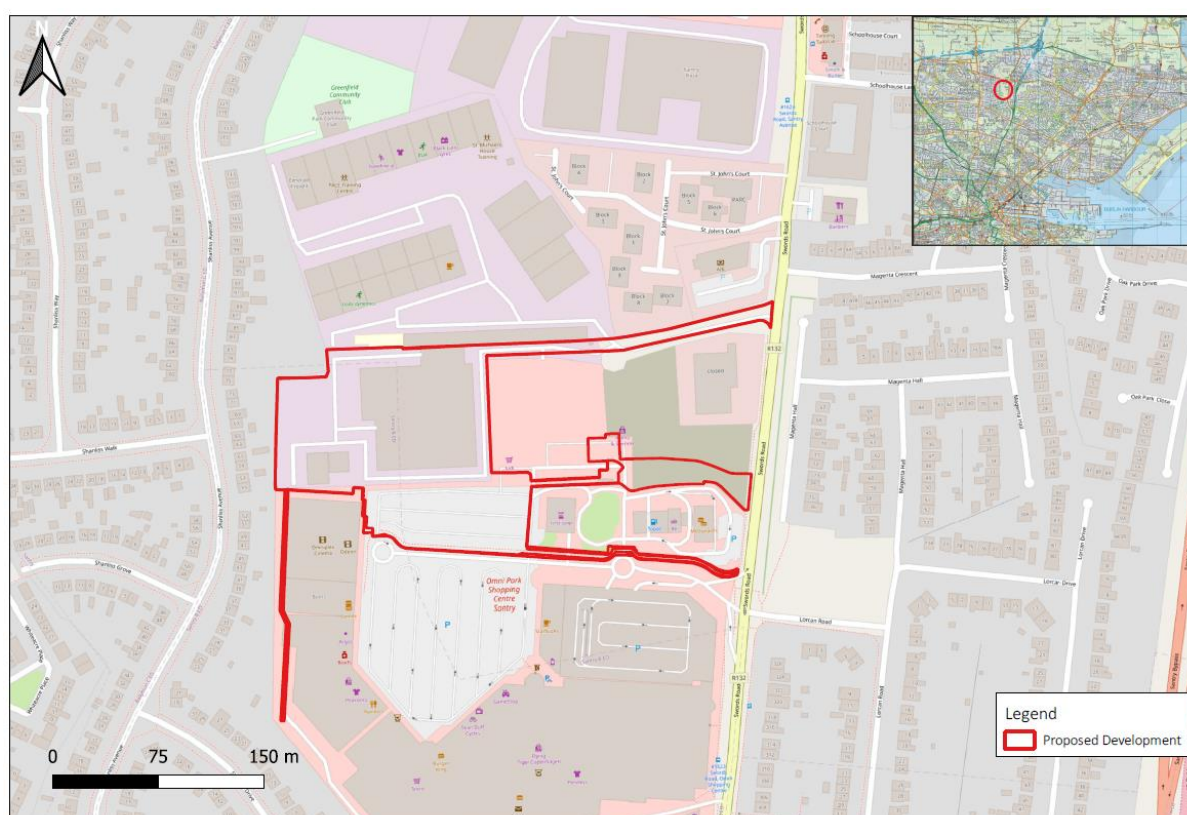
### ARCHAEOLOGICAL, ARCHITECTURAL AND CULTURAL HERITAGE



## 13.0 ARCHAEOLOGICAL, ARCHITECTURAL AND CULTURAL HERITAGE

### 13.1 INTRODUCTION

- 13.1 The following chapter details an archaeological, architectural and cultural heritage assessment undertaken in advance of the proposed Omni Plaza SHD, Omni Park, Swords Road, Santry, Dublin 9 (Figure 13.1, ITM 716432, 739639). This assessment has been carried out to ascertain the potential impact of the proposed development on the archaeological, architectural and cultural heritage resource that may exist within the area. The assessment was undertaken by Faith Bailey and Sam Fairhead of IAC Archaeology.



**Figure 13.1** Site Location

- 13.2 This study determines, as far as reasonably possible from existing records, the nature of the archaeological, architectural and cultural heritage resource in and within the study area (250m) of the development area using appropriate methods of study. Desk-based assessment is defined as a programme of study of the historic environment within a specified area or site that addresses agreed research and/or conservation objectives. It consists of an analysis of existing written, graphic, photographic and electronic information in order to identify the likely heritage assets, their interests and significance and the character of the study area, including appropriate consideration of the settings of heritage assets (ClfA 2014). In order to compile a complete baseline, a site inspection is carried out to complement the results of the desk-based assessment. This leads to the following:

- Determining the presence of known archaeological heritage sites that may be affected by the proposed development;
- Assessment of the likelihood of finding previously unrecorded archaeological remains during the construction programme; and
- Suggested mitigation measures based upon the results of the above research.

13.3 The study involved detailed interrogation of the archaeological and historical background of the development area. This included information from the Record of Monuments and Places of County Dublin (Figure 1.2), the City Development Plan, topographical files of the National Museum of Ireland, cartographic and documentary records. A field inspection was carried out on the 14th June 2021 in an attempt to identify any known archaeological features, along with previously unrecorded features, structures and/or archaeological artefacts within the proposed development area.

13.4 An impact assessment and a mitigation strategy have been prepared. The impact assessment is undertaken to outline potential adverse impacts that the proposed development may have on the cultural heritage resource, while the mitigation strategy is designed to avoid, reduce or offset such adverse impacts.

### 13.1.1 Definitions

13.5 In order to assess, distil and present the findings of this study, the following definitions apply:

13.6 'Cultural Heritage' where used generically, is an over-arching term applied to describe any combination of archaeological, architectural and cultural heritage features, where;

- the term 'archaeological heritage' is applied to objects, monuments, buildings or landscapes of an (assumed) age typically older than AD 1700 (and recorded as archaeological sites within the Record of Monuments and Places)
- the term 'architectural heritage' is applied to structures, buildings, their contents and settings of an (assumed) age typically younger than AD 1700
- the term 'cultural heritage', where used specifically, is applied to other (often less tangible) aspects of the landscape such as historical events, folklore memories and cultural associations. This designation can also accompany an archaeological or architectural designation.

## 13.2 METHODOLOGY

13.7 Research has been undertaken in two phases. The first phase comprised a desktop paper survey of all available archaeological, architectural and historic sources. The second phase involved a field inspection of the proposed development area.

### 13.2.1 Desktop Paper Survey

- Record of Monuments and Places for County Dublin;
- Sites and Monuments Record for County Dublin;
- National Monuments in State Care Database;
- Preservation Orders List;
- Topographical files of the National Museum of Ireland;
- Cartographic and written sources relating to the study area;
- Dublin City Development Plan 2016–2022;
- Draft Dublin City Development Plan 2022-2028;
- Aerial photographs;

- Excavations Bulletin (1970-2022)

- 13.8 **Record of Monuments and Places (RMP)** is a list of archaeological sites known to the National Monuments Section, which are afforded legal protection under Section 12 of the 1994 National Monuments Act and are published as a record.
- 13.9 **Sites and Monuments Record (SMR)** holds documentary evidence and field inspections of all known archaeological sites and monuments. Some information is also held about archaeological sites and monuments whose precise location is not known e.g., only a site type and townland are recorded. These are known to the National Monuments Service as 'un-located sites' and cannot be afforded legal protection due to lack of locational information. As a result, these are omitted from the Record of Monuments and Places. RMP/SMR sites are also listed on the Department of Housing, Local Government and Heritage (DoHLGH) website – [www.archaeology.ie](http://www.archaeology.ie).
- 13.10 **National Monuments in State Care Database** is a list of all the National Monuments in State guardianship or ownership. Each is assigned a National Monument number whether in guardianship or ownership and has a brief description of the remains of each Monument.
- 13.11 The Minister for the DoHLGH 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.
- 13.12 **Preservation Orders List** contains information on Preservation Orders and/or Temporary Preservation Orders, which have been assigned to a site or sites. 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.
- 13.13 **Topographical files of the National Museum of Ireland** are the national archive of all known finds recorded by the National Museum. This archive relates primarily to artefacts but also includes references to monuments and unique records of previous excavations. The find spots of artefacts are important sources of information on the discovery of sites of archaeological significance.
- 13.14 **Cartographic sources** are important in tracing land use development within the development area as well as providing important topographical information on areas of archaeological potential and the development of buildings. Cartographic analysis of all relevant maps has been made to identify any topographical anomalies or structures that no longer remain within the development area.
- William Petty's Down Survey Map, Barony of Coolock, Parish of Santry, c. 1655
  - John Rocque's Map of the City and County of Dublin, 1760
  - John Taylor's Map of the Environs of Dublin 1816
  - Ordnance Survey Maps, 1837-1907

