

An Archaeological, Architectural and Cultural Heritage Impact Assessment of a Proposed Development at Gowan House Carriglea Business Park, Naas Road, Dublin 12, D12 RCC4.

Client: Thornton O'Connor Town Planning on behalf of Malclose Ltd

Date: 10 October 2023

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Planning Reference: N/A

Report Status: Final



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EXECUTIVE SUMMARY

The purpose of this report is to assess the importance and sensitivity of the known, as well as the potential, archaeological, architectural and cultural heritage environment of the proposed development site at Gowan House, Carriglea Business Park, Nass Road, Dublin 12, D12 RCC4, to identify the impact of the proposed development on this environment and to propose mitigation measures to reduce any impacts on said environment.

These works were undertaken for Thornton O'Connor Town Planning on behalf of Malclose Ltd. The proposed development will principally consist of: the demolition of the existing two-storey office/warehouse building and outbuilding (5,172 sq m); and the construction of a development in two blocks (Block 1 (eastern block) is part 2 No. storeys to part 15 No. storeys over lower ground floor and basement levels with roof plant over and Block 2 (western block) is part 9 No. storeys to part 11 No. storeys over basement with roof plant over) principally comprising 941 No. Student Accommodation bedspaces (871 No. standards rooms, 47 No. accessible studio rooms and 23 No. studios) with associated facilities, which will be utilised for short-term lets during student holiday periods. The 871No. standard rooms are provided in 123 No. clusters ranging in size from 3 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.

The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (1,422 sq m internal and 131 sq m external) principally comprising a digital hub and co-working space with ancillary cafe; a retail unit (250 sq m); public open space; the daylighting of the culverted River Camac through the site; an elevated walkway above the River Camac at ground floor level; a pedestrian bridge link at first floor level between Blocks 1 and 2; vehicular access at the south-western corner; the provision of 7 No. car-parking spaces, 2 No. motorcycle parking spaces and 2 No. set down areas; bicycle stores at ground and lower ground floor levels; visitor cycle parking spaces; bin stores; substations; hard and soft landscaping; green and blue roofs; new telecommunications infrastructure at roof level of Block 1 including antennas and microwave link dishes, 18 No. antennas and 6 No. transmission dishes, together with all associated equipment; boundary treatments; plant; lift overruns; and all associated works above and below ground.

The gross floor area of the development is c. 33,140 sq m comprising c. 30,386 sq m above lower ground and basement level.

The archaeological assessment of the proposed development site at Gowan House has identified 32 sites of archaeological, and/or cultural heritage significance within the study area. These comprise five RMPs (two of which are also designated PS sites), seven Protected Structures (PS) (two of which are listed as RMP sites and four are listed on the NIAH), ten NIAH sites (including four Protected Structures), two Conservation Area (CA), one area of archaeological potential (AAP), one townland boundary (TB), six unregistered cultural heritage sites (UCH) and six industrial heritage sites (IH).

The results of this impact assessment indicate that the development site as a whole is an area of archaeological potential. It is expected that any impacts to archaeology would occur as a result of construction groundworks. The following mitigation measures are recommended:

1. The site shall be subject to a programme of pre-construction archaeological test trenching, under licence, by a suitably qualified archaeologist in order to identify the nature, extent and

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location of any sub-surface archaeological material. Note: where possible enabling or other groundworks works should be deferred until after the archaeological test trenching programme has been completed. Any enabling or demolition works that must be carried out prior to completion of the testing programme shall be the subject of a programme of licensed archaeological monitoring by a suitably qualified archaeologist.

2. A report on the results of the test trenching programme shall be submitted to Dublin City Council, the Heritage and Planning Division, Department of Housing, Local Government and Heritage (DHLGH) and the National Museum of Ireland prior to the commencement of the main construction programme. This report will include:
 - a. an updated impact statement of the proposed development on any surviving archaeological material and describe any appropriate further mitigation measures required in the event that the trenching programme confirms the presence of archaeological features or deposits.
3. Any such further mitigation measures required must be agreed in advance with the City Archaeologist (Dublin City Council) and the National Monuments Service (DHLGH).

Note: Where preservation in situ of any identified archaeological remains cannot be achieved, either in whole or in part, then a programme of full archaeological excavation will be required, to ensure the preservation by record of any archaeological features that will be directly impacted upon.

Please note all recommendations are subject to the approval of the Dublin City Archaeologist and the National Monuments Service, Department of Housing, Local Government and Heritage.

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1 INTRODUCTION

This report details the archaeological, architectural and cultural heritage issues that need to be addressed in respect of a proposed development at Gowan House, Carriglea Business Park, Nass Road, Dublin 12, D12 RCC4 (Figure 1). These works were undertaken for Thornton O'Connor Town Planning on behalf of Malclose Ltd.

This assessment has been undertaken in accordance with the provisions of the following legislative procedures which are further detailed in Appendix 3:

- National Monuments Acts 1930-2004
- Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999
- Local Government (Planning and Development) Acts 2000-2015

It has also been undertaken in accordance with the policies set out in Chapter 11 and 15 of the Dublin City Development Plan 2022–2028.

1.1 Site location

The site is bounded to the north-west by the Naas Road and by a number of schemes emerging through planning such as the Concorde Industrial Estate and SouthWest Gate development to the south-west, the Carriglea Industrial Estate development to the south-east. The north-east boundary is comprised of an existing commercial and office building (Figure 1).

1.2 Proposed development

Malclose Limited intend to apply to Dublin City Council for a 7-year permission for a large-scale residential development principally comprising student accommodation at this 0.962 Ha site at Gowan House, Carriglea Business Park, Naas Road, Dublin 12, D12 RCC4.

Works to upgrade of the access road to the west of the site on an area measuring c. 0.081 Ha are also proposed comprising new surfacing to the carriageway, the provision of inbound and outbound bicycle lanes from the development entrance to the Naas Road, the provision of a controlled pedestrian crossing on the access road at the Naas Road junction, and the provision of a further uncontrolled pedestrian and bicycle crossing linking the subject site with the approved Concorde SHD development (ABP Ref: TA29S.312218) to the west.

On the Naas Road, works are proposed on an area measuring c. 0.086 Ha comprising the realignment and widening of the existing pedestrian footpath along the westbound carriageway of the Naas Road and the provision of linkages from the realigned footpath to the development site, and the provision of new controlled pedestrian crossings across the eastbound and westbound carriageways of the Naas Road and the provision of a new uncontrolled crossing of the Luas tracks.

The development site area and roadworks areas will provide a total application site area of c. 1.13 Ha.

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The proposed development will principally consist of: the demolition of the existing two-storey office/warehouse building and outbuilding (5,172 sq m); and the construction of a development in two blocks (Block 1 (eastern block) is part 2 No. storeys to part 15 No. storeys over lower ground floor and basement levels with roof plant over and Block 2 (western block) is part 9 No. storeys to part 11 No. storeys over basement with roof plant over) principally comprising 941 No. Student Accommodation bedspaces (871 No. standards rooms, 47 No. accessible studio rooms and 23 No. studios) with associated facilities, which will be utilised for short-term lets during student holiday periods. The 871No. standard rooms are provided in 123 No. clusters ranging in size from 3 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.

The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (1,422 sq m internal and 131 sq m external) principally comprising a digital hub and co-working space with ancillary cafe; a retail unit (250 sq m); public open space; the daylighting of the culverted River Camac through the site; an elevated walkway above the River Camac at ground floor level; a pedestrian bridge link at first floor level between Blocks 1 and 2; vehicular access at the south-western corner; the provision of 7 No. car-parking spaces, 2 No. motorcycle parking spaces and 2 No. set down areas; bicycle stores at ground and lower ground floor levels; visitor cycle parking spaces; bin stores; substations; hard and soft landscaping; green and blue roofs; new telecommunications infrastructure at roof level of Block 1 including antennas and microwave link dishes, 18 No. antennas and 6 No. transmission dishes, together with all associated equipment; boundary treatments; plant; lift overruns; and all associated works above and below ground.

The gross floor area of the development is c. 33,140 sq m comprising c. 30,386 sq m above lower ground and basement level (Figures 3a–4c).

1.3 Study area

The study area for this assessment has been defined in respect of two factors: 1.) the ability of sites/information sources to provide information pertaining to the archaeological potential of the proposed development site, and 2.) the potential physical impact, as well as impact on setting, that the proposed scheme may have on sites of cultural heritage significance (Figure 2).

Taking these factors into account the study area has been defined as follows:

Subject	Study area
National Monuments and Recorded archaeological monuments (RMPs)	Within 500 m of proposed development site
Protected Structures and/or their curtilage	Within approx. 500 m proposed development site
Architectural Conservation Areas (ACAS)	Within approx. 500 m proposed development site
Structures recorded in the NIAH	Within approx. 500 m of proposed development site
Unregistered features of cultural heritage	Within proposed development site
Townland boundaries	Within proposed development site
Areas of archaeological potential	Within proposed development site
Previous Excavations	Within townlands or streets encompassed by and adjacent to the proposed development site
Topographical files	Within the area incorporated by the proposed development

Table 1 – Dimensions of the study area

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2 OBJECTIVES AND METHODOLOGY

2.1 Objectives

This study aims to assess the baseline archaeological, architectural and cultural heritage environment, evaluate the likely significant impacts that the proposed development will have on this environment and provide mitigation measures, in accordance with the policies of the National Monuments Service, Department of Housing, Local Government and Heritage and Dublin City Council, the National Monuments Acts 1930-2004 and best practise guidelines, to ameliorate these impacts.

In order to provide a comprehensive assessment, an extensive desktop study in addition to a field inspection of the proposed development area was undertaken.

The scope and methodology for the baseline assessment has been devised with reference to the following guidelines:

- EirGrid (2015) 'Cultural Heritage Guidelines for Electricity Transmission Projects. A stand approach to archaeological, architectural and cultural heritage impact assessment of high voltage transmission projects.'
- Environmental Protection Agency (2002) 'Guidelines on the information to be contained in Environmental Impact Statements'
- Environmental Protection Agency (2003) 'Advice notes on current practice (in the preparation of Environmental Impact Statements)'
- Environmental Protection Agency (2017) 'Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)'
- Department of Arts, Heritage, Gaeltacht and the Islands (DAHGI) (1999) 'Frameworks and Principles for the Protection of the Archaeological Heritage'
- Department of the Environment, Heritage and Local Government (2004) 'Architectural Heritage Guidelines'
- National Roads Authority (2005) 'Guidelines for the Assessment of Architectural Heritage Impacts of National Road Schemes'
- National Roads Authority (2005) 'Guidelines for the Assessment of Archaeological Heritage Impacts of National Road Schemes'

2.2 Desktop Study Methodology

The present assessment of the archaeological, architectural and cultural heritage of the proposed development area is based on a desktop study of a number of documentary and cartographic sources. The desktop study was further augmented by an examination of aerial photography as well as a field survey. The main sources consulted in completing the desktop study are listed here.

- Sites and Monuments Record (SMR) and Record of Monuments and Places (RMP)
- National Inventory of Architectural Heritage
- Dublin City Development Plan 2022–2028
- National Museum of Ireland (NMI) Topographical Files (online via heritagemaps.ie)
- Excavations Bulletin
- Aerial Photographs
- Cartographic Sources

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2.3 Field Inspection Methodology

A field inspection of the proposed development site was undertaken by Rubicon Heritage Services Ltd on 24 March 2023 (Plates 1-7).

The primary purpose of a field inspection is to assess local topography in order to identify any potential low-visibility archaeological and/or historical sites, buildings or boundaries that are not currently recorded and which may be impacted upon negatively by the proposed development. It is also the purpose of the field inspection to survey any known monuments or sites and to consider the relationship between them and the surrounding landscape, all of which need to be considered during the assessment process.

The methodology used during the field inspection involved recording the present land use as well as the existing topography for the entire area comprising the proposed development site. A photographic record and written description were compiled for any known and/or potential sites of archaeological, architectural and/or cultural significance.

2.4 Methodology used for assessing baseline value of sites

In order to categorise the baseline environment in a systemised manner, 'baseline values' have been assigned to each identified site of cultural heritage significance and/or potential within the study area. The baseline value of a site is determined with reference to the 'importance' and 'sensitivity' of the site.

In accordance with NRA/ TII Guidelines, the importance of a site is determined based on the following criteria: legal status, condition, historical associations, amenity value, ritual value, specimen value, group value and rarity.

The sensitivity of a site is determined based on the presence of extant remains and/or the potential for associated sub-surface remains of the feature to be present *in situ*.

It should be noted that the National Monuments Act 1930-2004 does not differentiate between recorded archaeological sites on the basis of relative importance or sensitivity. In addition, the Local Government (Planning and Development) Act, 2000 does not differentiate between Protected Structures or Areas of Architectural Conservation on the basis of relative importance or sensitivity either. Consequently, professional judgement has been exercised to rate these features based on their perceived importance and sensitivity in relation to physical impacts and impacts on setting.

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Taking the above factors into consideration, the criteria that have been defined are provided in Table 2 below.

Subject	Baseline Value
- Recorded Archaeological Monuments - Protected Structures - Architectural Conservation Areas (ACAs)	Very High
- Sites listed in the NIAH that are not Protected Structures - Unregistered built heritage sites that comprise extant remains which are in good condition and/or which are regarded as constituting significant cultural heritage features - Unrecorded features of archaeological potential	High
- Unregistered built heritage sites that comprise extant remains which are in poor condition - Unregistered cultural heritage sites (not including built heritage sites) that comprise extant remains - Townland boundaries that comprise extant remains - Marshy/wetland areas	Medium/High
- Unregistered cultural heritage sites for which there are no extant remains but where there is potential for associated subsurface evidence - Townland boundaries for which there are no extant remains	Medium/Low
- Unregistered cultural heritage sites for which there are no extant remains and where there is little or no potential for associated subsurface evidence	Low

Table 2 – Baseline values of sites

Caution should be exercised when assessing the perceived significance of an archaeological, architectural or cultural heritage site as such categorisation is open to subjectivity. In addition, the perceived levels of importance as identified in this report are liable to future revision in the instance where new information, through the undertaking of further archaeological investigations, is provided.

2.5 Type of impacts

The following table lists the type of impacts that a proposed development may have on the cultural heritage resource:

Type of Impacts	Definition
Direct	Direct impacts arise where an archaeological, architectural and/or cultural heritage feature or site is physically located within the footprint of the proposed development, or its associated physical impact zone, whereby the removal of part, or all of the feature or site is thus required.
Indirect	Indirect impacts arise when an archaeological, architectural or cultural heritage feature is not located within the footprint of the proposed development, or its associated physical impact zone, and thus is not impacted directly. Such an impact could include impact on setting or impact on the zone of archaeological potential of site whereby the actual site itself is not physically affected.
Cumulative	The addition of many impacts to create a large, significant impact.
Undeterminable	Whereby the full consequence that the proposed development may have on the cultural heritage resource is not known.
Residual	The degree of environmental change that will occur after the proposed mitigation measures have taken effect.

Table 3 – Type of impacts

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2.6 Methodology used for assessing magnitude of impacts

The methodology used to assess the magnitude of potential pre-mitigation impacts, as well as residual impacts, of the proposed development on the baseline environment is presented in Table 4 below.

Impact magnitude	Criteria
Severe	- Applies where mitigation would be unlikely to remove adverse effects. Reserved for adverse, negative effects only. These effects arise where an archaeology site is completely and irreversibly destroyed. - An impact that obliterates the architectural heritage of a structure or feature of national or international importance. These effects arise where an architectural structure or feature is completely and irreversibly destroyed by the proposed development. Mitigation is unlikely to remove adverse effects.
Major	- An impact which, by its magnitude, duration or intensity, alters an important 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 feature/site. - An impact that by its magnitude, duration or intensity alters the character and/or the setting of the architectural heritage. These effects arise where an aspect or aspects of the architectural heritage is/are permanently impacted upon leading to a loss of character and integrity in the architectural structure or feature. Appropriate mitigation is likely to reduce the impact. - A beneficial or positive effect that permanently enhances or restores the character and/or setting of a feature of archaeological or cultural heritage significance in a clearly noticeable manner.
Moderate	- A medium impact arises where a change to a site/monument is proposed which though noticeable, is not such that the archaeological integrity of the site 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. - A medium impact to a site/monument may also arise when a site is fully or partly excavated under license and all recovered data is preserved by record. - An impact that results in a change to the architectural heritage which, although noticeable is not such that alters the integrity of the heritage. The change is likely to be consistent with existing and emerging trends. Impacts are probably reversible and may be of relatively short duration. Appropriate mitigation is very likely to reduce the impact. - A beneficial or positive effect that results in partial or temporary enhancement of the character and/or setting of a feature of archaeological or cultural heritage significance in a clearly noticeable manner.

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Impact magnitude	Criteria
Minor	- An impact which causes changes in the character of the environment, such as visual impact, which are not high or very high and do not directly impact or affect an archaeological feature or monument. - An impact that causes some minor change in the character of architectural heritage of local or regional importance without affecting its integrity or sensitivities. Although noticeable, the effects do not directly impact on the architectural structure or feature. Impacts are reversible and of relatively short duration. Appropriate mitigation will reduce the impact. - A beneficial or positive effect that causes some minor or temporary enhancement of the character of an architectural heritage significance which, although positive, is unlikely to be readily noticeable.
Negligible	- An impact on archaeological features or monument capable of measurement but without noticeable consequences. - An impact on architectural heritage of local importance that is capable of measure merit but without noticeable consequences. - A beneficial or positive effect on architectural heritage of local importance that is capable of measurement but without noticeable consequences.

Table 4 – Criteria used for rating magnitude of impacts

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2.7 Methodology used for assessing significance level of impacts

The significance level of a construction or operation impact on a feature is assessed by combining the magnitude of the impact and baseline value of the feature. The matrix in Table 5 provides a guide to decision-making but is not a substitute for professional judgement and interpretation, particularly where the baseline value or impact magnitude levels are not clear or are borderline between categories. The permanence of the effects are also taken into account, with irreversible effects being more significant while temporary or reversible changes are likely to be less significant.

Magnitude of Impact	Baseline Value				
	Very High	High	Medium/High	Medium/Low	Low
Severe	Very significant	Significant	Significant	Moderate	Slight
Major	Significant	Significant	Moderate	Slight	Slight
Moderate	Moderate	Moderate	Slight	Slight	Negligible
Minor	Slight	Slight	Slight	Negligible	Negligible
Negligible	Slight	Negligible	Negligible	Negligible	Negligible

Table 5 – Criteria for assessing significance level of impacts

2.8 Difficulties experienced during compilation of assessment

No difficulties were encountered during the preparation of this impact assessment.

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3 BASELINE/RECEIVING ENVIRONMENT

3.1 *Designated archaeological sites*

3.1.1 *Record of Monuments and Places (RMPs)*

Section 12 (1) of the National Monuments Act 1994 made provision for the establishment and maintenance of a Record of Monuments & Places (RMP). Under this Act, each site recorded in the Record of Monuments and Places is granted statutory protection. When the owner or occupier of a property, or any other person proposes to carry out, or to cause, or to permit the carrying out of any work at or in relation to a recorded archaeological monument they are required to give notice in writing to the Minister for Housing, Local Government and Heritage two months before commencing that work.

There are five recorded archaeological monuments incorporated by the study area (please refer to Section 1.3: Study Area). These include the site of a church (CH001), a graveyard (CH002), a bridge (CH003) a watermill (CH004) and an Anglo/Norman castle (CH005). These RMPs will not be impacted by the proposed works (Figures 1 and 2).

3.1.2 *National Monuments*

National monuments are broken into two categories: National Monuments in the ownership or guardianship of the state and National Monuments in the ownership or guardianship of a local authority. Section 8 of the National Monuments (Amendment) Act 1954 provides for the publication of a list of monuments, the preservation, of which, are considered to be of national importance. Two months' notice must be given to the Minister for Housing, Local Government and Heritage where work is proposed to be carried out at or in relation to any National Monument.

There are no National Monuments incorporated by the study area (please refer to Section 1.3: Study Area).

3.1.3 *Sites with Preservation Orders*

The National Monuments Act 1930-2004 provide for the making of Preservation Orders and Temporary Preservation Orders in respect of National Monuments. Under Section 8 of the National Monument Act 1930 (as amended) the Minister for Housing, Local Government and Heritage, can place a Preservation Order on a monument if, in the Ministers' opinion, it is a National Monument in danger of being or is actually being destroyed, injured or removed or is falling into decay through neglect. The Preservation Order ensures that the monument shall be safeguarded from destruction, alteration, injury, or removal, by any person or persons without the written consent of the Minister.

There are no sites with preservation orders incorporated by the study area (please refer to Section 1.3: Study Area).