- Geographic Section, General Staff (GSGS) Map, 1942

- 13.15 **Documentary sources** were consulted to gain background information on the archaeological and historical landscape of the proposed development area.
- 13.16 **Development Plans** contain a catalogue of all the Protected Structures and archaeological sites within the county/city. The Dublin City Development Plan (2016–2022) and draft plan (2022-2028) were consulted to obtain information on cultural heritage sites in and within the immediate vicinity of the proposed development.
- 13.17 **Excavations Bulletin** is a summary publication that has been produced every year since 1970. This summarises every archaeological excavation that has taken place in Ireland during that year up until 2010 and since 1987 has been edited by Isabel Bennett. This information is vital when examining the archaeological content of any area, which may not have been recorded under the SMR and RMP files. This information is also available online ([www.excavations.ie](http://www.excavations.ie)) from 1970-2022.

### 13.2.2 Field Inspection

- 13.18 Field inspection is necessary to determine the extent and nature of archaeological and historical remains, and can also lead to the identification of previously unrecorded or suspected sites and portable finds through topographical observation and local information.
- 13.19 The archaeological field inspection entailed:
- Inspecting the proposed development area and its immediate environs.
  - Recording the terrain type and land usage.
  - Recording the presence of features of archaeological significance and potential significance
  - Verifying the extent and condition of any recorded sites/ features.
  - Visually investigating any suspect landscape anomalies to determine the possibility of their being anthropogenic in origin.

## 13.3 CHARACTERISTICS OF THE PROPOSED DEVELOPMENT

- 13.20 The proposed development is described in detail in Chapter 2 (Description of the Proposed Development).

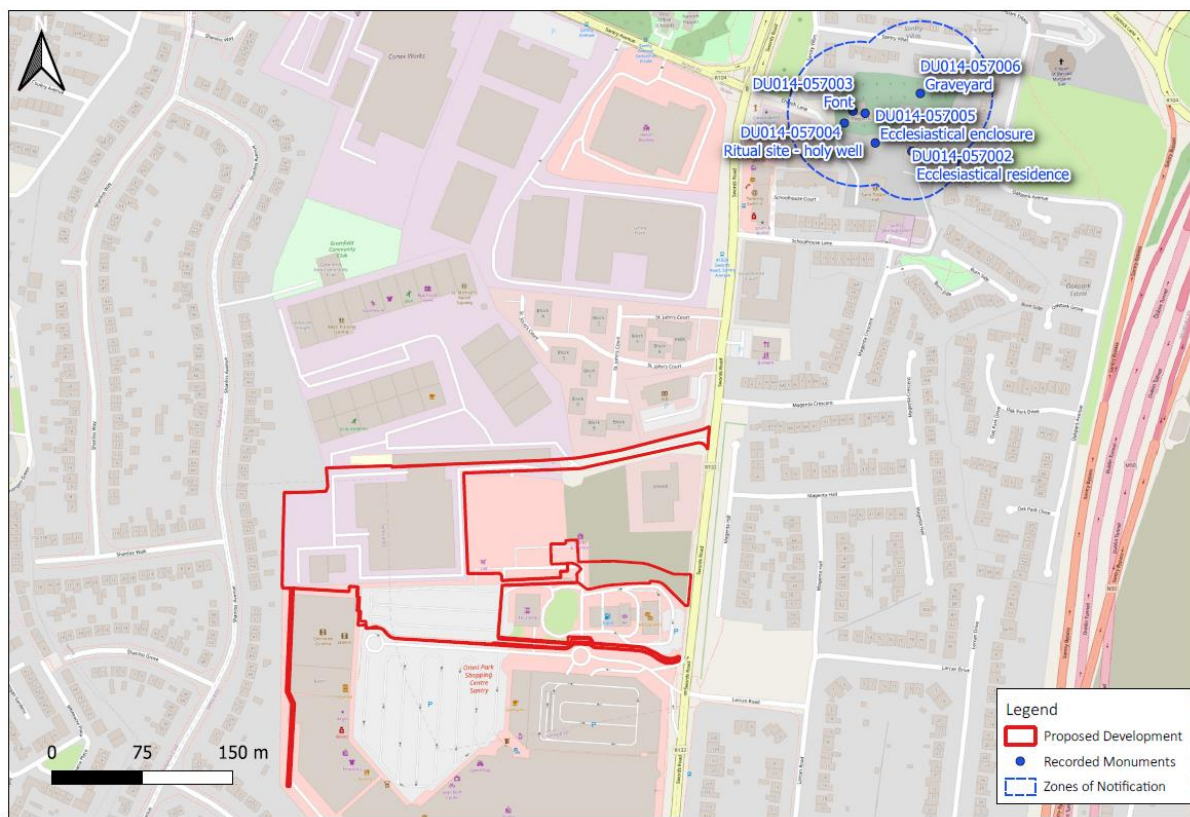
## 13.4 RECEIVING ENVIRONMENT

### 13.4.1 Archaeological background

- 13.21 The proposed development is currently a developed site occupied by industrial buildings, roadways and car parking areas located in the townland of Santry, civil parish of Santry and the barony of Coolock. The proposed development area lies on the west side of Swords Road (R132) and is bounded by residential properties along Shanliss Avenue to the west, Santry Hall Industrial Estate to the north and by retail properties and car parks of the Omni Shopping Centre to the south and east. The archaeological Zones of Notification (ZoN) associated with St Pappan's Church (DU014-057001), an ecclesiastical enclosure (DU014-057005) and St. Pappan's rectory (DU014-057002) fall within a 250m radius of the proposed development, c. 230m to the northeast (Figure 13.2). The church and rectory are both also recorded on the National Inventory of Architectural Heritage (NIAH, Reg. Nos.:50130115 and



50130116 respectively) and St. Pappan's Church (with its associated holy well, DU014-057004) is a Protected Structure (RPS 1517).



**Figure 13.2** Recorded Archaeological sites within the study area

#### 13.4.1.1 Prehistoric Period

##### Mesolithic Period (6000–4000 BC)

- 13.22 Although very recent discoveries may push back the date of human activity by a number of millennia (Dowd and Carden 2016), the Mesolithic period is the earliest time for which there is clear evidence of prehistoric activity in Ireland. During this period people hunted, foraged and gathered food and appear to have had a mobile lifestyle. The most common evidence for Mesolithic activity comprises of scatters of worked flint material; a by-product from the production of flint implements or rubbish middens consisting largely of shells (Stout and Stout 1997). The latter are commonly discovered in coastal regions or at the edge of lakes and a number of shell middens and flint scatters are located along the coast from Sutton and Malahide to Balbriggan, notably at Barnageeragh, c. 22km to the northeast (Baker 2010); at Lambay Island, c. 26km northeast (Dolan and Cooney 2010) and from the estuarine silts at Spencer Dock in Dublin City 4.9km to the south (McQuade and O' Donnell 2007). There are no recorded Mesolithic sites from the immediate vicinity of the proposed development.

##### Neolithic Period (4000–2500 BC)

- 13.23 During the Neolithic period communities became less mobile and their economy became based on the rearing of stock and cereal cultivation. This transition was accompanied by major social change. Agriculture demanded an altering of the physical landscape; forests were rapidly cleared and field boundaries constructed. There was

a greater concern for territory, which saw the construction of large communal ritual monuments called megalithic tombs which are characteristic of the period, as are Neolithic houses, which were typically large, rectangular, timber-built monuments (Hofmann and Smyth 2013). A polished stone axehead dating from the Neolithic period was uncovered during excavations in Santry Demesne, to the north of the proposed development area, in 1947. The exact location of the find is not recorded, the closest boundary of Santry Demesne however lies c. 290m to the north.