3.2 *Designated architectural heritage sites*

In 1997 Ireland ratified the Granada Convention on architectural heritage. This provided the basis for a national commitment to the protection of the architectural heritage throughout the country. The Local Government (Planning and Development) Act 2000, and the Architectural Heritage (National

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Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999, made the legislative changes necessary to provide for a strengthening of the protection of architectural heritage.

3.2.1 *Record of Protected Structures*

The Dublin City Development Plan 2022–2028 was consulted for schedules of Protected Structures. These are buildings that a planning authority considers to be of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social, and/or technical point of view. Protected Structures receive statutory protection from injury or demolition under Section 57 (1) of the Local Government (Planning and Development) Act 2000. Protected structure status does not exclude development or alteration but requires the developer to consult with the relevant planning authority to ensure that elements which make the structure significant are not lost during development.

There are seven Protected Structures in the study area (please refer to Section 1.3: Study Area), two of which are RMPS and four are also listed on the NIAH. The protected structures are located between 70 – 525 m from the development site and will not be directly impacted by the proposed works. They consist of a Church (CH001), a graveyard (CH002), a second Church ‘Our lady of the Wayside’ (CH007), Hollybrook House (CH009), Drimnagh Castle (CH013), the former Mercedes Benz garage (CH015) and Naistera House (CH016) (Figures 1 and 2). **Note:** A separate conservation assessment has been compiled for the architectural heritage receptors adjacent to the proposed site and accompanies this application (Please see Goodbody 2023).

3.2.2 *Architectural Conservation Areas and Conservation Areas*

The Dublin City Development Plan 2022-2028 was consulted for records relating to Architectural Conservation Areas and Conservations Areas (hereinafter ‘ACAs’ and ‘CAs’ respectively). It is a policy of Dublin City Council 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.

There are two CAs within the study area (CH017 - Drimnagh Castle and curtilage and CH018 - Landsdowne Valley Park; Figure 2) (please refer to Section 1.3: Study Area). These CAs will not be impacted upon by the proposed works.

3.2.3 *National Inventory of Architectural Heritage (NIAH)*

The National Inventory of Architectural Heritage (hereinafter the ‘NIAH’) is a state initiative under the administration of the Department of Arts, Heritage and the Gaeltacht and was established on a statutory basis under the provisions of the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999. Its purpose is to identify, record and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently, as an aid in the protection and conservation of the built heritage. NIAH surveys provide the basis for the recommendations of the Minister for Arts, Heritage and the Gaeltacht to the planning authorities for the inclusion of particular structures in their Record of Protected Structures (RPS).

There are ten structures listed in the NIAH within the study area (including four PSs): Bluebell cemetery (CH006), Our lady of the Wayside Church (CH007), Landsdowne House (CH008), Hollybrook House (CH009), Drimnagh Castle Moat (CH010), Drimnagh Castle Bridge (CH011), Drimnagh Walled Garden (CH012), Drimnagh Castle Fortified House (CH013), Drimnagh Castle Barn and Stable Buildings

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(CH014) and the former Mercedes Benz Garage (CH015) (please refer to Section 1.3: Study Area). The NIAH sites will not be impacted by the proposed works (Figure 2).

3.2.4 *Undesignated Cultural Heritage Sites that Comprise Extant Remains*

Undesignated cultural heritage sites which comprise extant remains are typically, though not always, post-1700 in date. The majority of these sites are represented on the 6" and/or 25" Ordnance Survey maps. Many constitute country houses and associated lodges, while others may be bridges or industrial features, hollow-ways, mass rocks etc.

There are no undesignated cultural heritage site that comprises extant remains present within the proposed development site.

3.2.5 *Undesignated Cultural Heritage Sites that do not Comprise Extant Remains*

Undesignated cultural heritage features which do comprise extant remains typically include features such as lime kilns, dwellings, outhouses, trackways, bridges, industrial features etc which are identifiable on maps such as the 6" and/or 25" Ordnance Surveys but which no longer have an above-ground presence.

Analysis of the First Edition 6" and 25" Ordnance Survey mapping identified six undesignated cultural heritage features which do not comprise extant remains within the proposed development site consisting of: a millrace (CH019), a millpond (CH020), a former roadway (CH021), a sluice gate (CH022), a weir (CH023) and a channel of the Camac River (CH024). The proposed development could impact on any surviving sub-surface remains associated with these structures (Figure 2).

3.2.6 *Townland Boundaries*

A townland is the smallest official land unit in the country. Ireland is made up of approximately 60,000 townlands. Research into the name of these land units frequently provides information relating to its archaeology, history, folklore, ownership, topography or land use. Most place names were anglicised by the time the Ordnance Survey began in the 1830s. Despite some inaccuracies in translation, the Gaelic, Viking, Anglo-Norman and English origins of place names are generally recognisable.

Examination of the First Edition 6" Ordnance Survey map shows one townland boundary within the study area (CH025)—between Bluebell & Drimnagh. There will be no impact to the townland boundary as it is located outside the proposed development site (Figure 2).

3.2.7 *Industrial Heritage*

The Dublin City Industrial Heritage Record was developed between 2006 and 2009 as an action of the Dublin City Heritage Plan in conjunction with the city archaeologist with grant support from the Heritage Council's County Heritage Plan grant scheme. The DCHIR investigated and mapped 1219 sites throughout the city and produced a written record of each site and an extensive photographic record of 3866 photographs. Following a review of the DCIHR the survey in 2016 it was converted to GIS and published on heritagemaps.ie.

Examination of the information published on heritagemaps.ie in relation to the DCIHR has identified six sites of industrial heritage as follows: the site of a woollen mill (CH026), two bridges over the Camac (CH027 and CH028), the former Drimnagh paper mill (CH029), the former jam factory off the Naas Road (CH030) and a former printing office within Landsdowne valley park (CH031). There will be no

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impact to the sites of industrial heritage as they are located outside the proposed development site (Figure 2).

3.3 *Areas of archaeological potential*

Analysis of historic mapping (see Section 3.5 below) indicates that a series of late 19th/early 20th century structures could be present on the proposed development site (Figure 2). These include a millrace, millpond, a channel of the River Camac, a sluice gate and a weir which most likely had an association the water mill and later paper mill situated to the south-east of the proposed development, with the millrace also feeding the moat of Drimnagh Castle. The culverting of the River Camac in the mid to late 20th century is likely to have impacted on a number of the cultural heritage receptors listed above, but their survival outside of the culverted area cannot be entirely dismissed. As such the site as a whole can be regarded as an area of archaeological potential (CH032). No additional indication for other archaeological or historical remains is evident from historic maps within the study area (please refer to Section 1.3: Study Area; Figure 2).

3.4 *Topographical Files*

The topographical files of the National Museum of Ireland (NMI) are the national archive of all known antiquities recorded by the NMI. These files relate primarily to artefacts but also include references to monuments and contain a unique archive of records of previous excavations. The NMI's files present a catalogue of objects reported to the institution from 1928-95. The find-spots of artefacts can be an important indication of the archaeological potential of the related or surrounding area.

The topographical files list no archaeological finds from Drimnagh townland, Dublin.

3.5 *Archaeological and historical context* (after Shanahan and Kirby 2015)

3.5.1 *Prehistoric period*

The earliest evidence of human activity in the Dublin area is coastal. Wooden fish traps dating to 6100 – 5760 cal BC were found on the Mesolithic shoreline at Spencer Dock, Dublin 1 (McQuade 2008, 8-11). A number of shell middens and flint scatters – the most common evidence of Mesolithic activity - are located along the coast from Sutton and Malahide to Balbriggan, most notably on Lambay Island (Baker 2010, 8), and at Howth and Dalkey (Waddell 1998, 19).

A Late Neolithic single cist burial (DU018-037) was excavated at Drimnagh (770m southwest of the proposed development) in 1938 (Kilbride-Jones 1939). It was covered with a mound, into which Bronze Age cremation burials were later inserted. A variety of Neolithic monuments are located in the wider area. Passage tombs are found on peaks at Tallaght and Saggart. Portal tombs and wedge tombs are found in greater concentration to the south, nearing the foothills of the Dublin Mountains.

An Early Bronze Age burnt mound dated to c. 1938-1744 cal BC was excavated at a multi-period site (Bronze Age, Viking, medieval and post-medieval) at Hammond Lane, Dublin 7 (Cryerhall 2006).

The continuity in burial practices in the Late Neolithic/Early Bronze Age is evidenced in cist burials accompanied by bowl and vase food vessels from Knockmary, Phoenix Park (Stout and Stout 1992, 9). Two copper axeheads were discovered beside a cist burial at Suffolk Street, Dublin 2 (Waddell 1990, 81). Cists were also found at Tallaght and Lugmore on Tallaght Hill (Stout and Stout 1992, 10). In the

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late 19th century a flat cemetery of cist and pit burials was identified at Greenhills (DU022-002), 1.19km southwest of the proposed development.

Evidence of Iron Age settlement in the form of waterfront structures (c.160 – 60 BC), including carved wooden vessels, has been excavated at Ormond Quay, Dublin 1 (Bolger 2011). Within the wider area, there are enclosures of probable Iron Age date at Lugg on Saggart Hill, Athgoe Hill and Lyons Hill.

3.5.2 General History

The site is located in the townland of Drimnagh, parish of Drimnagh and barony of Uppercross. In the early medieval period, the proposed site was located in an area surrounded by a number of early medieval enclosures. The ecclesiastical complex at Crumlin (DU018-038), consisting of St Mary's Church, (DU018-038001), the associated graveyard (DU018-038002) and the sub-circular enclosure (DU018-038003) are situated approximately 1 km southwest of the development, with the site of a holy well (DU022-001) located 1 km south of the site at Walkinstown. To the southwest, the large monastery at Tallaght was founded in AD769 by St Maelruain, and was raided by the Vikings in 811.

Upon the arrival of the Anglo Normans in 1169, Cambro-Norman Richard FitzGilbert de Clare (also known as 'Strongbow') seized Dublin. Shortly after, in 1171, Henry II arrived to establish Dublin as the capital of the Norman territory in Ireland. The Anglo-Normans established manorial centres. Utilising established sites allowed the Anglo-Normans to avail of existing infrastructure. Manors were located on good agricultural land, with a water supply, connected by road, and on sites with some political significance. The manorial village was at the centre of economic life of the manor. Containing a manor house, parish church and tenant cottages, with mills, kilns and ovens generally nearby, it fulfilled an administrative, commercial and religious function.

A moated site was probably constructed at Drimnagh, one of just a few in the Dublin area (Murphy and Potterton 2010, 159, 201). Moated sites were areas enclosed by a rectangular/sub-rectangular water-filled ditch. Their primary function was as defended farmsteads of Anglo-Norman settlers. At Drimnagh, the Bluebell Stream still feeds the moat; it is the only medieval castle in Ireland to retain its flooded moat.

In 1215 King John granted the lands of Drimnagh and Terenure to the Anglo-Norman Hugh de Barnewall (Ball 1906, 126). Drimnagh Castle (DU018-036) was associated with the Barnewalls from the 13th century (Murphy and Potterton 2010, 159). The manor of Drimnagh remained in the possession of the Barnewall family until the 1630s (Joyce 1912, 196).

In 1460 John Barnewall was living at Drimnagh, and was sheriff of the county. At that time it was one of the principal castles in the metropolitan county, and it also had a mill (DU018-035) and millrace (Ball 1906, 128).

The former parish church (DU018-033001) and graveyard (DU018-033002) of Drimnagh are situated northwest of the castle, in Bluebell townland. Virtually nothing is known of the history of the church. In 1547, at the Dissolution, it was held by St Patrick's Cathedral (Ball 1906, 133).

The manors were subject to attacks from the Gaelic families from Wicklow. In 1331, after a raid in Tallaght, the O'Toole's killed some prominent local residents at Cuilagh near Crumlin, including two members of the Barnewall family of Drimnagh and a Bret of Rathfarnham (Wren 1987, 36).

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According to Friar John Clyn¹, the Black Death reached Ireland in 1348 through the port of either Howth or Dalkey. It devastated the population of Dublin city, re-occurring in 1362, late in the 14th century (Foley 2013, 177-8) and again in 1605 (Ball 1917, 92), and would have had an impact on the population at Drimnagh.

Attacks by Gaelic insurgents in the south Dublin area continued in the 16th century. In 1535, William Brabazon, the King's Treasurer in Ireland, wrote to Lord Cromwell, Chief Justice, encouraging him to appoint a new Lord Deputy to 'banish the O'Toole's, the Byrne's and the Kavanagh, with MacMurrough and his sept' (D'Alton 1838, 350).

In the 1630s Drimnagh Castle was leased to Sir Adam Loftus, later Lord Chancellor of Ireland, and nephew of Archbishop Loftus of Rathfarnham Castle (Joyce 1912, 196). Built in the late 16th century by the Loftus family, Rathfarnham was one of the first fortified houses in Ireland (Murphy and Potterton 2010, 158). Drimnagh was also remodelled as a fortified house; Loftus added a tower in the 17th century, which typifies the need for defence at the time.

During the Commonwealth period (1649-1660) Drimnagh Castle was described as 'an old castle made habitable', held by Philip Ferneley, Clerk of the Irish House of Commons, a lieutenant-colonel in the army, and Adam Loftus' son-in-law (Ball 1906, 131).

In 1649, immediately before the Battle of Rathmines, the Marquess of Ormonde was dissuaded by his officers from occupying Drimnagh Castle (Joyce 1912, 196).

Drimnagh Castle and its lands reverted to the Barnewalls of Bremore prior to Ferneley's death in 1677. By the early 18th century the family's male line had expired, and in 1727 the Drimnagh and Bremore estates were sold by Walter Bagenal to the Marquis of Lansdowne (Ball 1906, 131).

Gabriel Berenger illustrated Drimnagh castle in 1772 (Murphy and Potterton 2010, 147). In 1780 Austin Cooper noted that a Mr. Reilly occupied the castle (*ibid.* 132).

At the turn of the 19th century the population of Dublin city is estimated to have reached 200,000 (Casey 2005, 44). It was now one quarter the size of London, and twice the size of any other city in the British Isles. The rapid growth in population brought with it great poverty and disease. With the seat of government moving to Westminster in 1800 under the Act of Union, Dublin city entered a steep political and economic decline. During this period, Drimnagh remained a rural community with most of the population engaged in agriculture.

In 1838 D'Alton (1838, 702) noted that 'the little river, that filled the fosse [at Drimnagh Castle], has been in more modern times deepened into a reservoir for the uses of a paper-mill'. The paper mill was run by a Mrs. Sullivan and employed 25 people (*ibid.*).

Lewis (1837) records a *Mr. E. Cavanagh* as the then occupant of Drimnagh Castle. In the mid-late 1930s, Dublin Corporation built housing schemes in Drimnagh, on the eastern side of Lansdowne Valley. As the city expanded, Drimnagh Castle became part of the new suburb. The Hatch family were the last occupants prior to the purchase of the castle and its surrounding lands by the Christian Brothers in 1954.

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3.6 Cartographic evidence

3.6.1 Down Survey Map (1656)

The approximate location of the site can be seen on William Petty's 1655 map including the manor of 'Drumnagh', its castle, church, the 'Cammock' River, mill and millrace. It should be noted that a mill and millrace are recorded at Drimnagh almost 200 years earlier, in 1460 and that the structures shown on the Down Survey Map correlate to this activity (Ball 1906, 128; Figure 5).

3.6.2 Rocque's Map of Dublin c.1760

It is possible to identify the location of the site on Rocques map of Dublin, which lies to the south of the old Naas road and to the north of a mill and what appears to be Drimnagh Castle and its associated formal gardens, with Lansdowne valley park located to the east. The course of the Camac River is also discernible. The surrounding landscape appears to be largely agricultural (Figure 6).

3.6.3 1st Edition Ordnance Survey 6-inch series (1837-42)

The 1837-43 first edition Ordnance Survey (OS) map (Figure 7) illustrates the industrial nature of the site. Annotated as being part of Lansdowne Valley, the millrace (CH019) that supplied the water source for the moat associated with Drimnagh Castle and which powered the Drimnagh Paper Mill to the southeast of the site is depicted along the western edge of the site. An associated large millpond (CH020) dominates the central part, with a channel of the Camac River (CH024) located in the southeast corner of the site. A former roadway (CH021) linking the old Naas road with the Drimnagh Paper Mills can also be identified. The road crosses the Camac via a small bridge (CH028) to the east of the millpond. The surrounding area remains largely agricultural. The townland boundary between Bluebell and Drimnagh (CH025) is also shown as being demarcated by the Old Naas Road.

3.6.4 Ordnance Survey 25-inch series map (1910-11)

The proposed development site has undergone very little change at this point. The map is more detailed, with a series of buildings depicted along the Old Naas Road to the north of the proposed development, with the footprints of Drimnagh Castle and the Drimnagh Paper Mills clearly outlined to the southeast. A sluice gate (CH022) and a weir (CH023) are depicted at the eastern edge of the millpond where it meets the mouth of the River Camac (Figure 8).

3.6.5 Ordnance Survey Casini 6-inch series (1936)

No significant changes from the earlier 25-inch series map can be discerned, but the surrounding area has changed significantly. The suburb and town of Drimnagh has been developed in addition to the new Naas Road, bridging over River Camac at this location. A Jam Factory (CH030) is also depicted to the east of the proposed development at this time (Figure 9).

3.7 Recent excavations

A number of archaeological investigations have been carried out within the environs of the proposed site. The vast majority of these investigations were undertaken in relation to Drimnagh Castle where features dating from the medieval period to the late 19th century were identified. The investigation located nearest the proposed development is that of the archaeological test trenching undertaken in association with the housing development located on lands that were previously occupied by the Carraiglea Industrial Estate.

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Eight test trenches were excavated across the site, each one in the location of one of the proposed housing blocks. Two further planned trenches could not be excavated as they were in a part of the site still occupied by a tenant. The trenches were excavated with a 2m-wide toothless bucket, with a narrower toothed bucket being used in areas where the modern fill extended to a depth greater than 2m. The trenches were 28-55m in length and were investigated to a maximum depth of 5m.

The Carriglea Industrial Estate was built in the 1970s on a new, level land surface produced by infilling Lansdowne Valley at this point and culverting the river Camac. The fill, which is reported to be 10m deep in places, consists of various types of rubble and soil, probably brought from a number of different locations. The infilled valley comprised about five-sixths of the site. The side of the valley was only encountered in Trenches, 2 and 4. In Trenches 1, 5-7 and 9 the bottom of the fill was not reached. These were dug to a maximum depth of 5m.

The remaining eastern area of the site was located on what was originally higher ground next to the valley. The original ground surface appears to have survived relatively intact apart from the removal of the sod layer, with traces of spade cultivation furrows noted during the investigation.

The infilling of the valley means that the area with the greatest potential for archaeology is buried beneath 10m of made ground and was most likely disturbed in the course of infilling. No features of archaeological significance were identified during these investigations (see Appendix 2).

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4 IMPACT STATEMENT

4.1 Description of the site

The site is bounded to the north-west by the Naas Road and by a number of schemes emerging through planning such as the Concorde Industrial Estate and SouthWest Gate development to the south-west, the Carriglea Industrial Estate development to the south-east. The north-east boundary is comprised of an existing commercial and office building.

4.1.1 Past impacts on site

The River Camac was culverted beneath the proposed development in the twentieth century and currently lies approximately 4.5 m – 9 m below the currently ground level. The site was then infilled and developed and currently contains Gowan House, the former headquarters of Gowan Group motor importers (Opel, Peugeot, Citroen and DS franchises). It is likely that the culverting of the Camac, the infilling and the construction of the extant property impacted cultural heritage receptors CH015–CH020.

4.1.2 Summary of baseline environment

Site Type	Summary
- RMPs - National Monuments - Sites with Preservation Orders - Sites listed in the Register of Historic Monuments	There are five recorded archaeological monuments incorporated by the study area (two of which are also designated PS sites). There are no National Monuments or sites with Preservation Orders within the study area.
- Protected Structures	There are seven protected structures incorporated in the study area (two of which are listed as RMP sites and four are listed on the NIAH).
- Architectural Conservation Areas (ACAs) and Conservation Areas (CAs)	There are two Conservation Areas incorporated by the study area.
- Sites Listed in the NIAH	There are ten structures listed in the NIAH within the study area, including four protected structures.
- Sites listed in the DCIHR	There are six sites listed in the Dublin City Industrial Heritage Record located within the study area.
- Townland Boundaries	There is one townland boundary located within the study area.
- Unregistered Cultural Heritage Sites	There are six unregistered cultural heritage sites incorporated by the study area, all of which lie within the development area
- Areas/features of archaeological potential	The development site as a whole is also regarded as an area of archaeological potential.

Table 6 – Summary of baseline environment

4.2 Description of the proposed development

Malclose Limited intend to apply to Dublin City Council for a 7-year permission for a large-scale residential development principally comprising student accommodation at this 0.962 Ha site at Gowan House, Carriglea Business Park, Naas Road, Dublin 12, D12 RCC4.

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Works to upgrade of the access road to the west of the site on an area measuring c. 0.081 Ha are also proposed comprising new surfacing to the carriageway, the provision of inbound and outbound bicycle lanes from the development entrance to the Naas Road, the provision of a controlled pedestrian crossing on the access road at the Naas Road junction, and the provision of a further uncontrolled pedestrian and bicycle crossing linking the subject site with the approved Concorde SHD development (ABP Ref: TA29S.312218) to the west.

On the Naas Road, works are proposed on an area measuring c. 0.086 Ha comprising the realignment and widening of the existing pedestrian footpath along the westbound carriageway of the Naas Road and the provision of linkages from the realigned footpath to the development site, and the provision of new controlled pedestrian crossings across the eastbound and westbound carriageways of the Naas Road and the provision of a new uncontrolled crossing of the Luas tracks.

The development site area and roadworks areas will provide a total application site area of c. 1.13 Ha.

The proposed development will principally consist of: the demolition of the existing two-storey office/warehouse building and outbuilding (5,172 sq m); and the construction of a development in two blocks (Block 1 (eastern block) is part 2 No. storeys to part 15 No. storeys over lower ground floor and basement levels with roof plant over and Block 2 (western block) is part 9 No. storeys to part 11 No. storeys over basement with roof plant over) principally comprising 941 No. Student Accommodation bedspaces (871 No. standard rooms, 47 No. accessible studio rooms and 23 No. studios) with associated facilities, which will be utilised for short-term lets during student holiday periods. The 871 No. standard rooms are provided in 123 No. clusters ranging in size from 3 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.

The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (1,422 sq m internal and 131 sq m external) principally comprising a digital hub and co-working space with ancillary cafe; a retail unit (250 sq m); public open space; the daylighting of the culverted River Camac through the site; an elevated walkway above the River Camac at ground floor level; a pedestrian bridge link at first floor level between Blocks 1 and 2; vehicular access at the south-western corner; the provision of 7 No. car-parking spaces, 2 No. motorcycle parking spaces and 2 No. set down areas; bicycle stores at ground and lower ground floor levels; visitor cycle parking spaces; bin stores; substations; hard and soft landscaping; green and blue roofs; new telecommunications infrastructure at roof level of Block 1 including antennas and microwave link dishes, 18 No. antennas and 6 No. transmission dishes, together with all associated equipment; boundary treatments; plant; lift overruns; and all associated works above and below ground.

The gross floor area of the development is c. 33,140 sq m comprising c. 30,386 sq m above lower ground and basement level.

4.3 Impact assessment

This section assesses the likely significant impacts that the proposed development will have on the baseline/receiving environment, prior to the implementation of any mitigation measures. The methodology used in ascertaining the baseline value of sites, the type, magnitude and significance level of impacts is set out in Section 2 above.

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Mitigation measures to ameliorate these impacts and the residual impact that the proposed scheme will have on each site of cultural heritage significance and/or potential are provided in Sections 5 and 6 below.

Present ground level across the proposed site area varies from c 39.03 m OD to c. 39.28 m OD. The construction of the new building will require the demolition of all existing structures on site and ground reduction of a minimum of 2–3 m to accommodate the lower ground floors. The proposed new ground slab will require excavation across the remaining footprint in the region of up to 1 m, with localised deeper excavation will also be required for ground-beams and services. The public realm works (consisting of exposing the River Camac culvert and creating the linear park through the central part of the site) will involve ground reduction of between 4.5 m and 9 m below the existing ground level along a 11.45 m wide central wayleave.

As such the proposed works may encounter surviving in-situ archaeological remains associated with 19th-century milling activity associated with CH019–CH024 as depicted on historical sources (Table 7).

All impacts that occur during the construction phase are likely to be direct impacts as a result of sub-surface disturbance or construction works.

CH No.	Impact Type	Description of Impact	Magnitude of impact prior to implementation of mitigation measures	Baseline Value	Significance level of impact prior to implementation of mitigation measures
019	Direct	Impacts will occur as a result of construction groundworks	Major	Medium/Low	Slight
020	Direct	Impacts will occur as a result of construction groundworks	Major	Medium/Low	Slight
021	Direct	Impacts will occur as a result of construction groundworks	Major	Medium/Low	Slight
022	Direct	Impacts will occur as a result of construction groundworks	Major	Medium/Low	Slight
023	Direct	Impacts will occur as a result of construction groundworks	Major	Medium/Low	Slight
024	Direct	Impacts will occur as a result of construction groundworks	Major	Medium/Low	Slight
032	Direct	Impacts will occur as a result of construction groundworks	Major	High	Significant

Table 7 – Summary of impacts and impact magnitude prior to mitigation

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5 MITIGATION STRATEGY

The mitigation strategies outlined in this section detail the techniques to be adopted in order to ameliorate the impacts that the proposed development may have on features of archaeological, architectural and/or cultural heritage within the study area. The residual impacts that will remain once these mitigation measures have been implemented are identified in Section 6 further on.

The following mitigation measures proposed are subject to approval by Dublin City Council, the National Monuments Service, Department of Housing, Local Government and Heritage.

The current policy of the Minister for Housing, Local Government and Heritage is that preservation *in situ* of archaeological material is the preferred option. **Note:** where this cannot be achieved then a programme of full archaeological excavation should be implemented to ensure the preservation by record of all affected archaeological material.

1. The site shall be subject to a programme of pre-construction archaeological test trenching, under licence, by a suitably qualified archaeologist in order to identify the nature, extent and location of any sub-surface archaeological material. Note: where possible enabling or other groundworks works should be deferred until after the archaeological test trenching programme has been completed. Any enabling or demolition works that must be carried out prior to completion of the testing programme shall be the subject of a programme of licensed archaeological monitoring by a suitably qualified archaeologist.
2. A report on the results of the test trenching programme shall be submitted to Dublin City Council, the Heritage and Planning Division, Department of Housing, Local Government and Heritage (DHLGH) and the National Museum of Ireland prior to the commencement of the main construction programme. This report will include:
 - a. an updated impact statement of the proposed development on any surviving archaeological material and describe any appropriate further mitigation measures required in the event that the trenching programme confirms the presence of archaeological features or deposits.
3. Any such further mitigation measures required must be agreed in advance with the City Archaeologist (Dublin City Council) and the National Monuments Service (DHLGH).

Note: Where preservation *in situ* of any identified archaeological remains cannot be achieved, either in whole or in part, then a programme of full archaeological excavation will be required, to ensure the preservation by record of any archaeological features that will be directly impacted upon.

Please note all the recommendations in this report are subject to approval of Dublin City Council and the National Monuments Service, Department of Housing, Local Government and Heritage.

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6 CONCLUSIONS

6.1 Summary of archaeological findings

The archaeological assessment of the proposed development site at Gowan House has identified 32 sites of archaeological, and/or cultural heritage significance within the study area. These comprise five RMPs (two of which are also designated PS sites), seven Protected Structures (PS) (two of which are listed as RMP sites and four are listed on the NIAH), ten NIAH sites (including four Protected Structures), two Conservation Area (CA), one area of archaeological potential (AAP), one townland boundary (TB), six unregistered cultural heritage sites (UCH) and six industrial heritage sites (IH).

The results of this impact assessment indicate that the development site as a whole is an area of archaeological potential. It is expected that any impacts to archaeology would occur as a result of construction groundworks relating to the proposed development.

6.2 Recommendations

The following mitigation measures proposed.

1. The site shall be subject to a programme of pre-construction archaeological test trenching, under licence, by a suitably qualified archaeologist in order to identify the nature, extent and location of any sub-surface archaeological material. Note: where possible enabling or other groundworks works should be deferred until after the archaeological test trenching programme has been completed. Any enabling or demolition works that must be carried out prior to completion of the testing programme shall be the subject of a programme of licensed archaeological monitoring by a suitably qualified archaeologist.
2. A report on the results of the test trenching programme shall be submitted to Dublin City Council, the Heritage and Planning Division, Department of Housing, Local Government and Heritage (DHLGH) and the National Museum of Ireland prior to the commencement of the main construction programme. This report will include:
 - a. an updated impact statement of the proposed development on any surviving archaeological material and describe any appropriate further mitigation measures required in the event that the trenching programme confirms the presence of archaeological features or deposits.
3. Any such further mitigation measures required must be agreed in advance with the City Archaeologist (Dublin City Council) and the National Monuments Service (DHLGH).

Note: Where preservation in situ of any identified archaeological remains cannot be achieved, either in whole or in part, then a programme of full archaeological excavation will be required, to ensure the preservation by record of any archaeological features that will be directly impacted upon.

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6.3 Residual impacts

CH No.	Baseline Value	Impact Type	Mitigation Measures	Magnitude of impact taking into account mitigation measures	Significance level of impact after implementation of mitigation measures
019	Medium/Low	Direct	Archaeological test trenching	Minor	Negligible
020	Medium / Low	Direct	Archaeological test trenching	Minor	Negligible
021	Medium/Low	Direct	Archaeological test trenching	Minor	Negligible
022	Medium / Low	Direct	Archaeological test trenching	Minor	Negligible
023	Medium/Low	Direct	Archaeological test trenching	Minor	Negligible
024	Medium / Low	Direct	Archaeological test trenching	Minor	Negligible
032	High	Direct	Archaeological test trenching	Moderate	Slight

Table 8 – Summary of impacts and impact magnitude after implementation of mitigation

Please note all the recommendations in this report are subject to approval of Dublin City Council and the National Monuments Service, Department of Housing, Local Government and Heritage.

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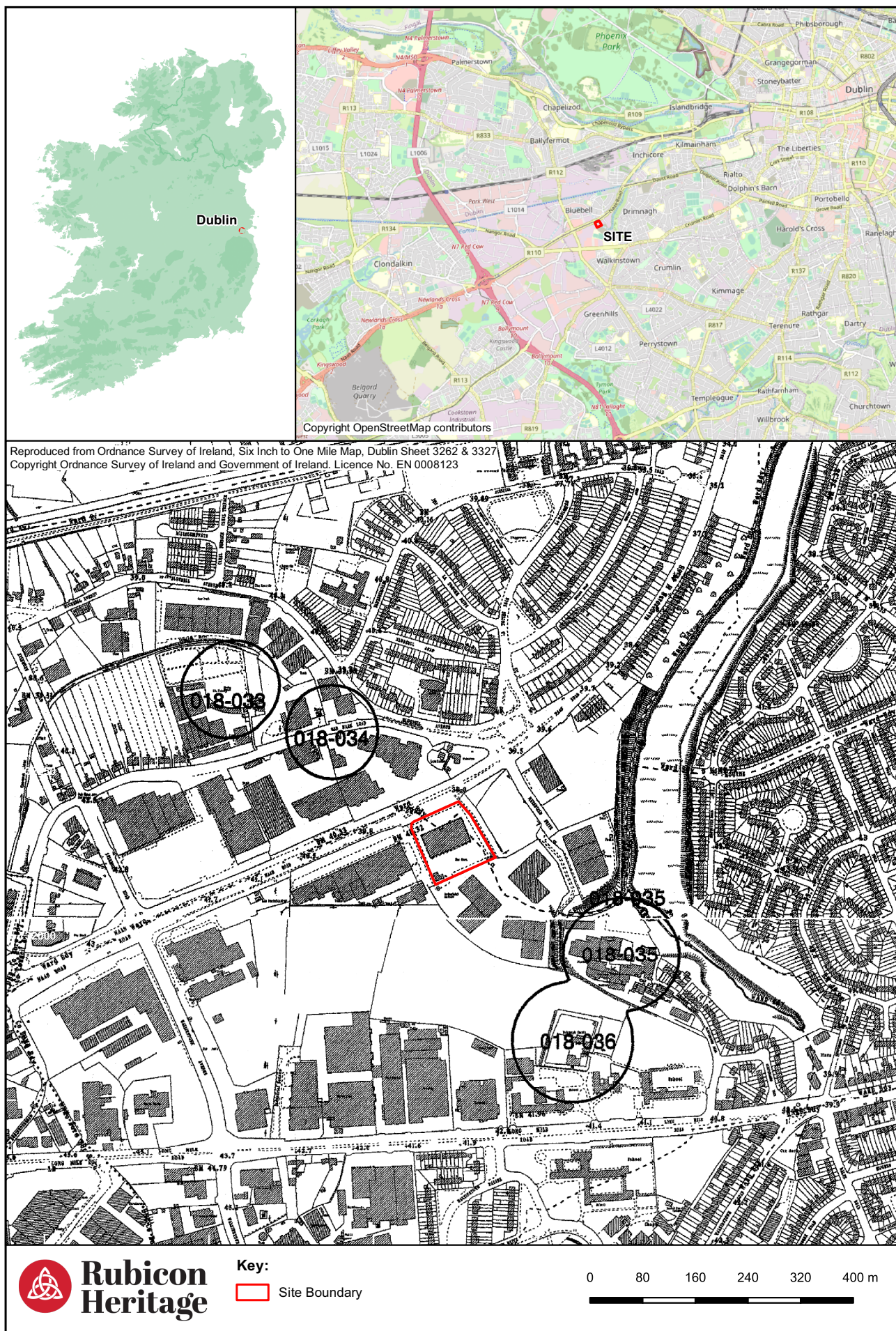


Figure 1 - Gowan House, Dublin 12: Site location and RMP mapping.

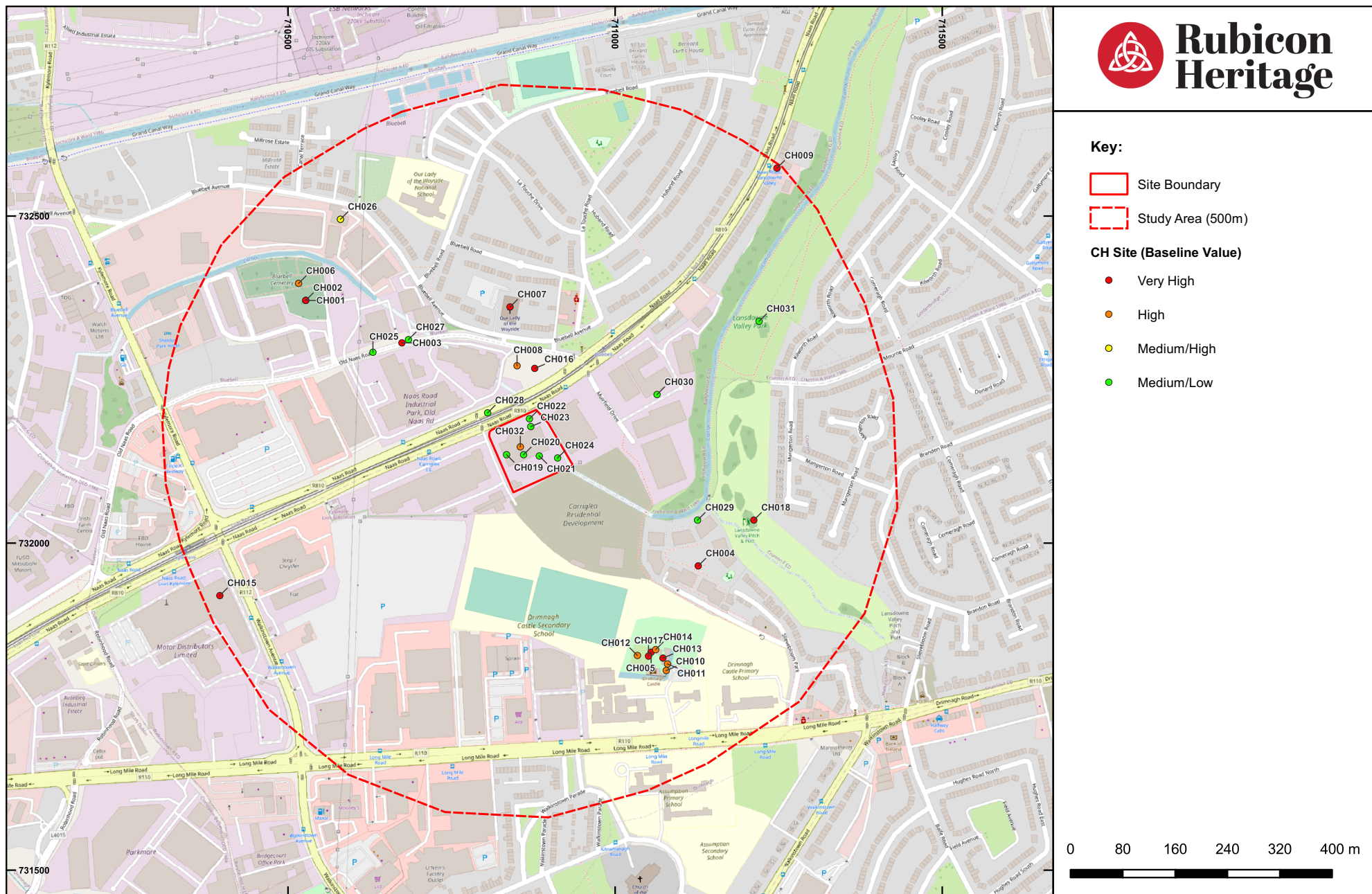


Figure 2 - Cultural Heritage sites within 500m radius of proposed development site.

[illegible]

Key Plan

- Planing site boundary
 Ownership boundary
 Developable Site Area



DESIGN PHASE	PURPOSE OF ISSUE
☐ Feasibility Studies	☐ For Information
☐ Concept Design	☐ For Comment
☐ Developed Design	☐ For Approval
☐ Technical Design	☐ Tender
☐ Construction	☐ Contract
☐ Handover & Close	☐ For Construction
☐ Tender Documentation	☐ As Built
	☒ Planning
	☐ Building Control

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HKR
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Project Title

Gowan House

Drawing Title
Lower Ground Floor
(Cycle Store)

Drawing No.

GWH-HKR-XX-B1-DR-A-0221

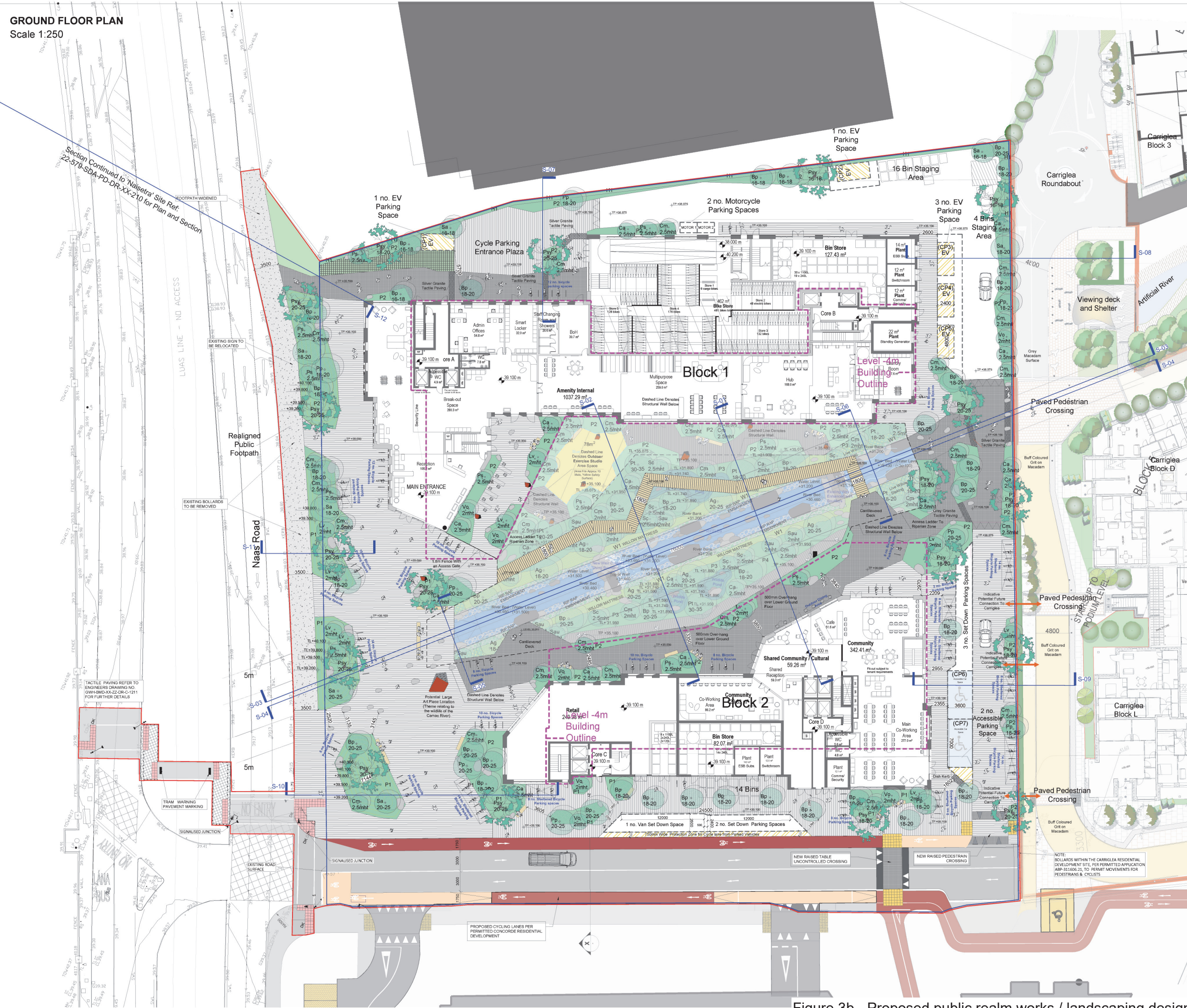
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HKR Project No.
04021

Revision

Figure 3a - Proposed Lower Ground Floor Layout.