#### Bronze Age (2500–800 BC)

- 13.24 The Bronze Age was characterised by the introduction of metalworking technology to Ireland and coincides with many changes in the archaeological record, both in terms of material culture as well as the nature of the sites and monuments themselves. Though this activity has markedly different characteristics to that of the preceding Neolithic period, including new structural forms and new artefacts (such as Beaker pottery), it also reflects a degree of continuity. The most common Bronze Age site within the archaeological record is the burnt mound or *fulacht fiadh*. Numerous *fulachta fiadh* are recorded within North Dublin, often found close to low-lying marshy areas or adjacent to streams or rivers. No examples are however recorded in the vicinity of the proposed development area.

#### Iron Age (800 BC–AD 500)

- 13.25 Until recently, the dearth of evidence representing the Irish Iron Age made it one of the more enigmatic and least understood periods in Irish prehistory. However, large scale commercial excavations carried out over the past two decades have produced large quantities of new data relating to Iron Age settlement and industry across the country.
- 13.26 As in Europe, two phases of the Iron Age have been proposed in Ireland; the Hallstatt and the La Tène (Raftery 1994). The Hallstatt period generally dates from 700 BC onwards and spread rapidly from Austria, across Europe, and then into Ireland. The later Iron Age or La Tène culture also originated in Europe during the middle of the 5th century BC. While evidence of the Hallstatt period was traditionally viewed as rare in Ireland, La Tène influences are clear in the Irish metalwork of the period.
- 13.27 Despite the relative paucity of evidence for the period in Ireland, the Fingal coastline is one of the most interesting areas in Ireland in terms of Iron Age material. The Discovery Programme's Late Iron Age and Roman Ireland (LIARI) project has identified a concentration of possible Iron Age monuments along the coastline at Rush, c. 19km northeast of the proposed development area. There are no recorded Iron Age sites in the immediate vicinity of the proposed development.

#### 13.4.1.2 Early Medieval Period (AD500-1100)

- 13.28 During this period, Ireland is depicted in the surviving sources as entirely rural. The Santry landscape was located within the Kingdom of Brega, which would have been sub-divided into smaller territorial units, known as *túath* (Stout 1997). Secular habitation sites in the early medieval period include crannógs, cashels and ringforts in addition to unenclosed settlements which are more difficult to identify in the archaeological record. The ringfort or rath is considered to be the most common indicator of settlement during the early medieval period. Ringforts are strongly associated with agricultural land and, as such, are rarely situated at higher altitudes. A number of enclosures, which may represent ringforts are located in the wider vicinity

of the proposed development area, in particular in the townland of Balcurris to the west, though none are recorded within a 250m radius.

- 13.29 This period is characterised by the foundation of a large number of ecclesiastical sites throughout Ireland during the centuries following the introduction of Christianity in the 5th century AD. These early churches tended to be constructed of wood or post-and-wattle, replaced by the late 8th and 10th centuries with mortared stone churches. Many of the sites, some of which were monastic foundations, were likely originally defined by an enclosing wall or bank similar to that found at the coeval secular sites. There is evidence that St. Pappan's Church (DU014-057001), recorded c. 280m northeast of the proposed development area, is located on the site of an earlier medieval church that itself succeeded a 6th century church associated with St. Pappan. The ecclesiastical enclosure (DU014-057005) recorded around the present church suggests an early medieval date for the site.

#### 13.4.1.3 Medieval Period (AD 1100–1600)

- 13.30 The beginning of the medieval period is characterised by political unrest that originated from the death of Brian Borumha in 1014. Diarmait MacMurchadha, deposed King of Leinster, sought the support of mercenaries from England, Wales and Flanders to assist him in his challenge for kingship. Norman involvement in Ireland began in 1169, when Richard de Clare and his followers landed in Wexford to support MacMurchadha. Two years later de Clare (colloquially known as Strongbow) inherited the Kingdom of Leinster and by the end of the 12th century the Normans had succeeded in conquering much of the country (Stout & Stout, 1997, 53). The initial stage of the invasion of the country was marked by the construction of Motte and Bailey castles, followed at a later stage by the masonry castles traditionally associated with the Anglo-Normans.
- 13.31 Hugh de Lacy granted the lands of Santry to his baron, Adam de Phepoe. He constructed a church in the late 12th century, which was held by St. Mary's Abbey of Dublin until the dissolution of the monasteries in the 16th century. A font (DU014-057003) is recorded within the modern-day St. Pappan's church. It remains the only surviving medieval element of the church. A medieval manor was located at Santry, c. 630m to the north, and consisted of hall and chambers, with stables, bakery, orchards and forestry ([www.archaeology.ie/SMR](http://www.archaeology.ie/SMR) file).

#### 13.4.1.4 Post-Medieval Period (AD 1600–1800)

- 13.32 The 17th century saw dramatic rise in the establishment of large residential houses around the country. The large country house was only a small part of the overall estate of a large landowner and provided a base to manage often large areas of land that could be located nationwide. Lands associated with the large houses were generally turned over to formal gardens, which were much the style of continental Europe. By the mid-18th century more natural parkland landscapes were in favour, although the creation of these required considerable effort, including moving earth, removal of field boundaries, culverting streams to form lakes and quite often roads were completely diverted to avoid travelling anywhere near the main house or across the estate.
- 13.33 The site of Santry Court (DU014-030) is located c. 630m to the north of the proposed development area, the edge of the associated demesne, c. 290m to the north. The house was built by the Barry family in 1703 on the site of the earlier medieval manor of Santry. Sir Charles Compton William Domville embarked on renovating Santry Court in 1857. When the Domville family failed to produce a male heir in the early 20th century, the estate passed to the nephew of Sir Compton Domville, Sir Hugh Poe. The



house was acquired by Dublin Corporation in the early 1930s. The house burned down in 1941 and was demolished in 1959.

- 13.34 The proposed development area itself lies largely within the former demesne of Santry Hall, which is shown on John Rocques 1760 map and still visible on the 1907 OS maps. The principal building of Santry hall lay outside the proposed development area, on the site now occupied by commercial development. Nothing of the original demesne survives today.

### 13.4.2 Summary of Previous Archaeological Fieldwork

- 13.35 A review of the Excavations Bulletin (1970–2022) revealed that there have been four previous archaeological investigations within 250m of the proposed development, three of which revealed nothing of archaeological significance (Table 13.1). A programme of archaeological monitoring and excavation to the rear of numbers 5-7 Schoolhouse Lane, c. 200m northeast of the proposed development area (McQuade 2003, Licence Ref.:03E0353), revealed linear features associated with medieval cultivation including a possible field boundary, as well as similar features of a post-medieval date.

Table 13.1 *Investigations of no Archaeological Significance*

Licence No.	Reference	Distance from development
17E0545	Bennett 2017:512	c. 240m northeast
02E1516	Bennett 2002:0463	c. 50m north
06E0436	Bennett 2006:698	c. 210m northeast

### 13.4.3 Cartographic Analysis

#### 13.4.3.1 William Petty's Down Survey Map, Barony of Coolock, Parish of Santry, c. 1655

- 13.36 The parish of Santry, within the barony of Coolock can be located on this mapping. Some of the townlands north of the proposed development, including Collinstown, Coultry, Dardistown, and Ballymun, are annotated; however, there are no details depicted for this parish.