GROUND FLOOR PLAN
Scale 1:250



SPECIFICATION KEY	
	Modular Silver Granite Paving Slabs
	Paving Grey Granite Setts
	Anti-Slip Iroko Hardwood Decking
	Iroko Hardwood Benches
	Sheffield Bicycle Stands
	Riparian Zone Planting (P4)
	Perennial Planting Beds (P1, P2 and P3) - Planting to BS3882 multi-purpose topsoil on free-draining sub-base, topped with 90gsm² black landscape fabric and 50mm depth medium-grade bark mulch. - Ornamental perennial planting to comprise ornamental grasses, flowering perennials and climbers to soften the visual impact of the development. - Apply non-woven Weed-guard type filter geotextile membrane landscape fabric, black colour, 90gsm² Weedguard by Terram or EGA.
	Grass Lawn
	Grass Pave
	CLEAR-STEMMED TO 2M HEIGHT and MULTI-STEMMED SEMI-MATURE TREES - Semi-mature trees provided with 1200mm² multi-purpose grade topsoil to BS 3882, topped with black 90gsm² landscape fabric secured with plastic pegs at 300mm c/c & 75mm depth medium-grade bark mulch. - Trees double-staked & supplied with planting accessories, and provided with root restrictors within 2m of paving, underground services and foundations. - Apply non-woven Weed-guard type filter geotextile membrane landscape fabric, black colour, 90gsm² Weedguard by Terram or EGA.
	SEMI-MATURE FEATURE TREES - Semi-mature native species provided with 1200mm² multi-purpose grade topsoil to BS 3882, topped with black 90gsm² landscape fabric secured with plastic pegs at 300mm c/c & 75mm depth medium-grade bark mulch. - Trees double-staked & supplied with planting accessories, and provided with root restrictors within 2m of paving, underground services and foundations. - Apply non-woven Weed-guard type filter geotextile membrane landscape fabric, black colour, 90gsm² Weedguard by Terram or EGA.
	Granite Boulders
	1000L Bins (Staging Areas)
	Sculptures

TREE NOTES:	
Psy	<i>Pinus sylvestris</i> (scot's pine)
Bp	<i>Betula pubescens</i> (downy birch)
Pp	<i>Prunus padus</i> (bird cherry)
Pt	<i>Populus tremula</i> (aspen)
Ag	<i>Alnus glutinosa</i> (alder)
Sa	<i>Sorbus aucuparia</i> (rowan)
Sc	<i>Salix caprea</i> (goat willow) multi-stemmed
Sau	<i>Salix aurita</i> (eared willow) multi-stemmed
Cm	<i>Crataegus monogyna</i> (hawthorn) multi-stemmed
Ca	<i>Corylus avellana</i> (hazel) multi-stemmed
Ps	<i>Prunus spinosa</i> (sloe) multi-stemmed
Lv	<i>Ligustrum vulgare</i> (wild privet) multi-stemmed
Vo	<i>Viburnum opulus</i> (guelder rose) multi-stemmed
Ee	<i>Euonymus europaeus</i> (spindle tree) multi-stemmed

Total of 225 New Native Irish Trees are proposed to be planted throughout all of the levels within this scheme

218 no. Bicycle Parking Spaces at Ground Level

7 no. Car Parking Spaces

(CP1-CP5 EV Car Parking Spaces)

(CP6 & CP7 Accessible Car Parking Space)

2 no. Set Down Bays

2 no. Motorcycle Parking Spaces

2 Designated areas for Bin Staging Areas and refuse Truck Set Down

- 20 x 1000L (East of Block 1)
- 14 x 1000L (South-West Block 2)

Level Notes:	
EX+	Existing Level
TL+	Top of Landscape Finish
TP+	Top of Paving
TK+	Top of Kerb
TW+	Top of Walls
TE+	Top of Edging
TR+	Top of Railing
TB+	Top of Bench
TS+	Top of Slab

STEPHEN DIAMOND ASSOCIATES

CHARTERED LANDSCAPE ARCHITECTS

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Client Malclose Limited

Project Gowan House

Title Ground Floor Masterplan

Drng No 22-579-SDA-PD-DR-GF-001

Drawn BS

tel: 01 6775670

fax: 01 6775669

Project No. 22-579

Scale 1:250 @ A1

Date issued 2023-10-09

Purpose Planning

Checked SD

Figure 3b - Proposed public realm works / landscaping design.

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A1

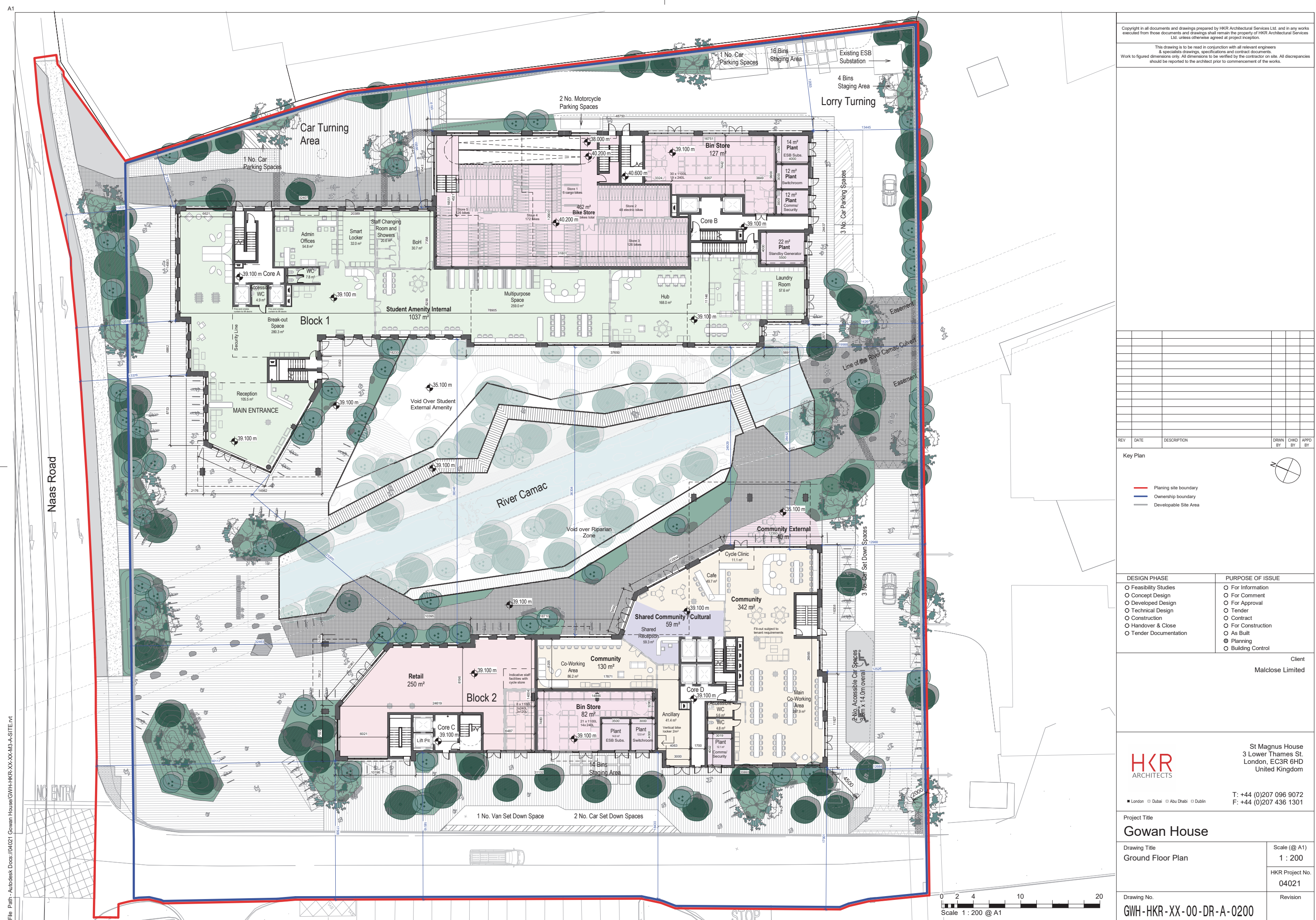
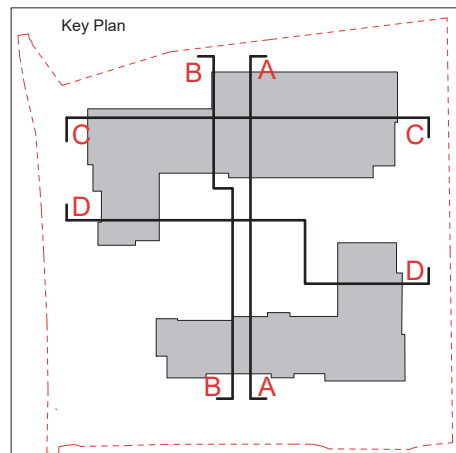
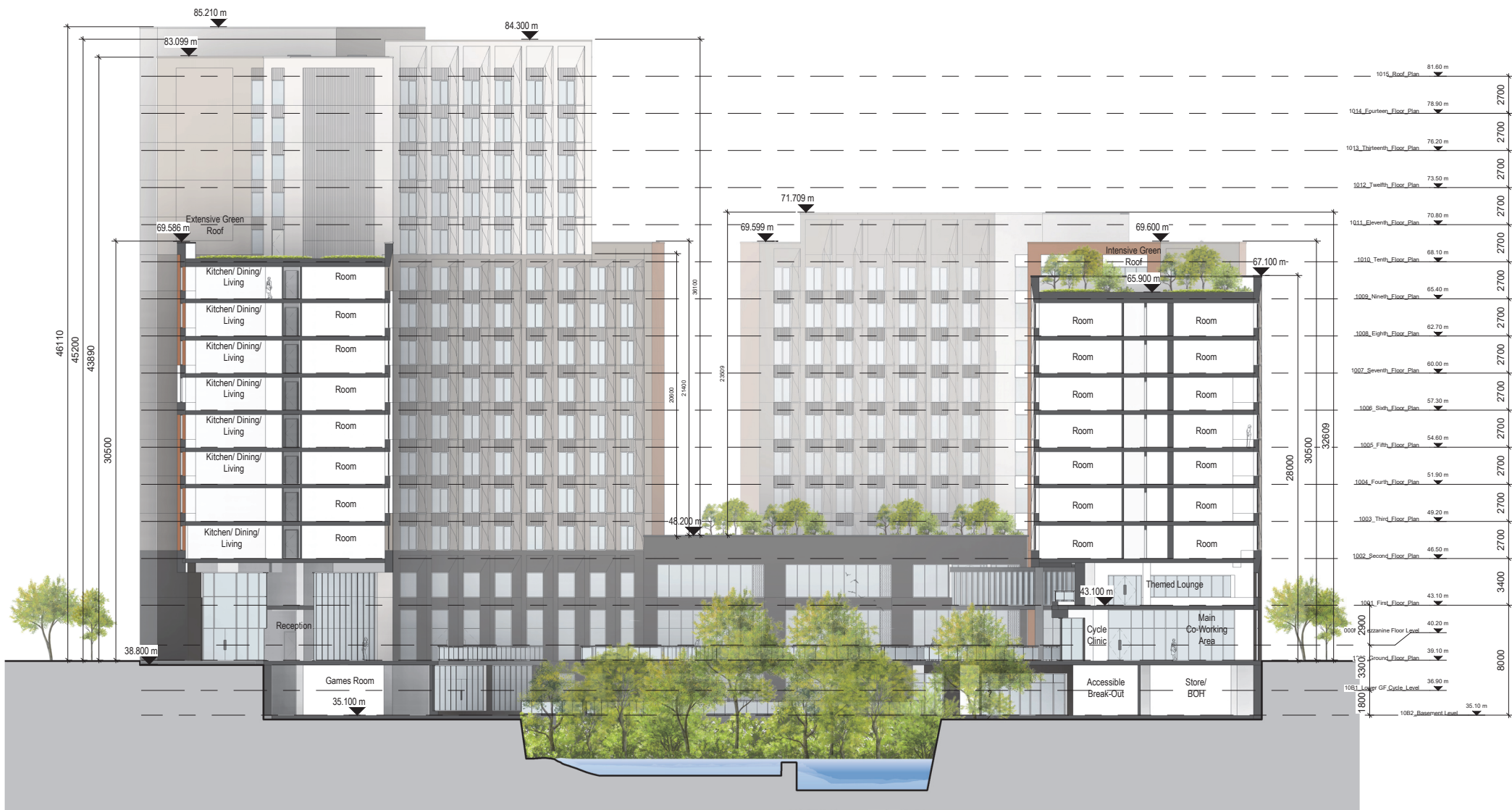


Figure 4a - Proposed Ground Floor Layout.

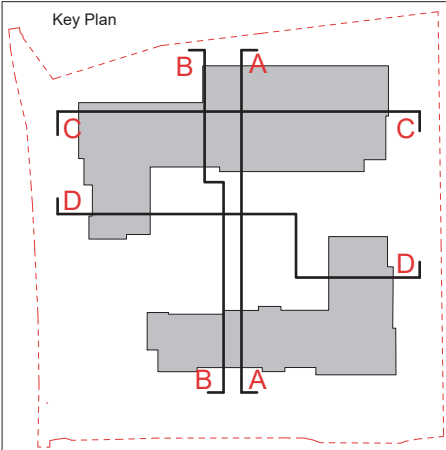


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This drawing is to be read in conjunction with all relevant engineers & specialists drawings, specifications and contract documents. Work to figured dimensions only. All dimensions to be verified by the contractor on site. All discrepancies should be reported to the architect prior to commencement of the works.			T: +44 (0)207 096 9072 F: +44 (0)207 436 1301			REV DATE DESCRIPTION			DRWN BY CHKD BY APPD BY			Project Title Gowan House			Drawing No. GWH-HKR-XX-ZZ-DR-A-0502			Revision			Scale (@ A1) 1 : 200			HKR Project No. 04021		

Figure 4b - Site section showing northern lower ground floor.



1 Section DD
1 : 200



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				REV	DATE	DESCRIPTION	DRWN BY	CHKD BY	APPD BY											
Project Title Gowan House	Drawing No. GWH-HKR-XX-ZZ-DR-A-0503	HKR Project No. 04021	Revision																	

Figure 4c - Site section showing southern lower ground floor.

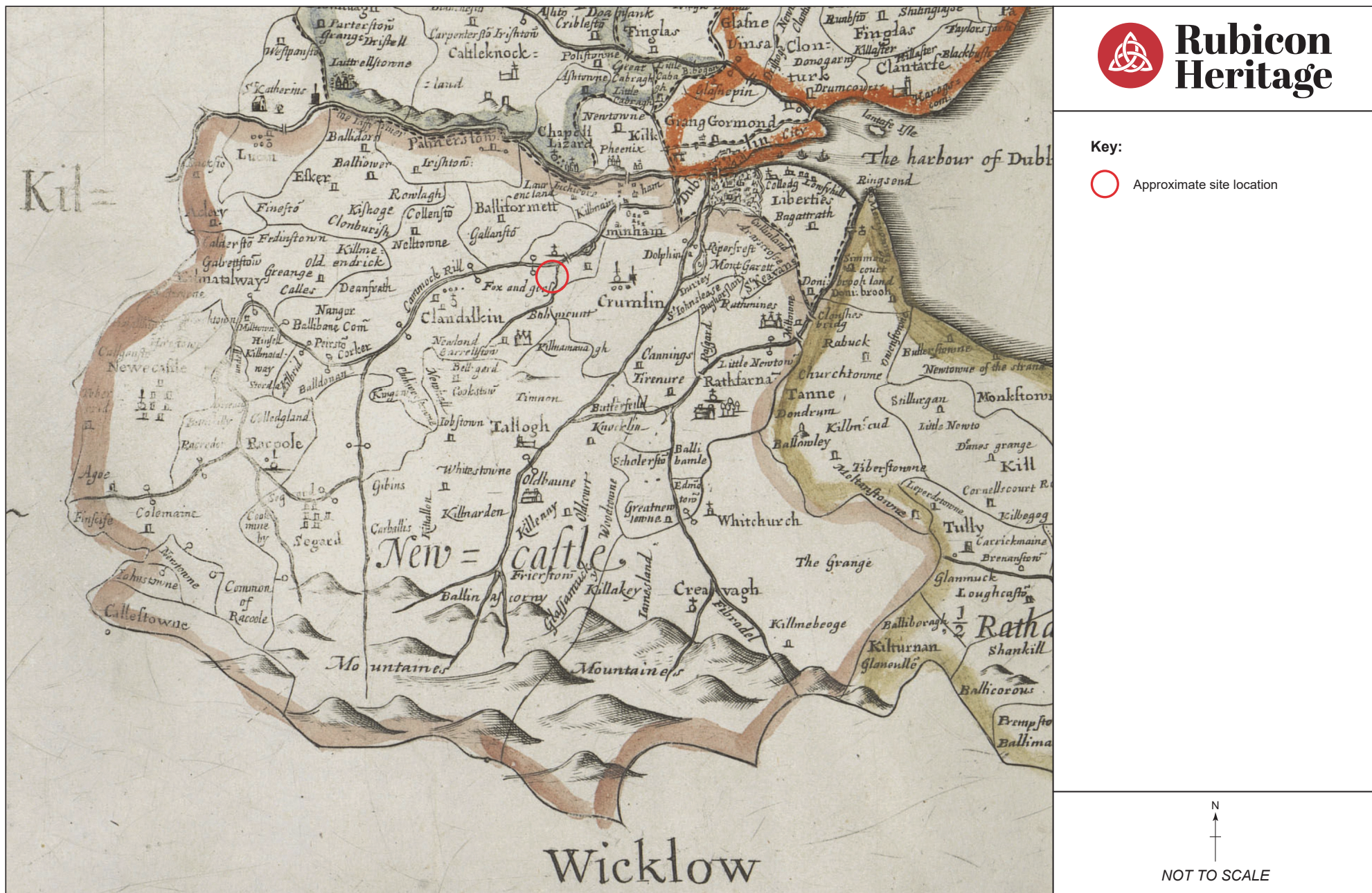


Figure 5 - Extract from Down Survey Map, County Dublin.



**Rubicon
Heritage**

Key:



Approximate site location



NOT TO SCALE

Figure 6 - Extract from Rocque's Map of County Dublin.

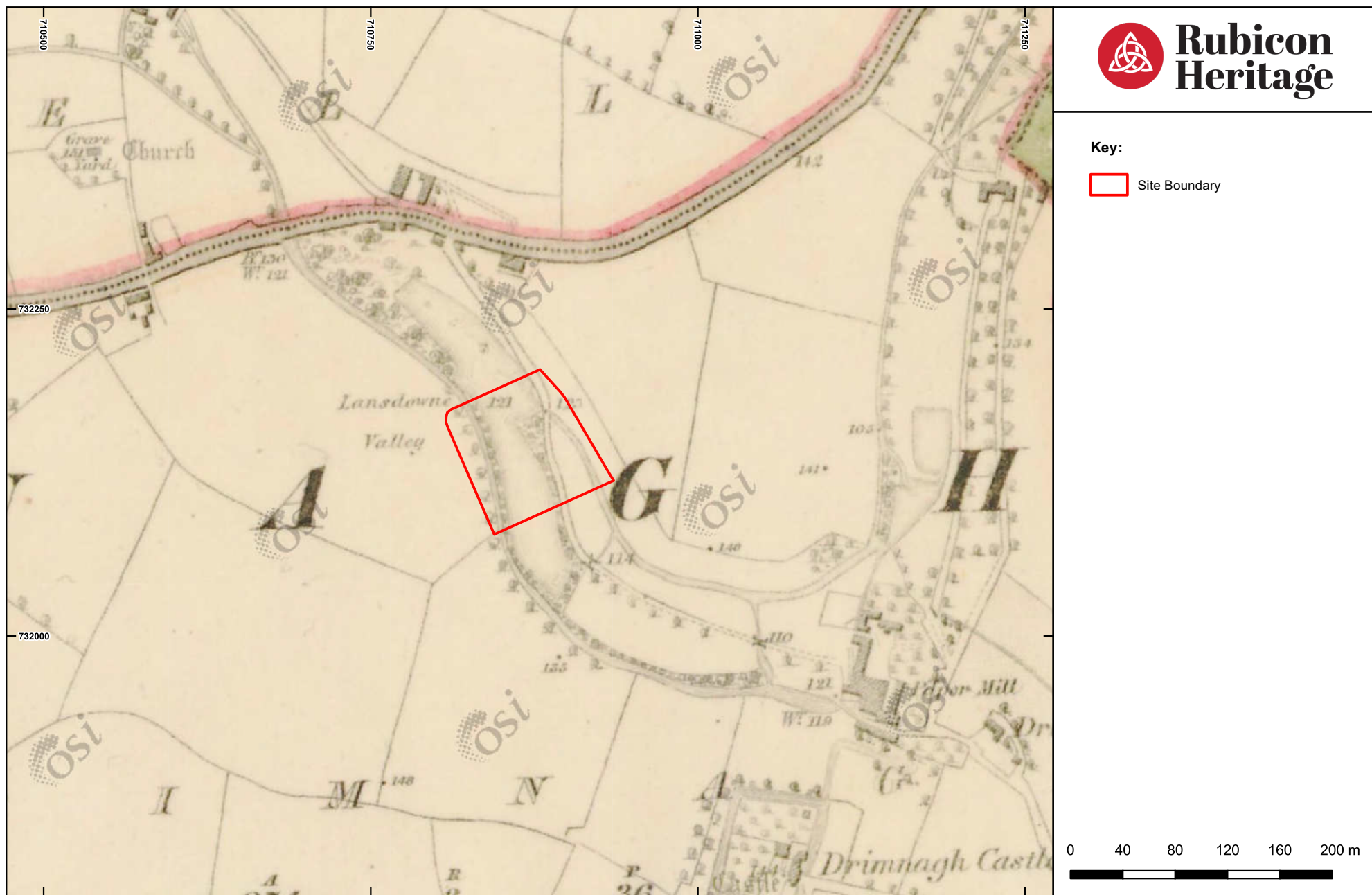


Figure 7 - First edition 6-inch Ordnance Survey map showing proposed development site.

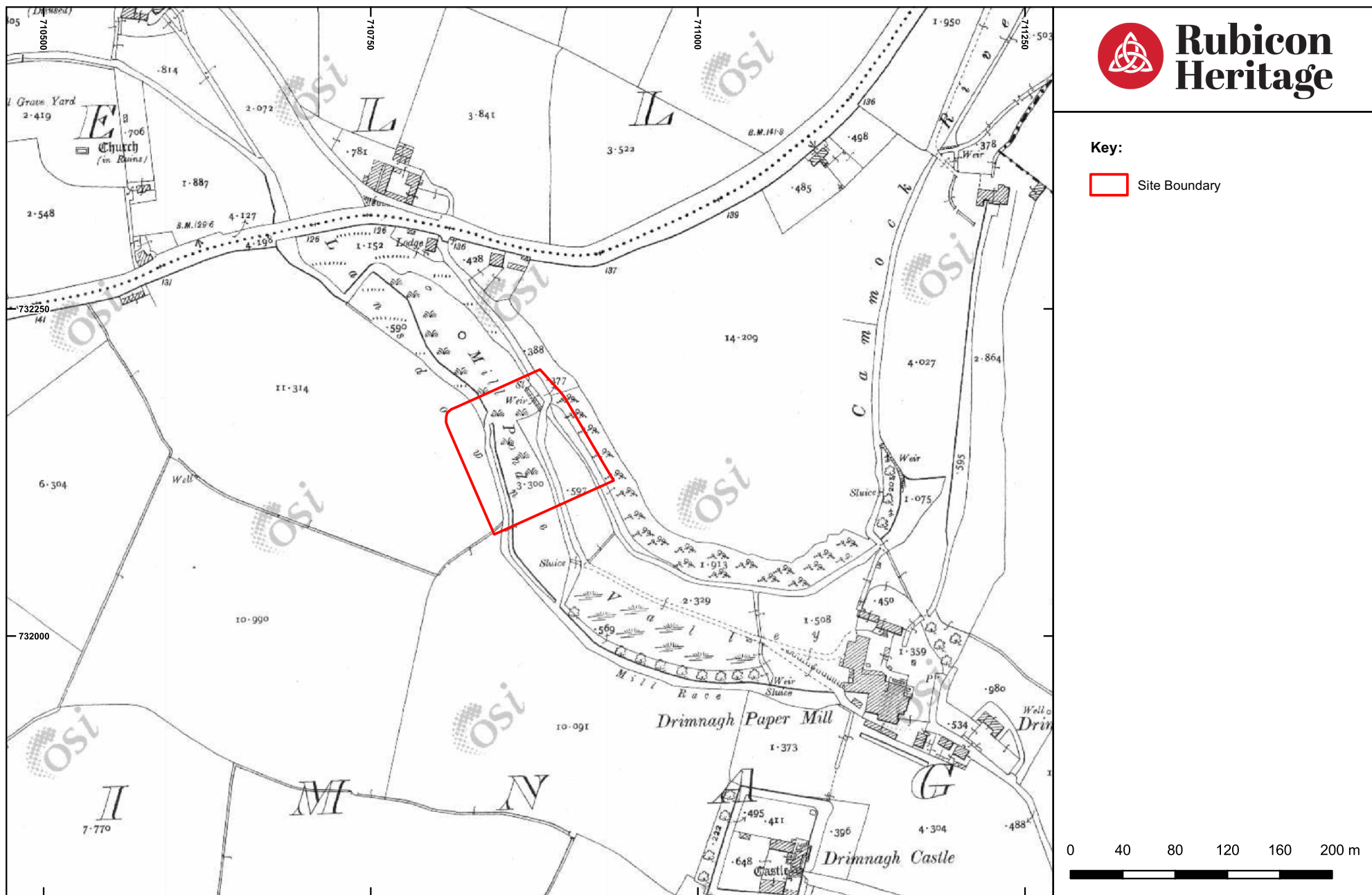


Figure 8 - Second edition 25-inch Ordnance Survey map showing proposed development site.

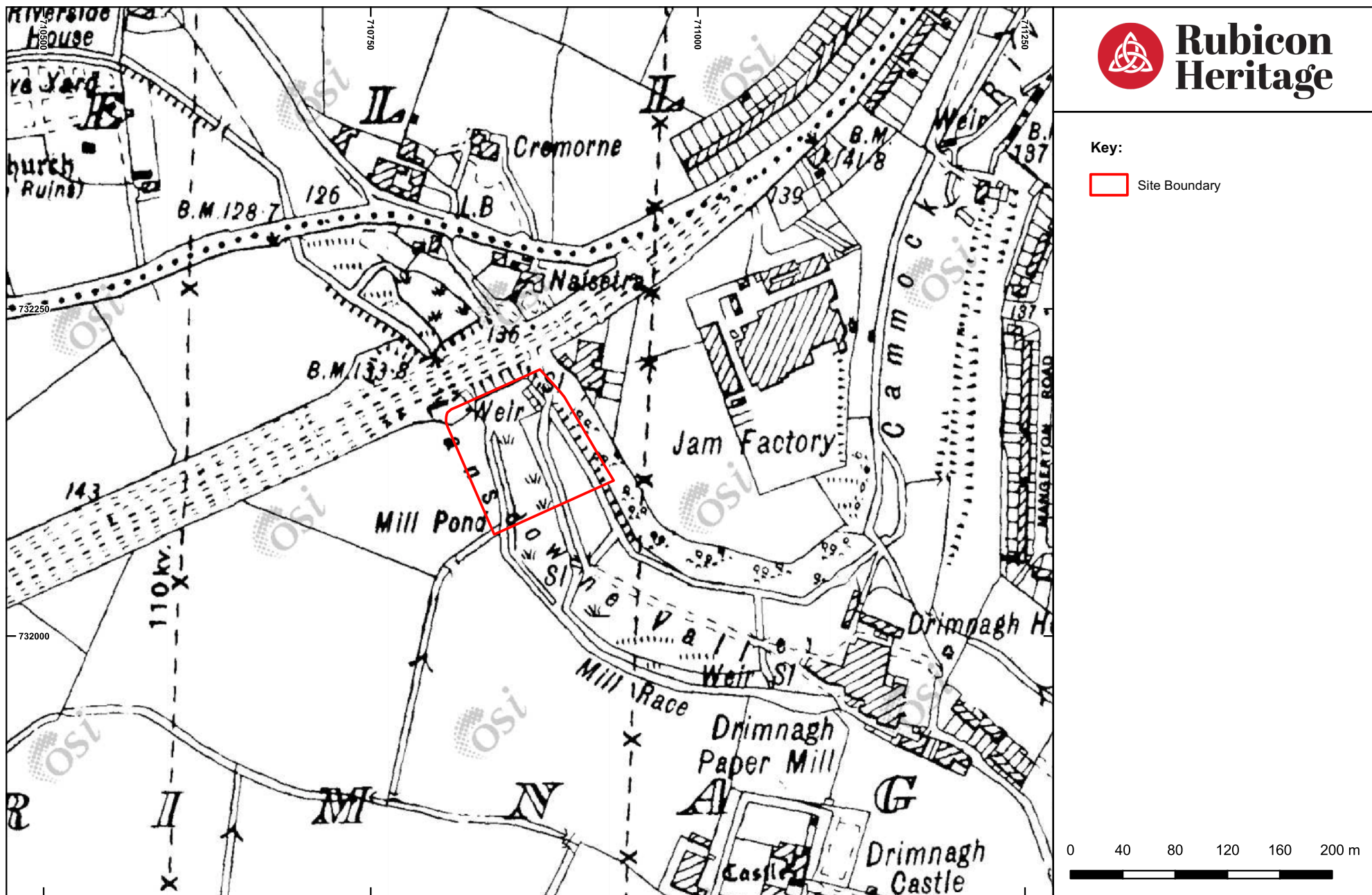


Figure 9 - 6-inch Cassini map showing proposed development site.



Plate 1 - Proposed development site, facing southwest



Plate 2 - Proposed development site, facing ENE



Plate 3 - View facing northwest from proposed development site towards CH001, CH002 & CH006



Plate 4 - View of Carriglea Industrial Site from proposed development site (towards Drimnagh Castle CH005 and CH010-CH014), facing southeast



Plate 5 - View towards Our Lady of the Wayside (CH007), facing north



Plate 6 - View towards Lansdowne House (CH008) and Naistra House (CH016), facing northwest



Plate 7 - View from the proposed development towards Mercedes Benz (CH015), facing WSW



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Appendix 1 – Inventory of identified sites of cultural heritage significance and/or potential within study area

CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
CH001	RMP, PS	DU018-033001-, 5794	Church	The church is located on a distinct rise within a graveyard which is enclosed by a stone wall. A stream runs along the bottom of the graveyard which is N facing. This church was in use in 1547 (Ball 1906, 133). The Book of Reference to the Down Survey (1655-6) mentions the ruins of an old chapel (Simington 1945, 292). Today the W gable is the most prominent feature of the church. Built of roughly coursed masonry using very large blocks and large squared-off quoins. It is a relatively small building (int. dims L 8.5m, Wth 4.4m, T 0.95m) entered through a pointed, segmental W doorway. The interior is lit by a plain rectangular ope with a deeply splayed embrasure above the doorway. There are remains of the S jamb of a window in the SE. A corbel low down on the N wall indicates the extent of collapse in the interior. Building collapse extends for a distance of 5m around the perimeter of the church (Anon 1914, 271; Ball 1906, 132-133).	355	BLUEBELL	Very High	710527	732371
CH002	RMP & PS	DU018-033002-, 5794	Graveyard	The graveyard is enclosed by a stone wall. A stream runs along the bottom of the graveyard which is N facing. The graveyard was in use in	320	BLUEBELL	Very High	710527	732371



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CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
				1547 (Ball 1906, 133). The Book of Reference to the Down Survey (1655-6) mentions the ruins of an old chapel (Simington 1945, 292). (Anon 1914, 271; Ball 1906, 132-133).					
CH003	RMP	DU018-034---	Bridge	The present bridge is on the site of a bridge which is marked on the Down Survey (1655-6) parish map.	190	BLUEBELL, DRIMNAGH	Very High	710674	732306
CH004	RMP	DU018-035---	Water mill - unclassified	The Paper Mill at Drimnagh occupies the site of an earlier mill shown on the Down Survey (1655-6) map compiled and is also mentioned in the Civil survey (1654-6) (Simington 1945, 292). It is located S of the Cammock River and N of Drimnagh Castle. The millrace runs off the Cammock River.	255	DRIMNAGH	Very High	711127	731965
CH005	RMP	DU018-036---	Castle - Anglo-Norman masonry castle	Now located on the grounds of the Christian Brother's monastery and school on the Long Mile Road, this castle is associated with the Barnewall family from the 13th to the early 17th century (Ball 1899, 95-6; Ball 1906, 125-132; Mc Dix 1897, 49-50; Anon 1914, 780). A rectangular moat (L 61m, W 45m) crossed by a stone-arched bridge (1780) on the E side leads onto a three-storey oblong tower incorporating a segmental-arched gateway. It has a projecting stair turret on the S side, lit by slit loops and a flattened arched ope with chamfered jambs. The main chambers of the	312	DRIMNAGH	Very High	711055	731833



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CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
				gate tower are lit by later inserted windows. The gate tower adjoins the S end of a great hall of 14th-16th-century date. This rises to two storeys over a vaulted basement and is entered from the courtyard by an outer staircase. This building has been considerably altered. The N wing rises to two storeys and is of probable 17th century date. An isolated NE tower may be part of the early defences of the castle. Limited excavations in 1992 and 1993 at the NW of the castle within the area enclosed by the moat revealed a stone-filled pit which contained 13th-15th century pottery and a drilled roof slate (Mullins 1993, 14; Mullins 1994, 13).					
CH006	NIAH	50080435	Bluebell Cemetery	Enclosed irregular-plan graveyard, consisting of early graveyard with thirteenth-century church to south, extended to north 1905. Roofless ruinous remains of medieval rubble limestone church, having surviving gable, rubble stone walls, square-headed window opening with chamfered reveals and rubble stone voussoirs to interior, pointed arch door opening with rubble stone voussoirs. Poured concrete paths to later graveyard, converging in centre with limestone shaft. Rock-faced rusticated circular-profile limestone shaft,	400	BLUEBELL	High	710516	732397



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CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
				having cross motif and string courses, set on octagonal-profile plinth. Rubble limestone boundary walls with gateway to south-east corner, having square-profile tooled limestone piers with double-leaf cast-iron gates, giving onto laneway to south to Old Naas Road. Rendered gate piers with cast-iron posts to south end of lane.					
CH007	NIAH & PS	50080436 , 835	Our Lady of the Wayside	Freestanding double-height red brick Roman Catholic church, built 1968, having apse to north with conical roof, lean-to side aisles with flat-roofed confessional projections to east and west elevations, entrance front to south elevation, square-plan five-stage bell-tower to north-east corner, and flat-roofed sacristy to west elevation of chancel. Pitched slate roof to nave having masonry coping, eaves course, cross finial and cast-iron rainwater goods. Pyramidal slate roof to bell tower, having metal cross finial. Red brick walls laid in English garden wall bond over chamfered masonry plinth. Paired round-arched windows with cut masonry surrounds to east and west elevations, having leaded stained glass. Rose window in recessed blind arch to entrance bay, having cut and carved masonry tracery and surround. Round-arched	148	BLUEBELL	Very High	710838	731361



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CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
				windows to front elevation, apse and tower, having masonry surrounds. Round-arched windows to sacristy, in pairs and triples. Unglazed arcades to belfry. Round-headed door openings with carved masonry dressings and timber panelled doors, some leaded overlights and cut granite steps. Interior with altar to north having carved marble altar. Gallery over main entrance, having timber panelled half-glazed double-leaf doors with leaded overlights. Coffered ceilings, barrel-vaulted over side aisles. Arcades to side aisles, having marble-clad octagonal piers. Timber panelled recessed confessionals and carved timber pews. Set in own grounds, bounded by red brick plinth walls with steel railings, steel entrance gates and red brick piers. Located to north of Bluebell Avenue, to east of junction with Naas Road.					
CH008	NIAH	50080437	Lansdowne House	Detached square-plan three-bay two-storey house, built 1952, with quadrant-profile entrance bay to south-east corner of front (south) elevation. Flat roof with oversailing timber eaves. Painted concrete block walls with brown brick plinth course. Square-headed window openings with timber-framed casement windows and concrete sills. Curved	78	DRIMNAGH	High	710850	732271



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CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
				strip window to first floor of entrance bay and glass block window to ground floor. Double-height wrap-around corner window to stair hall to south-east corner. Some replacement uPVC windows. Square-headed door opening to front and rear elevations, having replacement timber panelled door. Painted brick boundary wall and replacement corrugated-iron gates to north to Old Naas Road.					
CH009	NIAH & PS	50080441, 5791	Hollybrook House	Detached three-bay two-storey former house, built c.1900, having full-height canted bay windows with hipped roofs to front (west) elevation, five-bay single-storey extension to rear built c.1940, and three-bay single-storey extension to north. Now in use as offices. Hipped slate roof with stepped red brick chimneystacks to north and south elevations. Red brick walls to front elevation, laid in English garden wall bond, with moulded brick eaves course and plinth course. Lined-and-ruled rendered walls to other elevations. Square-headed window openings having rusticated granite lintel, cut granite sills and early timber casement windows with stained-glass top-lights. Full-width single-storey extension to rear elevation, having horizontal	525	DRIMNAGH	High	711245	732580



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CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
				window band separated by engaged piers. Round-headed porch opening having red brick surround with moulded red, yellow and grey brick voussoirs. Recessed square-headed door opening having half-glazed carved timber panelled door, stained glass sidelights and opaque overlights. Curved granite steps, having 'HOLLYBROOK' mosaic to top step. Recent red brick boundary walls to Naas Road with wrought-iron railings and pedestrian gate to west. Retains interior features					
CH010	NIAH	50080447	Drimnagh Castle (Moat)	Rectangular-plan moat, built c.1400, repaired c.1990, forming protective defence around Drimnagh Castle grounds. Entrance bridge spanning moat, built c.1780, replacing earlier drawbridge structure. Castellated walls of the castle and yard, constructed from local calp limestone and featuring battered buttresses. Stone platform east of the undercroft allowing access to moat via stone steps. Early twentieth-century castellated walls, built c.1904, having openings with brick detailing and pediments, enclosing coach house to south. Steel bridge spanning moat leading to coach house from Drimnagh Castle school grounds. Fed by the Bluebell stream, enclosing castle, courtyard, gardens, stable buildings, work yard, and	268	DRIMNAGH	High	711078	731805



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CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
				coach house. Draining into Lansdowne Valley via sluice gate.					
CH011	NIAH	50080448	Drimnagh Castle (Bridge)	Single-arch bridge, built c.1780, renovated c.1990, spanning moat at castle entrance to east elevation and abutting castle tower. Rubble calp limestone walls with round arch having dressed limestone voussoirs and castellated parapets. Earthen finish to path. Bridge partially reconstructed to north wall, remnants of render finish to south wall.	350	DRIMNAGH	High	711080	731815
CH012	NIAH	50080450	Drimnagh Castle Walled Garden	Rectangular walled garden, laid out c.1900, comprising rubble calp limestone walls to north and east, planted boundary to south and west. Square-profile pier to north-west corner, recent double-leaf gates to east wall, flanked by square-profile piers. Remodelled c.1990, with formal planting. Remains of square-plan single-bay tower to paddock to north. Situated to east of central courtyard.	301	DRIMNAGH	High	711034	731828
CH013	NIAH & PS	50080451	Drimnagh Castle/ Fortified House	Freestanding rectangular-plan multiple-bay three-storey castle, built c.1400, consisting of undercroft, great hall and gallery, with square-plan four-stage sixteenth century keep to south. Site enclosed by moat. Partly rebuilt and renovated c.1985. Replacement oak truss pitched slate roof over Great Hall, hipped to north, having shaped stone parapet, fumerelle	347	DRIMNAGH	Very High	711073	731824



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CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
				and brick chimney to north gable. Replacement hipped slate roof over tower, having castellated parapet with stone battlements and brick chimney to south elevation. Billested stone moulding to base of parapet of main block. Cut stone string course to tower. Reconstructed window openings to main block and tower, featuring cut limestone surrounds, having replacement cut and carved tracery and leaded glass. Square-headed openings to great hall, east and west elevations, openings to east having brick pediment. Paired round-headed lancet windows to tower, east and west elevations, lower pair having brick pediment. Loop windows to tower, south elevation. Entrance to inner courtyard via integral arch through tower. Lowered pointed arch entrance opening to undercroft having limestone voussoirs and replacement timber door. First floor gabled stone entrance porch and steps built c.1780 allowing access from courtyard to great hall. Fourteenth-century undercroft having vaulted ceiling with remains of wicker centering, embrasure windows, sixteenth-century hearth, smoker and bain marie. Stone staircases to south and north-east allow access					