#### 13.4.3.2 John Rocque's Map of the City and County of Dublin, 1760 (Figure 13.3)

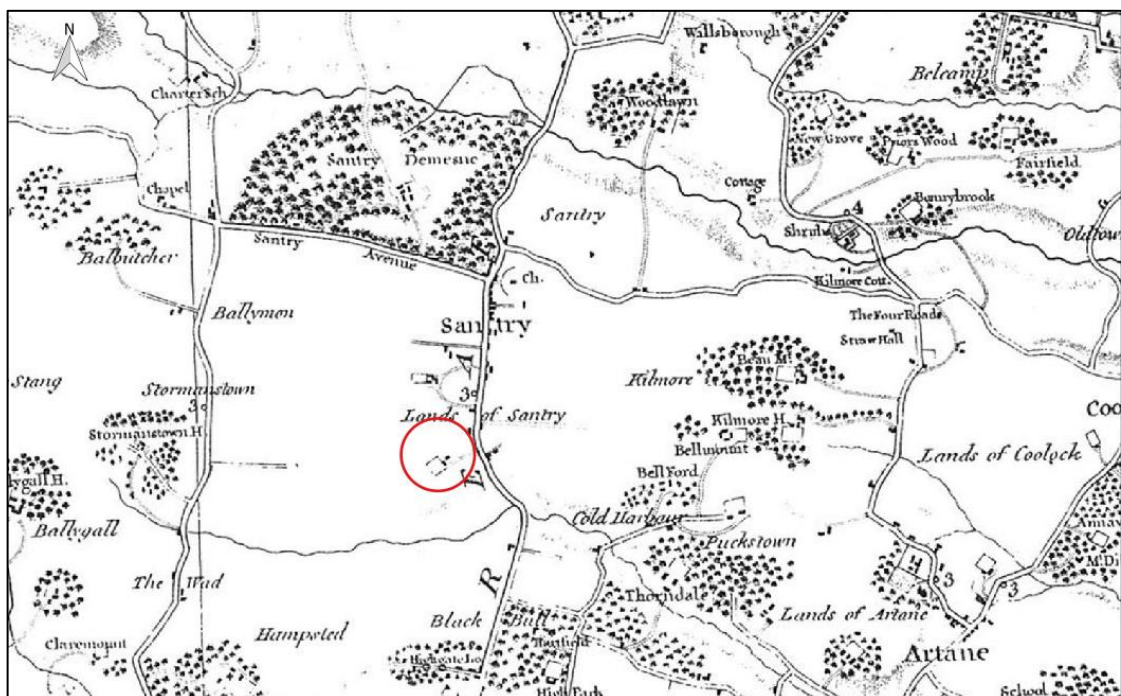
- 13.37 On Rocque's map the proposed development area is situated to the east of a road corresponding to the present-day Swords Road, leading north from the city. It is shown to the south of Santry House and its ornate gardens and a laneway marked 'Santry Avenue'. 'Santry Avenue' leads along the southern limit of the demesne of Santry House, from Swords Road to the Old Ballymun Road to the west. Santry village, which contains Santry Church, Santry Grove, and other structures is depicted. 'Santry Grove', is the demesne later marked 'Santry Hall', which the proposed development area occupies. A further house and demesne, 'Stormanstown', is depicted to the west of Santry Grove. The layout of the demesnes and gardens is relatively formal, in contrast to the layout as shown on later maps and this reflect the change in taste with regard to parks and demesnes that occurred in the later part of the 18th century. A watercourse is shown passing south of the proposed development area.

### 13.4.3.3 John Taylor's Map of the Environs of Dublin, 1816 (Figure 13.4)

- 13.38 Taylor's map depicts the proposed development area and its surroundings much as Rocque's does, with less detail but overall, more clarity. The area of the proposed development is marked 'Lands of Santry', to the south of Santry itself.



**Figure 13.3** Extract from John Rocque's Map of the City and County of Dublin (1760) showing the approximate location of the proposed development



**Figure 13.4** Extract from John Taylor's Map of the Environs of Dublin (1816) showing the approximate location of the proposed development

#### 13.4.3.4 First Edition Ordnance Survey Map, 1837, scale 1: 10,560 (Figure 13.5)

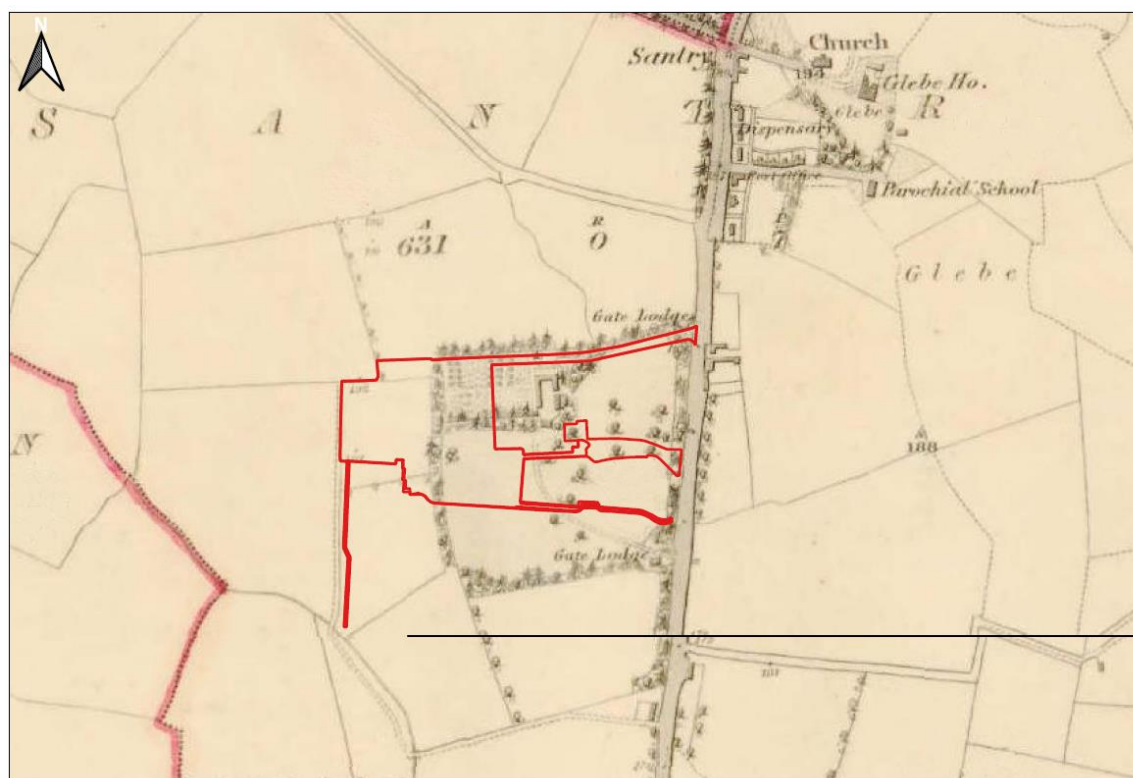
- 13.39 This is the first accurately scaled historic mapping of the area containing the proposed development. The village of Santry, north of the proposed development, and the house and demesne of Santry Hall, within the proposed development area, are both now shown in detail. The demesne consists of a formal garden in its northwest corner, with more open parkland characterising the remainder. Two gate lodges are marked in the northeast and southeast corners. A portion of the formal garden and a portion of the parkland make up the eastern half of the main area of the proposed development. Open fields surround the demesne, and another house is depicted on the opposite side of Swords Road, although it is not labelled.

#### 13.4.3.5 Second Edition Ordnance Survey Map, 1871, scale 1: 10,560

- 13.40 There are no major changes to note within the cartography of this map that relate to the proposed development area.