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CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
				to great hall, having seventeenth-century hearth and reconstructed oak truss roof and gallery. Sixteenth-century tower features lookout turrets to the south and west.					
CH014	NIAH	50080464	Drimnagh Castle Barn and Stable Buildings	Detached rectangular-plan five-bay two-storey former barn and stable buildings, built c.1650, with eighteenth-century and early twentieth-century alterations, having first floor bridge connection to Drimnagh Castle Great Hall to east elevation. Currently in use as office and workshop. Pitched slate roof, hipped to east end, with yellow brick chimneystack having clay chimney pots, castellated parapet having circular opening, and cast-iron rainwater goods. Rubble calp limestone walls. Square-headed window openings with chamfered granite sills to front (south) and west elevations, yellow brick block-and-start surrounds having pediments, and six-over-six pane timber sash windows. Pair of segmental-headed window openings flanking main entrance having six-over-six pane timber sash windows with margin sashes. Square-headed window openings to rear elevation, blocked. Loop windows to with chamfered surrounds to both elevations of bridge to Great Hall. Square-headed door	315	DRIMNAGH	High	711062	731837



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CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
				openings to front elevation, having yellow brick block-and-start surrounds with pediments and replacement timber doors, opening to east having nosed granite steps and metal handrails, leading to raised podium on external stone staircase to the Great Hall. Square-headed door opening under bridge, having cut limestone surround and double-leaf timber panelled doors. Square-headed door openings to rear elevation, blocked. Located within the grounds of Drimnagh Castle, west of the main castle building, having courtyard to south, walled garden to west and paddock to north.					
CH015	NIAH & PS	50080484, 5792	Mercedes Benz	Detached thirty-nine-bay double-height factory, built c.1950, comprising central square-plan tower with stepped corners flanked by projecting five-bay blocks with curved corners, in turn flanked by fourteen-bay blocks. Attached sawtooth-roofed block to south, and attached saw tooth roofed block to east. Flat roof with red brick parapet having ceramic copings. Red brick parapet with ceramic string course and digital clocks to tower, topped by rotating Mercedes symbol. Red brick walls laid in English garden wall bond, with ceramic tiled pilasters flanking	468	DRIMNAGH	Very High	710338	731898



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CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
				openings, having tiled lintels and sills. Metal fittings to openings, many recently replaced and with recent curved glazing to entrance. Various related buildings to south. Rendered boundary plinths and piers with cast-metal railings and gates.					
CH016	PS	5793	Naisetra House	Naistera House, Naas Road, Old, Dublin 12	70	BLUEBELL	Very High	710877	732267
CH017	CA	N/A	Conservation Area	Driminagh Castle	230	DRIMNAGH	Very High	711051	731827
CH018	CA	N/A	Conservation Area	Landsdowne Valley Park	208	DRIMNAGH	Very High	711212	732035
CH019	UCH	N/A	Millrace	Millrace depicted on Ordnance Survey Mapping	N/A	DRIMNAGH	Medium /low	710834	732135
CH020	UCH	N/A	Millpond	Millpond depicted on Ordnance Survey Mapping	N/A	DRIMNAGH	Medium /low	710860	732135
CH021	UCH	N/A	Former road	Former road depicted on Ordnance Survey Mapping	N/A	DRIMNAGH	Medium /low	710884	732133
CH022	UCH	N/A	Sluice gate	Sluice gate depicted on Ordnance Survey Mapping	N/A	DRIMNAGH	Medium /low	710869	732190
CH023	UCH	N/A	Weir	Weir depicted on Ordnance Survey Mapping	N/A	DRIMNAGH	Medium /low	710871	732178
CH024	UCH	N/A	Camac River	Camac River depicted on Ordnance Survey Mapping	N/A	DRIMNAGH	Medium /low	710912	732130
CH025	TB	N/A	Townland Boundary	Townland Boundary between Bluebell and Driminagh	115	BLUEBELL, DRIMNAGH	Medium /low	710722	732735



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CH No.	Category	ID	Summary	Description	Distance from site (m)	Townland	Baseline Value	ITM E	ITM N
CH026	IH	N/A	Woollen Mill	The site of a woollen mill depicted on OS mapping of Bluebell Avenue survives as a lower section of random coursed limestone wall remaining to north boundary of the current site.	395	BLUEBELL	Medium /High	710580	732495
CH027	IH	N/A	Bridge	Site of a bridge depicted on OS mapping	185	BLUEBELL	Medium /low	710684	732311
CH028	IH	N/A	Bridge	Former bridge on River Camac	28	DRIMNAGH	Medium /low	710805	732199
CH029	IH	N/A	Driminagh paper Mill	Former Mill	265	DRIMNAGH	Medium /low	711126	732035
CH030	IH	N/A	Jam Factory	Former Jam Factory off the Naas Road	115	DRIMNAGH	Medium /low	711064	732227
CH031	IH	N/A	Printing Office	Former printing office depicted on OS mapping	370	DRIMNAGH	Medium /low	711220	732339
CH032	AAP	N/A	Development Site	The site contains six cultural heritage receptors in addition to a culverted section of the Camac and can be considered an AAP	N/A	DRIMNAGH	High	710855	732147

Note: The abbreviations that have been used for the 'Category' section are as follows:

RMP: Recorded archaeological monument
 PS: Protected Structure
 NIAH: Site recorded in NIAH
 ACA: Architectural Conservation Area

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UBH: Unregistered built heritage site
 UCH (1): Unregistered cultural heritage site that comprises extant remains
 UCH (2): Unregistered cultural heritage site that does not comprise extant remains
 TB: Townland boundary
 AAP: Area/feature of archaeological potential

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Appendix 2 Previous archaeological investigations

An examination of previous excavations carried out within and around the area proposed for development provides a useful framework for assessment of the study area in terms of its archaeological significance as well as its archaeological potential. The Archaeological Excavations Bulletin is an annual fieldwork gazetteer for Irish Archaeology; it was checked for a record of any licensed archaeological investigations carried out in the vicinity of the development area between 1970 and 2017.

County: Dublin **Site name:** DRIMNAGH CASTLE, Ballyfermot

Sites and Monuments Record No.: N/A Licence number: —

Author: Clare Mullins

Site type: Castle - Anglo-Norman masonry castle

Period/Dating: Multi-period

ITM: E 710827m, N 731827m

Excavations at Drimnagh Castle were carried out from 10th–21st August as part of the Rathmichael Historical Society's annual summer school. A castle has stood on this site since the 13th century but the present structures date to a number of different building periods. The castle also has a flooded moat which may be original.

An excavation trench measuring 8m x 2m was located north-west of the castle buildings in an area enclosed by the moat. A 0.2m depth of recent deposit was identified overlying another modern but distinct layer. Underneath the latter, an area of very rough cobbling was uncovered. This cobbled area was most concentrated in the east of the trench. A test pit inserted north-east of the main trench appeared to locate the eastern extent of this cobbled spread. That this surface dated to no earlier than the late 19th century is attested by the relatively modern pottery associated with it. Removal of the roughly cobbled layer in the test trench revealed a layer of brown sandy clay about 0.1m in thickness. Underneath this lay a deposit of mortar which extended over the entire area of the test trench. Next year it is intended to extend the main trench both northwards towards the moat and eastwards to incorporate the test trench. Amongst the modern pottery found, a few sherds of medieval pottery were identified as well as a fragment of a ceramic wig curler. These probably represent displaced finds within the relatively recent deposits.

County: Dublin **Site name:** DRIMNAGH CASTLE, Drimnagh

Sites and Monuments Record No.: N/A Licence number: 92E0114

Author: Clare Mullins

Site type: Castle - Anglo-Norman masonry castle

Period/Dating: Late Medieval (AD 1100-AD 1599)

ITM: E 711131m, N 731773m

The second season of excavations at Drimnagh Castle was carried out from 9th August to 28th August. The excavation was carried out in conjunction with and funded by Rathmichael Historical Society's summer school. This year the excavation trench was extended northwards towards the moat which surrounds the castle. The northernmost 3m was extended 2m eastwards, thus creating an L-shaped trench measuring 10m north-south, 2m east-west at the southern end and 4m east-west at the northern end.

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Excavations in 1992 had revealed an old stony ground surface which appeared to date approximately to the turn of the century (Excavations 1992, 14). Removal of the base of this stony layer in 1993 produced a mixture of modern delph, three sherds of 17th-century sgraffito ware and some locally made ware of 13th-15th-century date. The total depth of the stony layer measured approximately 0.25m.

Directly under this stony horizon lay a layer of brown sod-like material. This layer was most clearly defined and of greatest depth on the east side of the trench. It was less concentrated on the west of the trench where it quickly peeled away to reveal the natural boulder clay. Removal of this sod-like material on the east revealed a similar but slightly stonier version of the same. The latter occupied a hollow in the boulder clay, the western edge of which ran north-south down the centre of the trench. The eastern extent of this hollow was lost under the eastern baulk. Towards the north this hollow formed a bottleneck before flaring out again on either side. Both these soddy layers produced exclusively Medieval pottery.

A roughly circular area of damp soil in the northern end of the above mentioned hollow proved to be the top of a funnel-shaped pit cut into the natural clay. This pit was approximately 1m in diameter at the top and 1m in depth. It was filled with stone. Included amongst the stony fill was a drilled roof slate and two sherds of 13th- to 15th-century pottery.

While these features were being examined, the level of the newly opened northern extension was reduced in spits. This area proved to be completely disturbed right down to the boulder clay at a depth of approximately 1m.

It is possible that the stone-filled pit acted as a soakage sump and that the stratigraphically associated hollow in the boulder clay functioned as a gully, draining water into the sump. On excavation, the top of the pit coincided with the present water table.

County: Dublin **Site name:** DRIMNAGH CASTLE, Drimnagh
Sites and Monuments Record No.: N/A Licence number: 93E0183
Author: Rónán Swan
Site type: Castle - Anglo Norman masonry castle
Period/Dating: Late Medieval (AD 1100-AD 1599)
ITM: E 711131m, N 731773m

The archaeological trial trenching at Drimnagh took place over a period of two weeks commencing on 22nd November. The purpose for the trenching was to investigate the archaeological impact of the proposed construction of a workshop in a yard to the south of the tower. The trial trenching was funded by FÁS and the Drimnagh Castle Restoration Committee undertook to finance the post-excavation.

Due to the proximity of the tower it was felt that machine clearance would be unsuitable and thus the trenching was carried out manually. Given the requirements for the construction of the workshops, the trial trenches had to be dug to a depth exceeding the maximum depth of construction. Thus, as the desired depth is 0.4m, the average excavated depth was 0.6m. Two trenches were dug: a longitudinal trench extending north-south and a lateral trench extending east-west. No archaeological material was recovered from either trench and the evidence for activity within the yard reflected the renovations carried out by Louis Hatch to the surrounding wall and the construction of the coach house built earlier this century.

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County: Dublin **Site name:** Drimnagh Castle, Drimnagh

Sites and Monuments Record No.: DU018-035 **Licence number:** 04E1673

Author: Eoin Sullivan, for Margaret Gowen & Co. Ltd, 27 Merrion Square, Dublin 2.

Site type: Watermill (site)

Period/Dating: —

ITM: E 711139m, N 731966m

The site of the development was the former Drimnagh Industrial Estate, located to the north of Drimnagh Castle. The topographically higher southern portion of the site was closest to Drimnagh Castle and the lower southern portion contained the bed of the Cammock River. The development consists of 241 dwellings, a crèche, 132 living/working units and office accommodation.

The site of a watermill was indicated on the development site. The Drimnagh paper mill marked on the OS maps probably occupies the site of the mill marked on the Down Survey maps of 1655. The Civil Survey of 1654 mentions a mill at Drimnagh, along with a habitable castle and chapel.

The southern half of the site had been scarped in the past to enable the construction of the buildings of the industrial estate. The northern portion contained a concrete slab covering, which was retained as part of the development. The entire site was assessed on the basis of twelve mechanically excavated test-trenches. Nearly all the trenches revealed modern disturbed ground. No features or soils of archaeological significance were encountered during the excavation of the trenches.

Subsequent monitoring of the groundworks associated with the removal of the standing buildings and lowering of the ground level at the southern portion of the site did not reveal any features of archaeological significance.

County: Dublin **Site name:** Aldi, Longmile Road, Drimnagh

Sites and Monuments Record No.: - **Licence number:** 05E0629

Author: William O. Frazer, Margaret Gowen & Co. Ltd, 27 Merrion Square, Dublin 2.

Site type: No archaeological significance.

Period/Dating: —

ITM: E 710845m, N 731779m

Monitoring of ground reduction in July–August 2005 and January–April 2006 was carried out, due to the proximity of the development site to Drimnagh Castle (DU018-036). Truncated natural was encountered at depths of 0.25–0.5m below ground level, a consequence of the construction of the late 20th-century factory that previously occupied the site. No significant archaeology was identified.

County: Dublin **Site name:** DRIMNAGH CASTLE, Drimnagh

Sites and Monuments Record No.: N/A **Licence number:** 93E0183

Author: Rónán Swan

Site type: Castle - Anglo-Norman masonry castle

Period/Dating: Multi-period

ITM: E 710827m, N 731827m

Archaeological test trenching took place at Drimnagh Castle over a period of a month commencing in late January 1994. The project was funded jointly by FÁS and the Drimnagh Castle Restoration Committee. The reason for the trenching was to investigate the archaeological impact of the proposed construction of washrooms. The proposed washrooms will encompass an area approximately 8m by 10m. The trenching was carried out on the site of a demolished outhouse, on the northern side of the ballroom building. In consultation with the Office of Public Works it was decided that two trenches

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1.5m wide and 1.5m deep would provide a sufficiently representative sample of the area. The two trenches were dug following the line of the proposed north and western walls.

The Northern Trench had three distinct layers, the uppermost being approximately 1.5m deep. This material appeared to have been mainly garden soil, which was well sorted. The remains of a dog were recovered from this layer although its association with a sherd of willow pattern suggests a modern date. A possible pathway was identified underneath this layer and an associated drain leading from the original stables. At the base of this layer appears to be the natural, deposited as part of glacial activity.

There were three principle layers within the Western Trench, although there was a certain amount of disturbance adjacent to the wall of the ballroom.

The presence of medieval pottery from this trial trenching suggests medieval activity on the site, although none of the contexts within which they appear can be considered as archaeologically significant. The presence of clay pipes, brick, mortar and a variety of glass indicates that these layers have been disturbed or are of a post-medieval date. The lower ground level of the southern end of the western trench reflects the use of the area in recent times as a chicken shed. This lean-to was demolished within the past twelve months. The evidence from the path and drain suggests that they probably date from the late 1700s and were constructed to facilitate work within the stables.

County: Dublin **Site name:** Carriglea Industrial Estate, Muirfield Drive, Naas Road, Drimnagh, Dublin 12

Sites and Monuments Record No.: N/A Licence number: 17E0373

Author: Thaddeus Breen; Shanarc Archaeology Ltd.

Site type: Urban

Period/Dating: —

ITM: E 710939m, N 732064m

Archaeological test excavations were undertaken at Carriglea Industrial Estate, Muirfield Drive, Naas Road, Drimnagh, Dublin 12, between 31 October and 9 November 2017. Testing was carried out as required by conditions of the Grant of Planning Permission P3470 of Dublin City Council, for a proposed residential development with associated amenities.

Eight test trenches were excavated across the site, each one in the location of one of the proposed housing blocks. Two further planned trenches could not be excavated as they were in a part of the site still occupied by a tenant. The trenches were excavated with a 2m-wide toothless bucket, with a narrower toothed bucket being used in areas where the modern fill extended to a depth greater than 2m. The trenches were 28-55m in length, and were investigated to a maximum depth of 5m.

The site was originally part of the curving valley of a small river, 60m from the thirteenth-century Drimnagh Castle. There was a mill 80m downstream from at least the seventeenth century, but probably for at least as long as the castle was present.

The Carriglea Industrial Estate was built in the 1970s on a new, level land surface produced by infilling the valley at this point and culverting the river. The fill, which is reported to be 10m deep in places, consists of various types of rubble and soil, probably brought from a number of different locations. The infilled valley comprises about five-sixths of the area in the site. Only in two trenches, 2 and 4, was the side of the valley encountered. In Trenches 1, 5-7 and 9 the bottom of the fill was not reached. These

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were dug to a maximum depth of 5m. The mill-wheel pieces, bricks and cut stone from these deposits are from mixed rubble of unknown provenance, and probably have no prior connection with the site. The remaining one-sixth of the area of the site, in the eastern part of the site, is on what was the higher ground next to the valley. The original ground surface appears to have been little altered apart from the removal of the sod layer. Traces of spade cultivation furrows have survived.

Nothing relating to Drimnagh Castle was uncovered. The infilling of the valley means that the area with the greatest potential for archaeology is buried up to 10m beneath the surface and was probably disturbed in the course of infilling.

County: Dublin **Site name:** MEÁNSCOIL IOGNAID RÍS CBS, DRIMNAGH CASTLE, DRIMNAGH
Sites and Monuments Record No.: SMR 18:36 **Licence number:** 98E0183

Author: James Eogan, Archaeological Development Services Ltd, Windsor House, 11 Fairview Strand, Fairview, Dublin 3.

Site type: Vicinity of medieval castle

Period/Dating: —

ITM: E 710987m, N 731787m

Test excavations took place over a number of days on the site of a proposed extension to the existing Scoil Iognaid Rís CBS, Drimnagh Castle, in response to a planning condition. The proposed extension will be c. 40m south-west of Drimnagh Castle in an area where a 17th-century bastion may have stood. Two trenches were excavated in the areas of maximum anticipated disturbance. A stone-surfaced trackway of 17th/18th-century date, oriented south-west/north-east, was uncovered in Trench 1. Evidence of post-medieval ploughing was also uncovered. No earlier features were found within the test-trenches. In view of the possibility of further archaeological remains surviving on the site of the proposed extension, archaeological monitoring of subsurface works associated with the development has been recommended.

County: Dublin **Site name:** Long Mile Road, Drimnagh

Sites and Monuments Record No.: N/A **Licence number:** 01E0028

Author: Georgina Scally, 81 Upper Leeson Street, Dublin 4, for Margaret Gowen and Co. Ltd.

Site type: No archaeological significance

Period/Dating: —

ITM: E 710592m, N 731663m

Test excavation in advance of an industrial development on a site adjacent to Drimnagh Castle was carried out in January 2001. Six trenches were excavated by mechanical digger. In no trench were finds, features or structures of any archaeological significance uncovered.

County: Dublin **Site name:** Meanscoil Iognaid Rís, CBS, Drimnagh Castle, Drimnagh

Sites and Monuments Record No.: SMR 18:36 **Licence number:** 03E1004

Author: Rosanne Meenan and Deire Leahy, ADS Ltd, Windsor House, 11 Fairview Strand, Dublin 3.

Site type: No archaeological significance

Period/Dating: —

ITM: E 711676m, N 732392m

This work was carried out before the construction of a new changing-room facility at Meanscoil Iognaid RAs, CBS, Drimnagh. The area is located partially within the zone of archaeological potential surrounding Drimnagh Castle, hence the requirement for monitoring. A series of trenches was excavated across the site, none of which produced any archaeological material or features.

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Appendix 3 Legislative and Policy framework

EIA Legislation

EIA Directive 85/337/EEC as amended by 97/11/EC, 2003/35/EC and 2009/31/EC requires that certain developments be assessed for likely environmental effects before planning permission can be granted. This original directive and its amendments were consolidated informally in EIA Directive 2011/92/EU and further amended 2014/52/EU.

Directive 2014/52/EU that among other factors, information is to be provided on:

‘cultural heritage, including architectural and archaeological aspects’ (Annex IV, Section 3)

Each of these assets is addressed within this assessment report.

Cultural Heritage Legislation

Archaeological Monuments/Sites

Archaeological heritage is protected primarily under the National Monuments Acts 1930-2004. Section 2 of the 1930 National Monuments Act defines the word ‘monument’ as including:

‘any artificial or partly artificial building, structure, or erection whether above or below the surface of the ground and whether affixed or not affixed to the ground and any cave, stone, or other natural product whether forming part of or attached to or not attached to the ground which has been artificially carved, sculptured or worked upon or which (where it does not form part of the ground) appears to have been purposely put or arranged in position and any prehistoric or ancient tomb, grave or burial deposit, but does not include any building which is for the time being habitually used for ecclesiastical purposes’.