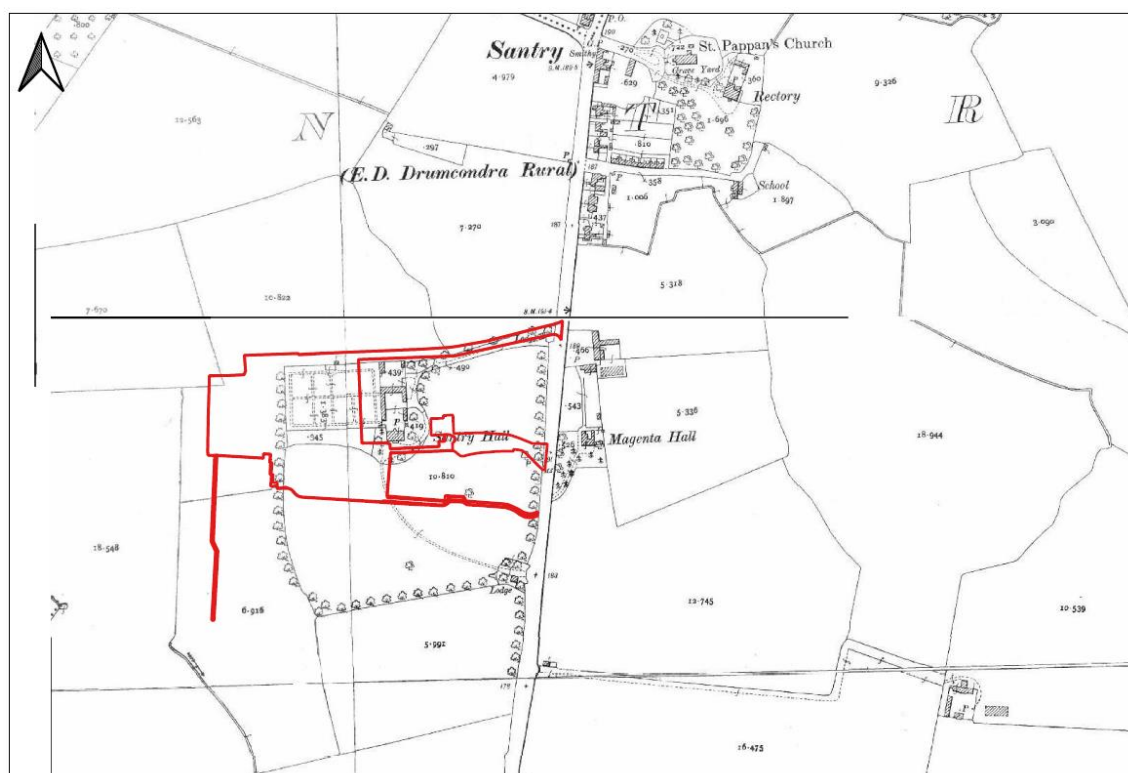
#### 13.4.3.6 Ordnance Survey Map, 1907, scale 1: 2,500 (Figure 1.6)

- 13.41 By the time of this map there has been slight expansions to buildings in Santry. The house and demesne of Santry Hall (labelled as such for the first time), within the proposed development are now shown in further detail, the layout remaining largely the same. On the far side of Swords Road, the house depicted on the 1837 map remains and a second house has appeared to the south, labelled 'Magenta Hall'.



**Figure 13.5** Extract from the First Edition 6-inch OS map (1837) showing the proposed development area





**Figure 13.6** Extract from Ordnance Survey Map, (1907) showing the proposed development area

#### 13.4.3.7 Geographic Section, General Staff (GSGS) Map, 1942, scale 1: 2,500

- 13.42 Santry Lodge (Santry Hall) and its demesne is still marked within this map, although less detail is depicted. An inn is marked at the location of the north-eastern gate lodge.

### **13.4.4 City Development Plan**

#### 13.4.4.1 Recorded Monuments

- 13.43 The Dublin City Development Plan (2016-2022) and draft development plan (2022-2028), recognise the statutory protection afforded to all Record of Monuments and Places (RMP) sites under the National Monuments Legislation (1930–2014). The development plan lists a number of aims and objectives in relation to archaeological heritage (Appendix 13.1). It is a policy of the Development Plan to promote the in-situ preservation of archaeology as the preferred option where development would have an impact on buried artefacts. Where other alternatives are acceptable or exceptional circumstances are determined by the relevant statutory agencies. Where preservation in-situ is not feasible, sites of archaeological interest shall be subject to archaeological investigations and recording according to best practice, in advance of redevelopment.

- 13.44 There are no recorded archaeological sites within 250m of the proposed development.

#### 13.4.4.2 Protected Structures

- 13.45 The development plan notes protected structures in the wider vicinity of the proposed development area. The RMP site of St. Pappan's Church is recorded as a Protected

Structure (RPS 1517), though the actual building lies outside the 250m study area around the proposed development.

- 13.46 No structures within a 250m radius of the proposed development area are listed in the Record of Protected Structures.

#### 13.4.4.3 Architectural Conservation Areas

- 13.47 The development plan defines Architectural Conservation Areas (ACAs) “in recognition of their special interest or unique historic and architectural character and important contribution to the heritage of the city. The special interest/value of Conservation Areas lies in the historic and architectural interest and the design and scale of these areas.”

- 13.48 There are no ACAs within the study area of the proposed development.

### **13.4.5 National Inventory of Architectural Heritage**

#### 13.4.5.1 Building Survey

- 13.49 There are no structures recorded by the survey that are recorded within 250m of the proposed development.

#### 13.4.5.2 Garden Survey

- 13.50 The proposed development lies partially within a former demesne landscape associated with Santry Hall, which is included on the NIAH Garden Survey (as Santry Lodge, Survey ID: 2386). The landscape is visible on historic mapping from at least 1760 but no remains of the demesne or house survive above ground today, given that the area has been subject to modern development.

### **13.4.6 Cultural Heritage Background**

#### 13.4.6.1 Toponymy of townlands

- 13.51 Townland and topographic names are an invaluable source of information on topography, land ownership and land use within the landscape. They also provide information on history; archaeological monuments and folklore of an area. A place name may refer to a long-forgotten site, and may indicate the possibility that the remains of certain sites may still survive below the ground surface. The Ordnance Survey surveyors wrote down townland names in the 1830's and 1840's, when the entire country was mapped for the first time. Some of the townland names in the study area are of Irish origin and through time have been anglicised. A description and possible explanation of each townland name in the environs of the proposed development area are provided in Table 13.2.

*Table 13.2 Toponymy of local townlands*

Placename	Derivation	Possible Meaning
Santry	<i>Seantrabh</i>	Old tribe
Stormanstown	<i>Bhaile Stoirmín</i>	Townland/homestead of <i>Stoirmín</i> (family name)



#### **13.4.6.2 Townland Boundaries**

- 13.52 The townland is an Irish land unit of considerable longevity as many of the units are likely to represent much earlier land divisions. However, the term townland was not used to denote a unit of land until the Civil Survey of 1654. It bears no relation to the modern word 'town' but like the Irish word baile refers to a place. It is possible that the word is derived from the Old English tun land and meant 'the land forming an estate or manor' (Culleton 1999, 174).
- 13.53 Gaelic land ownership required a clear definition of the territories held by each sept and a need for strong, permanent fences around their territories. It is possible that boundaries following ridge tops, streams or bog are more likely to be older in date than those composed of straight lines (ibid. 179).
- 13.54 The vast majority of townlands are referred to in the 17th century, when land documentation records begin. Many of the townlands are mapped within the Down Survey of the 1650s, so called as all measurements were carefully 'laid downe' on paper at a scale of forty perches to one inch. Therefore, most are in the context of pre-17th century landscape organisation (McErlean 1983, 315).
- 13.55 In the 19th century, some demesnes, deer parks or large farms were given townland status during the Ordnance Survey and some imprecise townland boundaries in areas such as bogs or lakes, were given more precise definition (ibid.). Larger tracks of land were divided into a number of townlands, and named Upper, Middle or Lower, as well as Beg and More (small and large) and north, east, south and west (Culleton 1999, 179). By the time the first Ordnance Survey had been completed a total of 62,000 townlands were recorded in Ireland.
- 13.56 The only townland boundary within 250m of the proposed development is that between Santry and Stormanstown, c. 175m to the southwest. It is visible on the first edition (1837) OS mapping, matching its current form.

#### **13.4.7 Aerial Photographic Analysis**

- 13.57 A review of aerial photography held by OSI (1995-2013), Google Earth (2009-2020) and Bing Maps revealed the proposed development area has remained largely unchanged since 1995, the only exceptions being the demolition of the building immediately east of the main section of the proposed development and its replacement with the current Lidl building in 2014-15 and the construction of the buildings east of this (Maxi Zoo etc) in 2017. No previously unknown features of archaeological potential were identified due to the fully developed nature of the site.

#### **13.4.8 Topographical Files of the National Museum of Ireland**

- 13.58 Information on artefact finds from the study area in County Dublin have been recorded by the National Museum of Ireland since the late 18th century. Location information relating to these finds is important in establishing prehistoric and historic activity in the study area. The Topographical Files of the National Museum of Ireland record no findspots within 250m of the proposed development.

#### **13.4.9 Field Inspection**

- 13.59 The field inspection sought to assess the site, its previous and current land use, the topography and any additional information relevant to the report. During the course of

the field investigation the proposed development site and its surrounding environs were inspected.

- 13.60 The main section of the site is occupied by two large industrial buildings (Plates 13.1, 13.2), two smaller ancillary buildings and a car park associated with the Omni Shopping Centre (Plate 13.3), separated from each other by a wall and large hedge.



**Plate 13.1** South side of industrial buildings occupying northern half of the main portion of the proposed development area, facing west



**Plate 13.2** *East side of industrial buildings occupying northern half of the main portion of the proposed development area, facing north*



**Plate 13.3** *Car park occupying southern half of the main portion of the proposed development area, facing northeast*

- 13.61 The southern two off-shoots to the east lie within roadways and parking areas also associated with the shopping centre, whilst the northernmost off-shoot lies along the access road to the Santry Hall Industrial Estate (Plate 13.4). The westernmost portion of the site comprises an open parking area.



**Plate 13.4** *Roadway accessing the industrial estate along northern side of the proposed development area, facing west*

- 13.62 The inspection confirmed the findings of the desk-based assessment, with no upstanding remains associated with the former Santry Hall/Lodge and demesne being present. No previously unknown features of archaeological, architectural or cultural heritage potential were identified due to the level of modern development on site.

#### **13.4.10 Conclusions**

- 13.63 The proposed development comprises a fully developed site occupied by industrial buildings, roadways and car parking areas in the townland of Santry.
- 13.64 There are no recorded monuments, protected structures or NIAH structures located within the study area of 250m. The development area partially occupies the former demesne landscape of Santry Hall/Santry Lodge, which is visible from Rocque's map of 1760 onwards. Sometime during the latter half of the 20th century the house and demesne were demolished and redeveloped. The site of the principal structure of Santry Hall/Lodge is located outside the area of the proposed development, although the main section of the development occupies part of the site of the formal gardens. No trace of the demesne or any associated features survive within the landscape today.
- 13.65 A review of the Excavations Bulletin (1970–2020) has revealed that only one previous archaeological investigation carried out within 250m of the proposed development revealed anything of archaeological significance. This took place c. 200m to the northeast and uncovered features associated with medieval cultivation. Three further investigations within the vicinity revealed nothing of significance.
- 13.66 Analysis of aerial photography revealed no changes to the area of the proposed development since the mid-1990s and little change to the surrounding area. A field inspection confirmed the findings of the desk-based survey, revealing no upstanding remains associated with Santry Hall/Lodge or its demesne. Due to the level of modern development within the site, no previously unrecorded features of archaeological potential, or structures of architectural heritage merit, were noted.

### **13.5 POTENTIAL IMPACTS OF THE PROPOSED DEVELOPMENT**

#### **13.5.1 Do Nothing Scenario**

- 13.67 If the proposed development were not to proceed there would be no negative impact on the archaeological, architectural or cultural heritage resource.

#### **13.5.2 Construction Phase**

- 13.68 The proposed development area has been subject to large scale modern disturbance. It is highly likely that any archaeological features that may have been located within the development area have since been removed. As such, no negative impacts upon the archaeological heritage resource are predicted as a result of the construction of the proposed development.



- 13.69 No sites of specific architectural or cultural heritage significance have been identified in or within the study area of the proposed development. As such, no negative impacts upon the architectural or cultural heritage resource are predicted as a result of the construction of the proposed development.

### 13.5.3 Operational Phase

- 13.70 No sites of archaeological, architectural or cultural heritage significance have been identified in or within the study area of the proposed development. As such, no negative impacts upon the archaeological, architectural or cultural heritage resource are predicted as a result of the operation of the proposed development.

### 13.5.4 Cumulative Impact

- 13.71 No potential construction or operation impacts have been identified upon the archaeological, architectural or cultural heritage resource, as a result of the proposed development going ahead. As such, when considered cumulatively in relation to surrounding potential or permitted developments (Chapter 3), no cumulative negative impacts upon the archaeological, architectural and cultural heritage resource have been identified.

## 13.6 REMEDIAL AND MITIGATION MEASURES

### 13.6.1 Construction Phase

- 13.72 No mitigation is required in relation to the archaeological, architectural and cultural heritage resource.

### 13.6.2 Operational Phase

- 13.73 No mitigation is required in relation to the archaeological, architectural and cultural heritage resource.

## 13.7 RESIDUAL IMPACTS OF THE PROPOSED DEVELOPMENT

- 13.74 No residual impacts are predicted upon the archaeological, architectural or cultural heritage resource.

## 13.8 MONITORING OR REINSTATEMENT

- 13.75 Not applicable.

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## **CARTOGRAPHIC SOURCES**

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John Rocque, *Map of the City and County of Dublin*, 1760

John Taylor, *Map of the environs of Dublin*, 1816

Ordnance Survey maps of County Dublin, 1837-1907

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## **ELECTRONIC SOURCES**

[www.excavations.ie](http://www.excavations.ie) – Summary of archaeological excavation from 1970–2022.

[www.archaeology.ie](http://www.archaeology.ie) – DoHLGH website listing all SMR/RMP sites.

[www.osiemaps.ie](http://www.osiemaps.ie) – Ordnance Survey aerial photographs dating to 1995-2013 and 6-inch/25-inch OS maps.

[www.heritagemaps.ie](http://www.heritagemaps.ie) – The Heritage Council web-based spatial data viewer which focuses on the built, cultural and natural heritage.

[www.googleearth.com](http://www.googleearth.com) – Satellite imagery of the proposed development area.

[www.bingmaps.com](http://www.bingmaps.com) – Satellite imagery of the proposed development area.

[www.logainm.ie](http://www.logainm.ie) –Placenames Database of Ireland launched by *Fiontar agus Scoil na Gaelige* and the DoCHG.

## **APPENDIX 13.1      LEGISLATION PROTECTING THE ARCHAEOLOGICAL RESOURCE**

### **PROTECTION OF CULTURAL HERITAGE**

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 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.

### **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 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 Culture, Heritage and the Gaeltacht) 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 case of urgent necessity and with the consent of the Minister, commence the work until two months after 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.

### **Dublin City Development Plan 2016-2022**

### **It is the Policy of Dublin City Council**

CHC9: To protect and preserve National Monuments.

- 1) To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of the re-use of buildings, light buildings, foundation design or the omission of basements in the Zones of Archaeological Interest.
- 2) That where preservation in situ is not feasible, sites of archaeological interest shall be subject to 'preservation by record' according to best practice in advance of re-development.
- 3) That sites within Zones of Archaeological Interest will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.
- 4) That the National Monuments Service will be consulted in assessing proposals for development which relate to Monuments and Zones of Archaeological Interest.
- 5) To preserve known burial grounds and disused historic graveyards, where appropriate, to ensure that human remain are re-interred, except where otherwise agreed with the National Museum of Ireland.
- 6) That in evaluating proposals for development in the vicinity of the surviving sections of the city wall that due recognition be given to their national significance and their special character.
- 7) To have regard to the Shipwreck inventory maintained by the DAHG. Proposed developments that may have potential to impact on riverine, inter-tidal and sub-tidal environments shall be subject to an underwater archaeological assessment in advance of works.
- 8) To have regard to DAHG policy documents and guidelines relating to archaeology.

### **It is an objective of Dublin City Council: -**

CHCO10: -

- 1) To implement the archaeological actions of the Dublin City Heritage Plan 2002-6 in light of the Dublin City Heritage Plan Review 2012.
- 2) To prepare and implement conservation plans for National Monuments and Monuments in DCC care (City Walls, St Luke's Church, St James's Graveyard, St. Thomas's Abbey, St Canice's Graveyard etc).
- 3) To maintain, develop and promote the Dublin City Archaeological Archive (DCAA) at Pearse Street Library and Archives.
- 4) To ensure the public dissemination of the findings of licensed archaeological activity in Dublin through the Dublin County Archaeology GIS.