Under the 1994 Act, provision was made for a Record of Monuments & Places (RMP). The RMP is a revised set of SMR (Sites and Monuments Record) maps, on which newly-discovered sites have been added and locations which proved not to be of antiquity have been de-listed by the National Monuments Service.

In effect, the National Monuments Acts 1930-2004 provide a statutory basis for:

- Protection of sites and monuments (RMPs)
- Sites with Preservation Orders
- Ownership and Guardianship of National Monuments
- Register of Historic Monuments (pre-dating 1700AD)
- Licensing of archaeological excavations
- Licensing of Detection Devices
- Protection of archaeological objects
- Protection of wrecks and underwater heritage (more than 100 years old)

In relation to proposed works at or in the vicinity of a recorded archaeological monument, Section 12 (3) of the National Monuments (Amendment) Act 1994 states:

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‘When the owner or occupier (not being the Commissioners) of a monument or place which has been recorded [in the Record of Monuments and Places] or any person proposes to carry out, or to cause or permit the carrying out of any work at or in relation to such monument or place, he shall give notice in writing of his proposal to carry out the work to the Commissioners and shall not, except in the case of urgent necessity and with the consent of the Commissioners, commence the work for a period of two months after having given the notice.’

Archaeological artefacts

Section 2 of the 1930 National Monuments Act (amended) defines an archaeological object as (in summary) any chattel in a manufactured or partly manufactured state or an unmanufactured state but with an archaeological or historical association. This includes ancient human, animal or plant remains.

Section 9 (1) of the National Monuments (Amendment) Act 1994 states that any such artefact recovered during archaeological investigations should be taken into possession by the licensed archaeological director and held on behalf of the state until such a time as they are deposited accordingly subsequent to consultation with the National Museum of Ireland.

Architectural Sites

In 1997 Ireland ratified the Granada Convention on architectural heritage. This provided the basis for a national commitment to the protection of the architectural heritage throughout the country. The Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999 and Local Government (Planning and Development) Act 2000 made the legislative changes necessary to provide for a strengthening of the protection of architectural heritage. The former Act has helped to provide for a forum for the strengthening of architectural heritage protection as it called for the creation of a National Inventory of Architectural Heritage which is used by local authorities for compiling the Record of Protected Structures (RPS). The Record of Protected Structures (RPS) is set out in each respective county’s Development Plan and provides statutory protection for these monuments.

Section 1 (1) of the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999 states:

‘architectural heritage means all –

- (a) structures and buildings together with their settings and attendant grounds, fixtures and fittings,
- (b) groups of such structures and buildings, and
- (c) sites, which are of architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest”

The 1999 Act was replaced by the Local Government (Planning and Development) Act 2000 where the conditions relating to the protection of architectural heritage are set out in Part IV of the Act. Section 57 (1) of the 2000 Act states that:

‘...the carrying out of works to a protected structure, or a proposed protected structure, shall be exempted development only if those works would not materially affect the character of –

- (a) the structure, or
- (b) any element of the structure which contributes to its special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest’

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Policy Framework

Dublin City Development Plan 2022–2028

Chapter 11 Built Heritage and Archaeology

BHA1 Record of Protected Structures

- A) To include those structures that are considered to be of special architectural, historical, archaeological, artistic, cultural, scientific, technical or social interest in the Record of Protected Structures, and to remove those structures where protection is no longer warranted.
- B) To maintain and review the RPS whilst having regard to recommendations for additions to the RPS made by the Minister under Section 53 of the Planning and Development Act, 2000 (as amended).

BHA2 Development of Protected Structures:

That development will conserve and enhance Protected Structures and their curtilage and will:

- A) Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011) published by the Department of Culture, Heritage and the Gaeltacht.
- B) Protect Structures included on the RPS from any works that would negatively impact their special character and appearance.
- C) Ensure that works are carried out under supervision of a suitably qualified person with expertise in architectural conservation.
- D) Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.
- E) Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and ensure that new development does not adversely impact the curtilage or the special character of the Protected Structure.
- F) Respect the historic fabric and the special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials.
- G) Ensure that new and adapted uses are compatible with the architectural character and special interest(s) of the Protected Structure.
- H) Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.
- I) Ensure historic landscapes, gardens and trees (in good condition) associated with Protected Structures are protected from inappropriate development.
- J) Have regard to ecological considerations for example, protection of species such as bats.

BHA3 Loss of Protected Structures

That the City Council will resist the total or substantial loss of Protected Structures in all but exceptional circumstances

BHA4 Ministerial Recommendations

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To have regard to the National Inventory of Architectural Heritage (NIAH) rating of a structure and any associated Ministerial Recommendation in the assessment of planning applications.

BHA5 Demolition of Regional Rated Building on NIAH

That there is a presumption against the demolition or substantial loss of any building or other structure assigned a 'Regional' rating or higher by the National Inventory of Architectural Heritage (NIAH), unless it is clearly justified in a written conservation assessment that the building has no special interest and is not suitable for addition to the City Council's Record of Protected Structures (RPS); having regard to the provisions of Section 51, Part IV of the Planning and Development Act, 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

BHA6 Buildings on Historic Maps

That there will be a presumption against the demolition or substantial loss of any building or other structure which appears on historic maps up to and including the Ordnance Survey of Dublin City, 1847. A conservation report shall be submitted with the application and there will be a presumption against the demolition or substantial loss of the building or structure, unless demonstrated in the submitted conservation report this it has little or no special interest or merit having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

BHA7 Architectural Conservation Areas

- To protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA 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. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA. Please refer to Appendix 6 for a full list of ACAs in Dublin City.
- Ensure that all development proposals within an ACA contribute positively to the character and distinctiveness of the area and have full regard to the guidance set out in the Character Appraisals and Framework for each ACA.
- Ensure that any new development or alteration of a building within an ACA or immediately adjoining an ACA is complementary and/or sympathetic to their context, sensitively designed and appropriate in terms of scale, height, mass, density, building lines and materials and that it protects and enhances the ACA. Contemporary design which is in harmony with the area will be encouraged.
- Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture.
- Promote sensitive hard and soft landscaping works that contribute to the character and quality of the ACA.
- Promote best conservation practice and encourage the use of appropriately qualified professional advisors, tradesmen and craftsmen, with recognised conservation expertise, for works to buildings of historic significance within Architectural Conservation Areas.

All trees which contribute to the character and appearance of an Architectural Conservation Area, in the public realm, will be safeguarded, except where the tree is a threat to public safety, prevents

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universal access or requires removal to protect other specimens from disease.

BHA8 Demolition in an ACA

There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the ACA except in exceptional circumstances where such loss would also contribute to a significant public benefit.

BHA9 Conservation Areas

To protect the special interest and character of all Dublin's Conservation Areas – identified under Z8, Z2 zoning objectives and denoted by red line conservation hatching on the zoning maps. 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 important features.
- 3 Improvement of open spaces and the wider public realm and reinstatement 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.
- 6 Retention of buildings and features that contribute to the overall character and integrity of the Conservation Area.
- 7 The return of buildings to residential use.

Changes of use will be acceptable where in compliance with the zoning objectives and where they make a positive contribution to the character, function and appearance of the Conservation Areas and its setting. 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.

BA10 Demolition in a Conservation Area

There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of a Conservation Area, except in exceptional circumstances where such loss would also contribute to a significant public benefit.

BHA11 Rehabilitation and Reuse of Existing Older Buildings

- (a) To retain, where appropriate, and encourage the rehabilitation and suitable adaptive reuse of existing older buildings/structures/features, which make a positive contribution to the character and appearance of the area and streetscape in preference to their demolition and redevelopment.
- (b) Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts (including signage and associated features), pub fronts and other significant features.

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- (c) Ensure that appropriate materials are used to carry out any repairs to the historic fabric.

BHA12 Industrial, Military and Maritime, Canal-side and Rural Heritage

To promote the awareness of Dublin's industrial, military and maritime, canal-side (including lock-keepers' dwellings), rail and rural (vernacular) heritage.

BHA13 Maritime Heritage and Maritime Villages

To support maritime heritage in built form, to foster initiatives that give expression to the maritime heritage of Dublin City, including trails, features and public realm design and to promote and develop the character and heritage of coastal and maritime villages.

BHA14 Mews

To promote the redevelopment and regeneration of mews lanes, including those in the north and south Georgian core, for sensitively designed, appropriately scaled, infill residential development, that restores historic fabric where possible and that removes inappropriate backland car parking areas.

BAH15 Twentieth Century Buildings and Structures

- (a) To encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised.
- (b) To encourage the retention and reinstatement of internal and external features that contribute to the character of exemplar twentieth century buildings, such as roofscapes, boundary treatments, fenestration pattern, materials, and other features, fixtures and fittings (including furniture and art work) considered worthy of retention.

BHA16 Industrial Heritage

To have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCIHR) in the preparation of Local Area Plans and the assessment of planning applications To review the DCHIR in accordance with Ministerial recommendations arising from the National Inventory of Architectural Heritage (NIAH) survey of Dublin City.

BHA17 Industrial Heritage of Waterways, Canals and Rivers

To support and promote a strategy for the protection and restoration of the industrial heritage of the city's waterways, canals and rivers, including retaining features such as walls, weirs and millraces, and the graving dock structures at Ringsend.

BHA18 Historic Ground Surfaces, Street Furniture and Public Realm

- (a) To protect, conserve and retain in situ historic elements of significance in the public realm including milestones, jostle stones, city ward stones, bollards, coal hole covers, gratings, boot scrapers, cast iron basement lights, street skylights and prisms, water troughs, street furniture, post boxes, lampposts, railings and historic ground surfaces including stone kerbs, pavement flags and setts and to promote conservation best practice and high standards for design, materials and workmanship in public realm improvements within areas of historic character,

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having regard to the national Advice Series on 'Paving: The Conservation of Historic Ground Surfaces' (2015).

- (b) To maintain schedules of stone setts, historic kerbing and historic pavers/flags, and associated features in the public realm, to be protected, conserved or reintroduced (Appendix 6), and to update and review these schedules during the period of this development plan.

BHA19 Historic Street Furniture and the RPS

To maintain a schedule of features in the public realm identified for protection in Appendix 6 whilst also having regard to recommendations for additions to the RPS made by the Minister for such structures under Section 53 of the Planning and Development Act, 2000 (as amended).

BHA20 Ghost Heritage Signs

To seek the retention and maintenance of heritage signs and advertising through the city, where appropriate.

BHA21 Retrofitting Sustainability Measures

To have regard to the Department of Environment, Heritage and Local Government's publication on Energy Efficiency in Traditional Buildings (2010) and the Irish Standard IS EN 16883:2017 Conservation of Cultural Heritage Guidelines for Improving the Energy Performance of Historic Buildings (2017) and any future updates or advisory documents in assessing proposed works on heritage buildings.

BHA22 Upgrading Environmental Performance

To ensure a sustainable future for historic and other buildings subject to heritage protection, the City Council will encourage and support works to upgrade the environmental performance of the existing building stock that incorporates good standards of design and appearance. Where these works involve historic buildings subject to protection (this includes buildings referenced on the Record of Protected Structures and non-protected structures in an Architectural Conservation Area), the works shall not adversely affect the special interest of the structure and thus a sensitive approach will be required, taking into account:

- The significance of the structure, and
- The extent of intervention, including impact on historic fabric, the technical requirements of a traditionally constructed building, visibility, siting and design.

The installation of renewable energy measures and equipment will be acceptable where sited and designed to minimise the visual impact and does not result in any significant loss of historic fabric or otherwise affect the significance of the structure.

BHA23 Climate Action

To co-operate with other agencies in the investigation of climate change on the fabric of historic buildings and to enhance adaptive capacity, strengthen resilience and reduce the vulnerability of heritage in line with the National Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2020).

BHA24 Reuse and Refurbishment of Historic Buildings

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Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by ensuring the delivery of high quality architecture and quality place-making, and by demonstrating best practice in the care and maintenance of historic properties in public ownership.

BHA25 Loss of Upper Floor Access

There will be a presumption against the loss of upper floor access to buildings from street frontages, and the City Council will seek reinstatement of upper floor access points wherever possible from the street.

BHA26 Archaeological Heritage

1. To protect and preserve Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994 which have been identified in the Record of Monuments and Places and the Historic Environment Viewer (www.archaeology.ie) and all wrecks over 100 years old including those in the Shipwreck Inventory of Ireland.
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 Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994.
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; all wrecks and associated objects over 100 years old 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 the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994, notification of sites over 0.5 hectares size with potential underwater impacts 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 Housing, Local Government and Heritage and be subject to an appropriate level of archaeological assessment

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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.

BHA27 Dublin City Heritage Plan

To implement the current Dublin City Heritage Plan and to support the preparation and implementation of the Dublin City Strategic Heritage Plan 2022-2028.

BHA28 Historic Place and Street Names

To preserve historic place and street names and ensure that new street names reflect appropriate local archaeological, historical or cultural associations.

BHA29 World Heritage Nomination

To support and pursue a World Heritage nomination for the Historic City of Dublin, in partnership with the Department of Housing, Heritage and Local Government.

BHA30 Moore Street National Monument

To co-operate with, and facilitate, the state in its preservation of the National Monument at 14-17 Moore Street on a joint venture basis, and to support the retention and refurbishment of the cultural quarter associated with 1916 on Moore Street and taking account of the contents and relevant recommendations of the Moore Street Advisory Group Report to the Minister for Heritage and Electoral Reform and the minister's response.

BHA31 St. Sepulchre's Palace Complex

To work with all stakeholders and interested parties to develop a Conservation Plan to safeguard the future of St. Sepulchre's Palace complex (Kevin Street Garda Station), identify appropriate future use(s) that reflect its historic and architectural importance and unlock the cultural tourism potential of the site in the context of the cathedral quarter and the historic city.

BHA32 Water Related Heritage Strategies

To support the creation and implementation of water- related heritage strategies in partnership with restoration and enhancement of river and canal corridors within the city.

BHA33 Dublin Port Heritage Quarter

To support the vision of the Dublin Port Company for the Flour Mill and surrounding heritage assets of the port to deliver a new cultural heritage quarter and maritime museum for the city, that documents Dublin's rich maritime history and the social history of the Dock workers.

BHA34 OPW Historic Sites

To co-operate with and facilitate the Office of Public Works to improve visitor experience/interpretation and upgrade key historic sites, including the Dublin Castle complex, St. Sepulchre's Palace complex, Werburgh Street/Ship Street, the Debtors Prison, Royal Hospital at Kilmainham, the Irish National War

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Memorial Gardens and Commemorative Bridge, Phoenix Park (including the Built Heritage and Archaeology | Chapter 11 377 It is the Policy of Dublin City Council: Visitors Centre and Magazine Fort), Collins Barracks, National Library of Ireland, the Casino at Marino, and The Custom House and the 1916 Moore Street National Monument.

Chapter 15 Development Standards

15.15 Built Heritage and Archaeology

Dublin City Centre and its suburbs comprise a number of significant historic and other buildings, streetscapes and spaces which contribute to the character and heritage of the city. There are also a number of areas that fall within zones of archaeological interest. It is essential that new development in these historic and distinct areas respects the existing character, safeguards the historic setting of the streets and spaces and addresses-built heritage and archaeology. In this regard, a series of development management standards are provided to guide new development in these areas and to ensure that our built heritage and archaeology are protected. The following section sets out the relevant guidelines and policies that apply to all new development and any extension or refurbishment in the historic areas or areas of significance in the city.

15.15.1 Archaeology

The definition of archaeological heritage includes structures, constructions, groups of buildings, developed sites, moveable objects, monuments of other kinds as well as their context, whether situated on land or under water, in accordance with the Valletta Convention, 1992. In order that the City Council's policy on archaeology is implemented, the following shall apply:

15.15.1.1 Preparing Planning Applications

Applicants shall have regard to Archaeology in the Planning Process (Office of the Planning Regulator, 2021) and Archaeology and Development Guidelines Good Practices for Developers (Heritage Council, 2000).

All applications for proposed new developments at sites marked as Sites and/or Zones of Archaeological Interest identified on the development plan zoning maps shall be subject to pre application discussion/consultation with the Archaeology Office.

Where a site is located within a Zone of Archaeological Interest, an Archaeological Assessment as defined in National policy and guidelines shall be prepared in consultation with the City Archaeologist and provided as part of the planning application. The assessment will evaluate the archaeological potential of the site for and the impact of the proposed development on them.

15.15.1.2 Exempted Development

Exempted development does not apply to any development that would consist of or comprise the alteration of any archaeological site, the preservation or protection of which is an objective of the relevant local authority development plan.

Where a development site is within a Zone of Archaeological Interest, is over 0.5 hectares in size, or for linear developments more than 1km in length, the applicant shall employ a suitably qualified archaeologist to carry out an archaeological assessment in consultation with the City Archaeologist at

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pre-planning stage and report on any necessary site investigation works prior to an application being lodged.

15.15.1.3 Best Practice

All archaeological reports submitted with a planning application and/or prepared in compliance with planning permission shall be produced in accordance with Excavation Reports Guidelines for Authors, (NMS, 2006).

All development shall be carried out in accordance with the Framework and Principles for the Protection of the Archaeological Heritage, 1999 and other National policy and guidelines for the archaeological heritage.

Archaeological work shall be carried out in accordance with current archaeological best practice policy and guidance published by the National Monuments Service, and with reference to technical guidelines issued by the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland. Where National technical best practice guidelines are unavailable, internationally recognised best practice guidance may apply.

Where archaeology services are incorporated into fixed priced contracts, the contract shall be prepared with regard to Standard and Guidance Procedures for Archaeological Services in Fixed Price Contracts used in the Republic of Ireland, (IAI, 2012).

Archaeological work shall be undertaken in accordance with the Policy and Guidelines on Archaeological Excavation, (NMS, 1999). All archaeological monitoring shall be done under licence.

Archaeological excavations shall comprise a specialist-led environmental site strategy and conducted in accordance with Environmental Sampling: Guidelines for Archaeologists, (IAI, 2007).

15.15.1.4 Basements

New basement development in the medieval core and known medieval sites shall be avoided. Approved basements may be rescinded where undue damage to in situ archaeological deposits will occur as a result.

15.15.1.5 Industrial Heritage

Archaeological assessments shall have regard to the Dublin City Industrial Heritage Record and evaluate any above and below ground industrial heritage features. Where industrial remains are identified, the application may be required to engage the services of an industrial heritage expert to prepare a specialist report.

15.15.1.6 Foundations

The impact and merits/demerits of foundation type and soil hydrology shall be archaeologically assessed to determine appropriate mitigation (including avoidance, redesign, etc.).

15.15.1.7 Archaeological Excavation

When planning permission for development involving sub-surface excavation is granted, the applicant's attention will be drawn to the legal obligation to report the discovery of archaeological finds to the National Museum of Ireland.

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15.15.1.8 Archaeological Mitigation

Where a site has tested positive for archaeology, in situ remains shall be evaluated for preservation in situ. In situ medieval structures shall be carefully evaluated with the aim of preservation and presentation in situ within the new development.

Where preservation in situ is not feasible, sites of archaeological and/or industrial heritage interest shall be subject to a full archaeological excavation and post excavation analysis according to best practice in advance of redevelopment.

Where an excavation is the agreed mitigation strategy the licenced archaeological director shall submit bi-weekly briefing notes to the City Archaeologist for the full duration of the excavation. A preliminary excavation report in digital and hard copy shall be submitted to the planning authority for the attention of the City Archaeologist within four weeks of the completion of the excavation or of each phase of the excavation and a detailed final report submitted within twelve months of the completion of the excavation.

The results of all archaeological excavations shall be evaluated for publication either as a monograph or scholarly article, within 1 year after archaeological site completion. Information about medieval sites will be disseminated to the public through the Friends of Medieval Dublin or similar free event within 1 year of site completion.

The excavation archive shall be prepared in accordance with Dublin City Archaeological Archive (DCC, 2008) and submitted to the Dublin City Archaeological Archive within 1 year of excavation completion.

15.15.1.9 Preservation In Situ

Where a proposed development is at a known Monument / Site or within an Archaeological Zone, discussions about the retention of features within / below developments (preservation in situ) and mitigation options shall take place at the outset of project planning and shall be reviewed at each stage of the project.

Before considering whether an archaeological site can be appropriately retained within a development (preserved in situ), the following shall be addressed:

1. The current state of preservation of the archaeological finds and deposits and how they contribute to the site's significance.
2. The likely development and how these will affect the site's significance.
3. For sites containing waterlogged archaeological remains, the availability and quality of water on the site and how sensitive this hydrological regime is to changes.

Preservation assessments shall form a discrete part of desk-based assessments and site evaluation reports. Consideration shall be given to the impact of any development proposal on waterlogged deposits that could be potentially threatened through changes to the hydrological regime, water levels and quality.

Test excavations shall be carried out to investigate and evaluate the deposits and the artefacts they contain in sufficient detail to establish their significance, their state of preservation and their susceptibility to adverse impact from proposed development.