- 5) To develop a long-term management plan to promote the conservation, management and interpretation of archaeological sites and monuments and to identify areas for strategic research.
- 6) To have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCIHR) in the preparation of Local Area Plans (LAPs) and the assessment of planning applications and to publish the DCIHR online. To review the DCIHR in accordance with Ministerial recommendations arising from the national Inventory of Architectural Heritage (NIAH) survey of Dublin City and in accordance with the Strategic Approach set out in Section 11.1.4 of this Chapter
- 7) To promote awareness of, and access to, the city's archaeological inheritance and foster high-quality public archaeology.
- 8) To promote archaeological best practice in Dublin city.
- 9) To promote the awareness of the international significance of Viking Dublin and to support post-excavation research into the Wood Quay excavations 1962-81.
- 10) To develop a strategy for the former Civic Museum collection and for other collections of civic interest and importance.
- 11) To investigate the potential for the erection of Columbarium Walls.
- 12) To support the implementation of the Kilmainham Mill Conservation Plan.
- 13) Dublin City Council will seek to work with Diageo to undertake a more comprehensive industrial heritage survey of the constituent historic buildings within the Guinness Brewery complex at Saint James's Gate.
- 14) To implement and promote The Dublin Principles (ICOMOS, 2011) as guiding principles to assist in the documentation, protection, conservation and appreciation of industrial heritage as part of the heritage of Dublin and Ireland.
- 15) To continue to implement actions of the Saint Luke's Conservation Plan on the basis of funds available to conserve the monument, recover the graveyard, provide visitor access, improve visual amenity and secure an appropriate new use.

### **Dublin City Development Plan 2022-2028 (draft)**

#### **It is a policy of Dublin City Council:**

##### **BHA26 Archaeological Heritage**

1. To protect and preserve Sites and Zones of Archaeological interest which have been identified in the Record of Monuments and Places and the Historic Environment Viewer ([www.archaeology.ie](http://www.archaeology.ie)).
2. To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of re-use of standing buildings, the construction of light buildings, low impact foundation design, or the omission of basements (except in exceptional circumstances) in the Zones of Archaeological Interest.

3. To seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places, and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the Council will have regard to the advice and/or recommendations of the Department of Housing, Heritage and Local Government.
4. Development proposals within Sites and Zones of Archaeological Interest, of sites over 0.5 hectares size and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.
5. To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.
6. Preserve the character, setting and amenity of upstanding and below ground town wall defences.
7. Development proposals in marine, lacustrine and riverine environments and areas of reclaimed land shall have regard to the Shipwreck Inventory maintained by the Department of Culture, Heritage and the Gaeltacht and be subject to an appropriate level of archaeological assessment.
8. To have regard to national policy documents and guidelines relating to archaeology and to best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland.

## APPENDIX 13.2 RESOURCE

## LEGISLATION PROTECTING THE ARCHITECTURAL

The main laws protecting the built heritage are the *Architectural Heritage (National Inventory) and National Monuments (Miscellaneous Provisions) Act 1999* and the *Local Government (Planning and Development) Acts 1963–1999*, which has now been superseded by the *Planning and Development Act, 2000*. The Architectural Heritage Act requires the Minister to establish a survey to identify, record and assess the architectural heritage of the country. The background to this legislation derives from Article 2 of the 1985 Convention for the Protection of Architectural Heritage (Granada Convention). This states that:

*For the purpose of precise identification of the monuments, groups of structures and sites to be protected, each member state will undertake to maintain inventories of that architectural heritage.*

The National Inventory of Architectural Heritage (NIAH) was established in 1990 to fulfil Ireland's obligation under the Granada Convention, through the establishment and maintenance of a central record, documenting and evaluating the architecture of Ireland (NIAH Handbook 2005:2). As inclusion in the inventory does not provide statutory protection, the survey information is used in conjunction with the *Architectural Heritage Protection Guidelines for Planning Authorities* to advise local authorities on compilation of a Record of Protected Structures as required by the *Planning and Development Act, 2000*.

### PROTECTION UNDER THE RECORD OF PROTECTED STRUCTURES AND COUNTY DEVELOPMENT PLAN

Structures of architectural, cultural, social, scientific, historical, technical or archaeological interest can be protected under the Planning and Development Act, 2000, where the conditions relating to the protection of the architectural heritage are set out in Part IV of the act. This act superseded the Local Government (Planning and Development) Act, 1999, and came into force on 1st January 2000.

The act provides for the inclusion of Protected Structures into the planning authorities' development plans and sets out statutory regulations regarding works affecting such structures. Under new legislation, no distinction is made between buildings formerly classified under development plans as List 1 and List 2. Such buildings are now all regarded as 'Protected Structures' and enjoy equal statutory protection. Under the act the entire structure is protected, including a structure's interior, exterior, attendant grounds and also any structures within the attendant grounds.

The act defines a Protected Structure as (a) a structure, or (b) a specified part of a structure which is included in a Record of Protected Structures (RPS), and, where that record so indicates, includes any specified feature which is in the attendant grounds of the structure and which would not otherwise be included in this definition. Protection of the structure, or part thereof, includes conservation, preservation, and improvement compatible with maintaining its character and interest. Part IV of the act deals with architectural heritage, and Section 57 deals specifically with works affecting the character of Protected Structures or proposed Protected Structures and states that no works should materially affect the character of the structure or any element of the structure that contributes to its special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The act does not provide specific criteria for assigning a special interest to a structure. However, the National Inventory of

Architectural Heritage (NIAH) offers guidelines to its field workers as to how to designate a building with a special interest, which are not mutually exclusive. This offers guidance by example rather than by definition:

## ARCHAEOLOGICAL

It is to be noted that the NIAH is biased towards post-1700 structures. Structures that have archaeological features may be recorded, providing the archaeological features are incorporated within post-1700 elements. Industrial fabric is considered to have technical significance, and should only be attributed archaeological significance if the structure has pre-1700 features.

## ARCHITECTURAL

A structure may be considered of special architectural interest under the following criteria:

- Good quality or well executed architectural design
- The work of a known and distinguished architect, engineer, designer, craftsman
- A structure that makes a positive contribution to a setting, such as a streetscape or rural setting
- Modest or vernacular structures may be considered to be of architectural interest, as they are part of the history of the built heritage of Ireland.
- Well-designed decorative features, externally and/or internally

## HISTORICAL

A structure may be considered of special historical interest under the following criteria:

- A significant historical event associated with the structure
- An association with a significant historical figure
- Has a known interesting and/or unusual change of use, e.g. a former workhouse now in use as a hotel
- A memorial to a historical event.

## TECHNICAL

A structure may be considered of special technical interest under the following criteria:

- Incorporates building materials of particular interest, i.e. the materials or the technology used for construction
- It is the work of a known or distinguished engineer
- Incorporates innovative engineering design, e.g. bridges, canals or mill weirs
- A structure which has an architectural interest may also merit a technical interest due to the structural techniques used in its construction, e.g. a curvilinear glasshouse, early use of concrete, cast-iron prefabrication.
- Mechanical fixtures relating to a structure may be considered of technical significance.

## CULTURAL

A structure may be considered of special cultural interest under the following criteria:

- An association with a known fictitious character or event, e.g. Sandycove Martello Tower, which featured in Ulysses.
- Other structure that illustrate the development of society, such as early schoolhouses, swimming baths or printworks.

## SCIENTIFIC

A structure may be considered of special scientific interest under the following criteria:

- A structure or place which is considered to be an extraordinary or pioneering scientific or technical achievement in the Irish context, e.g. Mizen Head Bridge, Birr Telescope.

## SOCIAL

A structure may be considered of special social interest under the following criteria:

- A focal point of spiritual, political, national or other cultural sentiment to a group of people, e.g. a place of worship, a meeting point, assembly rooms.
- Developed or constructed by a community or organisation, e.g. the construction of the railways or the building of a church through the patronage of the local community
- Illustrates a particular lifestyle, philosophy, or social condition of the past, e.g. the hierarchical accommodation in a country house, philanthropic housing, vernacular structures.