Preservation assessments (including characterisation of the environmental conditions of the deposits) to form a regular part of the evaluation methodology for sites where retention within the development is likely to be the final mitigation outcome.

When the state of preservation of material is poor, and further burial following development is likely to cause additional damage to that material, excavation of the archaeological remains to recover their

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remaining significance and evidential value is the most appropriate strategy.

Where sites contain waterlogged archaeological remains, water environment studies to determine water availability and water stresses may be required.

If the condition of surviving material and deposits is good and development risks are not going to cause a change to below ground environments (including site hydrology), then harm to significance may be limited. In these instances, the retention of the site and its future management as part of the development may be achievable. For such sites, monitoring will not normally be necessary.

Where there is concern about potential impacts of development on well preserved archaeological remains, it is good practice for monitoring to only be considered appropriate if a mitigation scheme is in place to manipulate water levels or provide access for future excavation if environmental conditions deteriorate.

15.15.1.10 Piling and Archaeology

Where piling is being considered as part of a foundation design on a site containing archaeological remains, a range of site-specific information will be needed to enable sound decision taking with regard to the particular technical issues raised by the use of piled foundations.

- The applicant shall provide sufficient information demonstrating an adequate understanding of the significance of the archaeological site and assessment of potential harm to that significance arising from the development.
- The planning application shall include an appropriate desk-based assessment and where necessary the site will be evaluated by way of archaeological testing in advance of the grant of permission.
- Sufficient geotechnical site investigation shall be undertaken in accordance with Eurocode 7, early in the design process to ensure that appropriate engineering information is available to allow for a flexible foundation design and reduce the impact on archaeological remains.
- The developer shall consider foundation options and inform the piling contractors that archaeological remains are present on site before they tender.

Technical aspects associated with piled foundations will be appropriately assessed. These include but are not necessarily limited to:

1. The potential for the particular pile type utilised to damage archaeological deposits.
2. The cumulative impact of successive piling on a site resulting in damage to so much of a site that future re-examination would not be worthwhile.
3. The potential for piling to change the site hydrology, draining waterlogged deposits.

15.15.1.11 Recording of Historic Buildings

Buildings on the first edition OS that are not protected structures shall be recorded as part of the archaeological assessment that accompanies the planning application. Appropriate specifications for the recording of historic buildings will be determined in consultation with the City Archaeologist. Records of historic buildings will inform decisions relating to the approval or implementation of a scheme of development as part of the planning process or to document buildings, or parts of buildings, which will be lost as a result of demolition or alteration.

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15.15.2 Built Heritage

15.15.2.1 Architectural Conservation Areas

There are currently 24 Architectural Conservation Areas (ACA's) within the city as identified in Chapter 11 and as indicated as a green hatch on the zoning maps. Development in these zones must respect the existing character of the area and protect and enhance the setting and appearance of the streetscape and / or protected features. Details on the requirements for development within ACA's are set out in Policy BHA7 and BHA8 as set out in Chapter 11 as well as in the specific Framework for each ACA accessed in the link below: <https://www.dublincity.ie/residential/planning/archaeology-conservation-heritage/conservation-built-environment/architectural-conservation-areas>.

Many Architectural Conservation Areas (ACA's) contain significant groupings of protected structures, streetscapes and views and vistas of significance as well as buildings that individually may be of local significance, but collectively would have a greater significance as a group.

Larger scale applications within or immediately adjacent to an ACA will need to provide an assessment, carried out by a suitably qualified conservation professional, of the impact of the development on the ACA the streetscape and the buildings in the immediate vicinity and demonstrate that there will be no material, adverse impact arising. Such an assessment should be accompanied by appropriate drawings, imagery and photomontages of the site and the surrounding context to assist the planning authority in assessing the impacts of the development.

15.15.2.2 Conservation Areas

Conservation Areas include Z8 (Georgian Conservation Area) and Z2 (Residential Conservation Area) zones, as well as areas identified in a red hatching on the zoning maps which form part of the development plan. These red-hatch areas do not have a specific statutory protection but contain areas of extensive groupings of buildings, streetscapes, features such as rivers and canals and associated open spaces of historic merit which all add to the special historic character of the city.

All planning applications for development in Conservation Areas shall:

- Respect the existing setting and character of the surrounding area.
- Be cognisant and/ or complementary to the existing scale, building height and massing of the surrounding context.
- Protect the amenities of the surrounding properties and spaces.
- Provide for an assessment of the visual impact of the development in the surrounding context.
- Ensure materials and finishes are in keeping with the existing built environment.
- Positively contribute to the existing streetscape Retain historic trees also as these all add to the special character of an ACA, where they exist.

15.15.2.3 Protected Structures

There are almost 8,500 protected structures in the city, as identified on the Record of Protected Structures, Volume 4 of the plan. The inclusion of a structure in the Record of Protected Structures does not prevent a change of use of the structure, and/or development of, and/or extension to the structure, provided that the impact of any proposed development does not adversely affect the character of the Protected Structure and its setting. Conservation is the careful and sensitive management of change and DCC would support new proposals to conserve, repair and adapt Protected Structures to ensure they stay in long term sustainable use.

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Any works which materially affect the character of a Protected Structure require planning permission. Some works may be considered exempted development where they do not materially affect the character of the building or those elements of the structure that contribute to its special interest.

A Section 57 Declaration may be requested from the Planning Authority in relation to the type of works that it considers would or would not materially affect the character of the structure or of any element of special interest of the structure. Separately, a Section 5 Declaration can be sought from the Planning Authority to establish if specific works (such as repairs and other modest works) proposed would be considered exempted development (i.e. would not materially affect the character of the structure or any element of special interest of the structure).

A Protected Structure, unless otherwise stated, includes the interior of the structure, the land lying within the curtilage of the structure, any other structures (and their interiors) lying within that curtilage. The protection also extends to any features specified as being within the attendant grounds including boundary treatments.

Works to a protected structure should be carried out in accordance with the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Conservation Advice Series published by the Department of Housing, Local Government and Heritage

All planning applications for development/works to Protected Structures must provide the appropriate level of documentation, including an Architectural Heritage Impact Assessment, in accordance with Article 23 (2) of the Planning and Development Regulations, 2001 (as amended) and chapter 6 and appendix B of the 'Architectural Heritage Protection Guidelines for Planning Authorities' (2011), to assist in the assessment of proposals.

This report should be prepared by an accredited conservation architect or equivalent conservation professional/expert (a useful list of suitably qualified professionals is available on the Irish Georgian Society <https://www.igs.ie/> and RIAI <https://www.riai.ie/> websites). The report should:

- Outline the significance of the building(s) or structure(s) and their settings and an assessment of how the proposed works would impact on that significance.
- Include a detailed drawn survey of the building/structure identifying all surviving original/early and later features that may contribute to its significance and associated photographic survey.
- Include a conservation focused method statement and specification of works.
- Details of proposed works should be clearly identified on the accompanying survey drawings by way of colour coding and/or annotated notes to distinguish clearly between the existing structure, the proposed works including demolition of existing fabric and/or features. The colour coding should also show the provenance of the historic building, including identification of the various stages of its development, identifying original, historic and later intervention.

The detail required to be submitted will be dependent on the significance of the building and the nature and extent of works proposed. It may be of benefit to discuss specific requirements, with an Architectural Conservation Officer, prior to making a planning application; through the pre-planning consultation process.

15.15.2.4 Retention and Re-use of Older Buildings of Significance which are not Protected

Our built heritage is rich and varied. Much of our built heritage is not protected nor located within an ACA. The re-use of buildings/structures of significance is a central element in the conservation of the

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built heritage of the city and important to the achievement of sustainability.

In assessing applications to demolish buildings/structures of significance that are not protected, the planning authority will actively seek the retention and re-use of buildings and other structures of architectural, historical, archaeological, artistic, cultural, scientific, technical, social and/or local interest or those that make a positive contribution to the character and identity of streetscapes and the sustainable development of the city; also having regard to Policies BHA 05: Demolition of Regional Rated Buildings on NIAH and BHA 06: Buildings on Historic Maps. Where the planning authority accepts the principle of demolition, a detailed written and photographic inventory of the building may be required for record purposes.

15.15.2.5 Historic Buildings and Access

In assessing planning applications which relate to protected structures, regard shall be had to the protected status of the structure and the need to protect its special character. Detailed advice is provided in the Architectural Heritage Protection Guidelines for Planning Authorities (re-issued by DAHG, 2011) and in Access – Improving the Accessibility of Historic Buildings and Places (Advice Series, DAHG, 2011). There is a need for flexibility in the use of protected structures and in making them accessible to people with disabilities, whilst respecting their architectural integrity.

15.15.2.6 Barrier Free Access and Protected Structures

The creation of barrier free access to protected structures can be difficult to reconcile. Where access devices are proposed, the following information should be submitted:

- An assessment of the building's access requirements, including details on the circulation and user requirements of the building.
- An assessment of the impact of access devices on the special character and setting of the protected structure, particularly where architectural details such as plinths, thresholds, steps, staircases and railings, which contribute to the special interest of the building, are involved.
- An assessment of alternative design options considered to ensure the proposal would represent the most sensitive access solution available.
- Details of the materials and specifications of both permanent and temporary devices which should be appropriate to the location so as to reduce the visual impact of the mechanism.

Creative architectural responses which represent the most sensitive access solution will be actively encouraged. Proposals should be so designed to ensure the device can be removed without damage to the fabric of the building, where possible i.e. reversible. In certain cases, it may be necessary to locate such devices on/in less significant parts of the building. All works should retain the maximum amount of historic fabric in situ and should be designed to cause minimum interference to the historic building fabric and reduce the visual impact of the mechanism.

15.15.2.7 Fire Safety Works and Protected Structures

Fire protection works to protected structures relate directly to the use and requirements of a building and can have a significant impact on the character of a protected structure and require planning permission, if they give rise to significant impacts and/or alter the character of the protected structure. When considering proposals for fire safety measures, a strategic approach to fire protection works to the building will be encouraged. Uses which may diminish the special interest of a protected structure through inappropriate alterations will generally not be encouraged. Applications for fire protection

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works shall be guided by the principles of minimum intervention to the historic fabric and the reversibility of alterations, where achievable.

15.15.2.8 Lighting of Protected Structures and Buildings in Conservation Areas

Well-designed exterior lighting of landmark buildings, structures and spaces can play an important role in defining the character of the built heritage. A successful lighting scheme will relate to the architectural form of the building and will sensitively utilise the detailing and features of such buildings with low wattage and/or dimmable light sources in an appropriate colour, and discreet light fixtures. It will also minimise the spillage of potential obtrusive light to adjacent areas and will avoid unnecessary over lighting, which can alter the appearance of a building or area.

In considering applications for lighting schemes, the need for such schemes should be clearly established. Proposals for lighting schemes should include details of the size, type, siting, and number of fixtures and fixing methods, as well as wattage, colour of light source, light pattern and potential impact on the building material and features, and include visualisations to demonstrate the intended effects.

To avoid conflict, proposals should demonstrate how lighting schemes would enhance and protect the character of an area or group of protected structures and/ or co-ordinate with any adjacent lighting schemes. Powerful wide-angled over-lighting which can diminish the architectural features of a building, its setting or surrounding area will be discouraged. Lighting schemes may not be appropriate in certain residential areas, as the spillage of light from lighting schemes can impact on the amenities of such areas.

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Appendix 4 Terms and definitions used

The following sets out the definitions of the terms which are used throughout the report:

- (i) The phrase ‘cultural heritage’ is a generic term used in reference to a multitude of cultural, archaeological and architectural sites and monuments. The term ‘cultural heritage’, in compliance with Section 2(1) of the Heritage Act (1995), is used throughout this report in relation to archaeological objects, features, monuments and landscapes as well as all structures and buildings which are considered to be of historical, archaeological, artistic, engineering, scientific, social or technical interest.

For the purpose of this assessment, each identified cultural heritage site is assigned a unique cultural heritage number with the prefix ‘CH’.

- (ii) A feature recorded in the ‘Record of Monuments and Places’ (RMP) refers to a recorded archaeological site that is granted statutory protection under the National Monuments Act 1930-2004. When reference is made to the distance between an RMP and the proposed development site (see below), this relates to the minimal distance separating the site from the known edge of the RMP. Where the edge of the RMP is not precisely known, the distance relates to that which separates the site from the boundary of the RMP zone of archaeological potential as represented on the respective RMP map; where this is applied, it is stated accordingly.
- (iii) An ‘area of archaeological potential’ refers to an area of ground that is deemed to constitute one where archaeological sites, features or objects may be present in consequence of location, association with identified/recorded archaeological sites and/or identifiable characteristics.
- (iv) The term ‘proposed development site’ refers to the defined area of land within which the proposed development, including access tracks etc, may be constructed.
- (v) In relation to the term ‘study area’ please see Section 1.3 above.
- (vi) The term ‘receiving environment’ refers to the broader landscape within which the study area is situated. Examination of the site’s receiving environment allows the study area to be analysed in its wider cultural context.
- (vii) The terms ‘baseline environment’ and ‘cultural heritage resource’ refer to the existing, identifiable environment against which potential impacts of the proposed scheme may be measured.

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Appendix 5 Glossary and definition of archaeological terms

Barracks A building or group of buildings used to house members of the police or armed forces. These date from the late 17th century AD onwards.

Brewery A commercial complex of buildings for the brewing of beer. These date from the 19th century AD onwards.

Bridge A structure of wood, stone, iron, brick or concrete, etc., built to span a river or ravine in order to facilitate the crossing of pedestrians or vehicles. These date from the medieval period (5th - 12th centuries AD) onwards.

Burial ground An area of ground, set apart for the burial of the dead, not associated with a church. These date from the medieval period (5th - 16th centuries AD) onwards. See also Children's burial ground and Graveyard.

Castle (unclassified) A castle that cannot be more precisely classified. They can date from the late 12th to the 16th century AD. See also Castle - Anglo-Norman masonry castle; Castle - hall-house; Castle - motte; Castle - motte and bailey; Castle - ringwork; Castle - ringwork and bailey; Castle - tower house.

Chapel A free-standing building which is used for private worship. These date from the late medieval period (c. 1400 to the 16th century AD) onwards.

Church A building used for public Christian worship. These can be of any date from c. 500 AD onwards.

Corn store A large building used for the storage of grain. These date to the 18th and 19th centuries AD.

Country house The rural residence of the landed gentry. These houses date from the late 17th century to the first half of the 19th century AD.

Courthouse A building in which a judicial court is held. These date from the 16th century AD onwards.

Culvert A culvert is a structure that allows water to flow under a road, railroad, trail, or similar obstruction. Typically embedded so as to be surrounded by soil, a culvert may be made from a pipe, reinforced concrete or other material

Drydock A narrow basin or vessel that can be flooded to allow a load to be floated in, then drained to allow that load to come to rest on a dry platform. Dry docks are used for the construction, maintenance, and repair of ships, boats, and other watercraft.

Enclosure An area defined by an enclosing element (e.g., bank, wall, fosse, scarp), or indicated as such cartographically, and occurring in a variety of shapes and sizes, possessing no diagnostic features which would allow classification within another monument category. These may date to any period from prehistory onwards.

Fulacht fiadh Prehistoric site potentially used for a variety of purposes such as cooking, brewing, bathing, textile dying etc. Characterised by a crescentic mound of burnt stone; usually located in damp areas, where the trench (trough) for cooking would fill with water; usually found in groups (plural: *fulachta fiadh*).

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Graveyard The burial area around a church. These date from the medieval period (5th-16th centuries) onwards.

Headstone An upright stone placed over the head of a grave. These date from 17th century AD onwards.

Hermitage A secluded place, either a man-made structure or a natural feature, such as a cave, where a hermit lived. These date from the medieval period (5th-16th centuries AD).

Historic town A settlement of pre-AD 1700 date that occupied a central position in the communications network, functioned as a market centre and had an organised layout of streets with a significant density of houses and associated land plots. In addition, examples of one of the following monument classes should be present: town defences; castle/tower house; house (which functioned as a manor house); parish church/cathedral; religious house(s); administrative institution (e.g., town hall, market-house); judicial institution (e.g., courthouse, prison); monuments indicating specialised technological production (e.g., mill, kiln, tannery, ironworking site); bridge; hospital; school; quays. Where only documentary evidence survives to suggest a town was present then the term 'Historic town possible' applies.

Holy well A natural spring or well associated with a saint or a tradition of cures.

Hospital A building for the care of the sick, aged, infirm and poor. These date from the medieval period (5th-16th centuries AD) onwards.

House (18th/19th century) A building for human habitation which dates to the 18th/19th century, and which is not classifiable as either a country house or a vernacular house.

House (20th century) A building for human habitation which dates to the 20th century, and which is not classifiable as either a country house or a vernacular house.

Library A building, room or suite of rooms where books, or other materials, are classified by subject and stored for use by the library's members. These date from the 17th century AD onwards.

Market-house A market building incorporating other function rooms, e.g., theatres, courtrooms, schoolrooms. In Ireland market-houses are sometimes colloquially referred to as tholsels. These date from the later medieval period (12th-16th centuries AD) onwards.

Mass-rock A rock or earthfast boulder used as an altar or a stone-built altar used when Mass was being celebrated during Penal times (1690s to 1750s AD), though there are some examples which appear to have been used during the Cromwellian Period (1650s AD). Some of these rocks/boulders may bear an inscribed cross. See also Penal Mass station.

Milling complex A series of post-1700 AD structures associated with milling, including any of the following: mill, millpond, millrace, engine house, industrial chimney, administrative buildings and workers' factory.

Mill (unclassified) A mill, including where present the millrace and millpond, where corn is ground or where raw material is processed. This classification is used, in the context of this database, when it

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is unclear whether the mill in question is a water mill or a windmill. These may date from the late medieval period (c. 1400 to the 16th century AD) onwards.

Millrace The current of water that turns a water wheel, or the channel (sluice) conducting water to or from a water wheel.

Pier/jetty A structure, extending out into the water, built of iron, wood or stone, for docking or accessing ships or boats. They may also serve to protect a harbour, influence the current or tide and are sometimes used as promenades. These may date to any period from prehistory onwards.

Prison An establishment where offenders are confined. These date from the late medieval period (c. 1400 to the 16th century AD) onwards.

Quay A stone or timber landing-place built parallel to, or projecting out from, the shoreline, to serve in the loading and unloading of vessels. These date from the Iron Age (c. 500 BC - AD 400) onwards.

Redundant record Records classed as 'Redundant record' are those that fulfil one or more of the following criteria: (1) a record identifying a location where, according to documentary sources (e.g., published reference, cartographic sources) or personal communication, a monument might have existed, but which, on inspection, was found not to be an archaeological monument (e.g. a natural feature); (2) a record classified using a term which is now obsolete (e.g. ecclesiastical remains); (3) a record created in error, a duplicate record or one which has no supporting evidence recorded on file or in the database; (4) an archaeological object (i.e. an artefact), e.g. a quernstone; (5) a record entered as a 'Shipwreck'. Shipwrecks are recorded in a separate database.

Ringfort Early medieval Christian (c. 500 AD to 1100) defended secular settlement consisting of a bank and external ditch defining a central circular area that contained dwelling structures of occupants; also called fairy fort, rath, lios, or cashel (the latter constructed of stone as opposed to earth).

School An establishment in which people, usually children, are taught. These date from the late medieval period (c. 1400 to the 16th century AD) onwards.

Shambles Structure/structures where animals were slaughtered and/or where meat and fish were sold. These date from the medieval period (5th-16th centuries AD) onwards.

Souterrain An underground structure consisting of one or more chambers connected by narrow passages or creepways, usually constructed of drystone-walling with a lintelled roof over the passages and a corbelled roof over the chambers. Most souterrains appear to have been built in the early medieval period by ringfort inhabitants (c. 500 - 1000 AD) as a defensive feature and/or for storage.

Standing Stone A stone which has been deliberately set upright in the ground, usually orientated on a north-east-south-west axis, although other orientations do occur, and varying in height from 0.5m up to 6m. They functioned as prehistoric burial markers, commemorative monuments, indicators of routeways or boundaries and date from the Bronze and Iron Ages (c. 2400 BC - AD 500), with some associated with early medieval ecclesiastical and burial contexts (c. 5th-12th centuries).

Tomb (chest tomb) A free standing, box-like funerary monument. These date from the 13th century AD onwards. Examples that are incorporated in a wall are classified as Wall monument. Examples with an effigy are classified as Tomb – effigial.

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Town hall A large building used for the transaction of the public business of a historic town (pre-1700 AD), the holding of courts of justice, entertainments and other activities. In Ireland, town halls are sometimes colloquially referred to as tholsels.

Weir – regulating A dam constructed on the reaches of a canal or navigable river designed to retain the water and to regulate its flow. These date from the late medieval period (c. 1400 to the 16th century AD) onwards.