## ARTISTIC

A structure may be considered of special artistic interest under the following criteria:

- Work of a skilled craftsman or artist, e.g. plasterwork, wrought-iron work, carved elements or details, stained glass, stations of the cross.
- Well-designed mass-produced structures or elements may also be considered of artistic interest.

(From the NIAH Handbook 2003 & 2005 pages 15–20)

The Local Authority has the power to order conservation and restoration works to be undertaken by the owner of the protected structure if it considers the building to need repair. Similarly, an owner or developer must make a written request to the Local Authority to carry out any works on a protected structure and its environs, which will



be reviewed within three months of application. Failure to do so may result in prosecution.

### **Dublin City Council Development Plan 2016-2022**

#### **It is the policy of Dublin City Council: -**

CHC1: To seek the preservation of the built heritage of the city that makes a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the city.

CHC2: To ensure that the special interest of protected structures is protected. Development will conserve and enhance Protected Structures and their curtilage and will:

- a) Protect or, where appropriate, restore form, features and fabric which contribute to the special interest
- b) Incorporate high standards of craftsmanship and relate sensitively to the scale, proportions, design, period and architectural detail of the original building, using traditional materials in most circumstances
- c) Be highly sensitive to the historic fabric and special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials
- d) Not cause harm to the curtilage of the structure; therefore, the design, form, scale, height, proportions, siting and materials of new development should relate to and complement the special character of the protected structure
- e) Protect architectural items of interest from damage or theft while buildings are empty or during course of works
- f) Have regard to ecological considerations for example, protection of species such as bats.

Changes of use of protected structures, which will have no detrimental impact on the special interest and are compatible with their future long-term conservation, will be promoted.

CHC3: To identify and protect exceptional buildings of the late twentieth century; to categorise, prioritise and, where appropriate, add to the RPS. Dublin City Council will produce guidelines and offer advice for protection and appropriate refurbishment.

CHC4: To protect the special interest and character of all Dublin's Conservation Areas. Development within or affecting a conservation area must contribute positively to its

character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.

Enhancement opportunities may include: -

- 1) Replacement or improvement of any building, feature or element which detracts from the character of the area or its setting.
- 2) Re-instatement of missing architectural detail or other important features.
- 3) Improvement of open spaces and the wider public realm, and re-instatement of historic routes and characteristic plot patterns.
- 4) Contemporary architecture of exceptional design quality, which is in harmony with the Conservation Area.
- 5) The repair and retention of shop- and pub-fronts of architectural interest.

Development will not:-

- 1) Harm buildings, spaces, original street patterns or other features which contribute positively to the special interest of the Conservation Area
- 2) Involve the loss of traditional, historic or important building forms, features, and detailing including roof-scapes, shop-fronts, doors, windows and other decorative detail
- 3) Introduce design details and materials, such as uPVC, aluminium and inappropriately designed or dimensioned timber windows and doors
- 4) Harm the setting of a Conservation Area
- 5) Constitute a visually obtrusive or dominant form.

Changes of use will be acceptable where, in compliance with the zoning objective, they make a positive contribution to the character, function and appearance of Conservation Areas and their settings. The Council will consider the contribution of existing uses to the special interest of an area when assessing change of use applications and will promote compatible uses which ensure future long-term viability.

**It is the objective of Dublin City Council: -**

CHCO1: To undertake a survey and review of the Record of Protected Structures (RPS) within the identified phase 1 priority areas (as set out in Section 11.1.4: The Strategic Approach) of special historic and architectural interest, as part of the ongoing strategic management of the RPS.

CHCO3: To review and consider the recommendations of the National Inventory of Architectural Heritage as part of the conservation strategy to review the Record of Protected Structures and to designate Architectural Conservation Areas within the identified phase 1 priority areas (as set out in Section 11.1.4: The Strategic Approach) of special historic and architectural interest. Consideration will also be given to the inclusion of industrial heritage structures of special interest.

CHCO4: To review the zoning objectives and the red-lined hatched conservation designations as part of the conservation strategy to review the Record of Protected Structures and to designate Architectural Conservation Areas within the identified phase 1 priority areas (as set out in Section 11.1.4: The Strategic Approach) of special historic and architectural interest. Consideration will also be given to the inclusion of industrial heritage structures of special interest.

CHCO5: To continue the compilation of the database of the Record of Protected Structures and Architectural Conservation Areas.

CHCO6: To provide guidance for owners of protected structures or historic buildings on upgrading for energy efficiency and to promote the principles of sustainable building design in conservation.

CHCO7: To maintain a register of Buildings at Risk in which protected structures at risk from neglect or wilful damage will be entered and actions may be taken to ensure their survival.

CHCO8: To prepare schemes for Areas of Special Planning Control, where deemed desirable and appropriate, having regard to statutory needs of the city.

### **Dublin City Development Plan 2022-2028 (draft)**

Multiple policies and objective relating to Record of Protected Structures, NIAH and historic structures not subject to any statutory protection, Architectural Conservation Areas, Conservations Areas, Mews and vernacular structures, modern structures, industrial heritage structures, historic street furniture/ public realm features and the reuse and retro-fitting of historic structures are laid out in detail in Chapter 12 of the draft plan, pages 394-418.

## **APPENDIX 13.3      IMPACT ASSESSMENT AND THE CULTURAL HERITAGE RESOURCE**

### **POTENTIAL IMPACTS ON ARCHAEOLOGICAL AND HISTORICAL REMAINS**

Impacts are defined as ‘the degree of change in an environment resulting from a development’ (Environmental Protection Agency 2017). They are described as profound, significant or slight impacts on archaeological remains. They may be negative, positive or neutral, direct, indirect or cumulative, temporary or permanent.

Impacts can be identified from detailed information about a project, the nature of the area affected and the range of archaeological and historical resources potentially affected. Development can affect the archaeological and historical resource of a given landscape in a number of ways.

- Permanent and temporary land-take, associated structures, landscape mounding, and their construction may result in damage to or loss of archaeological remains and deposits, or physical loss to the setting of historic monuments and to the physical coherence of the landscape.
- 
- Archaeological sites can be affected adversely in a number of ways: disturbance by excavation, topsoil stripping and the passage of heavy machinery; disturbance by vehicles working in unsuitable conditions; or burial of sites, limiting accessibility for future archaeological investigation.
- 
- Hydrological changes in groundwater or surface water levels can result from construction activities such as de-watering and spoil disposal, or longer-term changes in drainage patterns. These may desiccate archaeological remains and associated deposits.
- 
- Visual impacts on the historic landscape sometimes arise from construction traffic and facilities, built earthworks and structures, landscape mounding and planting, noise, fences and associated works. These features can impinge directly on historic monuments and historic landscape elements as well as their visual amenity value.
- 
- Landscape measures such as tree planting can damage sub-surface archaeological features, due to topsoil stripping and through the root action of trees and shrubs as they grow.
- 
- Ground consolidation by construction activities or the weight of permanent embankments can cause damage to buried archaeological remains, especially in colluviums or peat deposits.
- 
- Disruption due to construction also offers in general the potential for adversely affecting archaeological remains. This can include machinery, site offices, and service trenches.

*Although not widely appreciated, positive impacts can accrue from developments. These can include positive resource management policies, improved maintenance and access to archaeological monuments, and the increased level of knowledge of a site or historic landscape as a result of archaeological assessment and fieldwork.*

## PREDICTED IMPACTS

The severity of a given level of land-take or visual intrusion varies with the type of monument, site or landscape features and its existing environment. Severity of impact can be judged taking the following into account:

- The proportion of the feature affected and how far physical characteristics fundamental to the understanding of the feature would be lost;
- 
- Consideration of the type, date, survival/condition, fragility/vulnerability, rarity, potential and amenity value of the feature affected;
- 
- Assessment of the levels of noise, visual and hydrological impacts, either in general or site-specific terms, as may be provided by other specialists.