

**ARCHAEOLOGICAL ASSESSMENT
AT
CRUMLIN ROAD / RAFTER'S LANE,
CRUMLIN, DUBLIN 12**

ON BEHALF OF: DUBLIN CITY COUNCIL

ITM: 712340, 732077

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ABSTRACT

This assessment has been prepared on behalf of Dublin City Council to study the impact, if any, on the archaeological and historical resource of a proposed development at the junction of Crumlin Road and Rafter's Lane, Crumlin, Dublin 12 (Figure 1; ITM 712340, 732077). It was carried out by John Gallacher of IAC Archaeology.

There are no recorded monuments situated within 250m of the proposed development area; the nearest of which is the site of a windmill (DU018-039) located c. 340m to the south. Structures of built heritage include the former house, latterly *Ardscoil Éanna* (NIAH Ref. 50080190), situated to the immediate east, and the site of a smithy c. 225m to the southwest (DCHIR). No previous archaeological investigations have been conducted within the study area, and no stray artefacts have been recorded from the surrounding townlands.

A review of the historic mapping indicated that the proposed development area was situated within open fields to the south of the road leading to Crumlin. A realignment of the Crumlin Road was laid out in the early 20th century, and the now Rafter's Lane fossilises the former roadway. A house and outbuildings shown on the site in the 19th century are no longer upstanding, and two modern abandoned buildings are now present. No previously unknown features of archaeological potential were identified from the aerial photography and satellite imagery, or during the field inspection.

No archaeological remains have been identified by this assessment within the proposed development area. The site was likely situated in agricultural land bordering the medieval manor of Crumlin. While the site has been subject to construction and demolition in the 19th and 20th centuries it is possible that archaeological deposits may be present, which possess no surface expression. Ground disturbances associated with the proposed development, such as excavation to formation level, have the potential to impact on any such remains that may survive beneath the current ground level.

It is recommended that all ground disturbances associated with the proposed development be monitored by a suitably qualified archaeologist. If any features of archaeological potential are discovered during the course of the works further archaeological mitigation may be required, such as preservation in-situ or by record. Any further mitigation will require approval from the National Monuments Service of the DoHGLH and the Dublin City Archaeologist.

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1 INTRODUCTION

1.1 GENERAL

The following report details an archaeological assessment undertaken in advance of a proposed development at Crumlin Road, Crumlin, Dublin 12 (Figure 1; ITM: 712340, 732077). This assessment has been carried out to ascertain the potential impact of the proposed development on the archaeological and historical resource that may exist within the area. It was undertaken by John Gallacher of IAC Archaeology (IAC), on behalf of Dublin City Council.

The archaeological assessment involved a detailed study of the archaeological and historical background of the proposed development site and the surrounding area. This included information from the Record of Monuments and Places of County Dublin, the topographical files within the National Museum and all available cartographic and documentary sources for the area. A field inspection has also been carried out with the aim to identify any previously unrecorded features of archaeological or historical interest.

1.2 THE DEVELOPMENT

The proposal is for 38 no. apartments, all with private amenity space, arranged in four interconnected blocks around a communal courtyard garden. These new homes will be for social housing and will be managed by Dublin City Council.

The blocks are all 3-storeys high with the block fronting the Crumlin Road at 4-storeys high. Bike parking, bin store, plant rooms and substation are also provided at ground floor level. Demolition works on the site are the subject of another application and the site will be cleared prior to construction works.

2 METHODOLOGY

A study area, defined as 250m from the boundary of the proposed development area, was assessed to inform this report. Research was undertaken in two phases. The first phase comprised a paper survey of all available archaeological, historical and cartographic sources. The second phase involved a field inspection of the site.

2.1 PAPER SURVEY

- Record of Monuments and Places for County Dublin;
- Sites and Monuments Record for County Dublin;
- National Monuments in State Care Database;
- Preservation Orders List;
- Topographical files of the National Museum of Ireland;
- Cartographic and written sources relating to the study area;
- Dublin City Development Plan 2022-2028;
- Aerial photographs;
- Excavations Bulletin (1970–2025);
- Dublin City Industrial Heritage Record.

Record of Monuments and Places (RMP) is a list of archaeological sites known to the National Monuments Section, which are afforded legal protection under Section 12 of the 1994 National Monuments Act and are published as a record.

Sites and Monuments Record (SMR) holds documentary evidence and field inspections of all known archaeological sites and monuments. Some information is also held about archaeological sites and monuments whose precise location is not known e.g. only a site type and townland are recorded. These are known to the National Monuments Section as 'un-located sites' and cannot be afforded legal protection due to lack of locational information. As a result, these are omitted from the Record of Monuments and Places. SMR sites are also listed on a website maintained by the Department of Housing, Local Government and Heritage (DoHLGH) – www.archaeology.ie.

National Monuments in State Care Database is a list of all the National Monuments in State guardianship or ownership. Each is assigned a National Monument number whether in guardianship or ownership and has a brief description of the remains of each Monument.

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

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

The topographical files of the National Museum of Ireland are the national archive of all known finds recorded by the National Museum. This archive relates primarily to artefacts but also includes references to monuments and unique records of previous excavations. The find spots of artefacts are important sources of information on the discovery of sites of archaeological significance.

Cartographic sources are important in tracing land use development within the development area as well as providing important topographical information on areas of archaeological potential and the development of buildings. Cartographic analysis of all relevant maps has been made to identify any topographical anomalies or structures that no longer remain within the landscape.

Documentary sources were consulted to gain background information on the archaeological and cultural heritage landscape of the proposed development area.

Development Plans contain a catalogue of all the Protected Structures and archaeological sites within the county. The Dublin City Development Plan 2022-2028 (Chapters 11 and 15) was consulted to obtain information on cultural heritage sites in and within the immediate vicinity of the proposed development area.

Aerial photographic coverage is an important source of information regarding the precise location of sites and their extent. It also provides initial information on the terrain and its likely potential for archaeology. A number of sources were consulted including aerial photographs held by the Ordnance Survey and Google Earth.

Excavations Bulletin is a summary publication that has been produced every year since 1970. This summarises every archaeological excavation that has taken place in Ireland during that year up until 2010 and since 1987 has been edited by Isabel Bennett. This information is vital when examining the archaeological content of any area, which may not have been recorded under the SMR and RMP files. This information is also available online (www.excavations.ie) from 1970–2025.

The Dublin City Industrial Heritage Record (DCIHR) makes recommendations for sites to be added to the Record of Protected Structures (RPS) in the City Development Plan and is maintained by DCC. It is a policy of the Council to implement the recommendations of the DCIHR.

2.2 FIELD INSPECTION

Field inspection is necessary to determine the extent and nature of archaeological and historical remains and can also lead to the identification of previously unrecorded or suspected sites and portable finds through topographical observation and local information.

The archaeological field inspection entailed the following:

- Walking the proposed development and its immediate environs.
- Noting and recording the terrain type and land usage.
- Noting and recording the presence of features of archaeological or historical significance.
- Verifying the extent and condition of any recorded sites.
- Visually investigating any suspect landscape anomalies to determine the possibility of their being anthropogenic in origin.

3 RESULTS OF ARCHAEOLOGICAL ASSESSMENT

3.1 ARCHAEOLOGICAL AND HISTORICAL BACKGROUND

The proposed development area is located on Crumlin Road, in the townland of Crumlin, the parish of Crumlin and the barony of Uppercross, in Dublin 12 (Figure 1; ITM 712340, 732077). The site is bound by Rafter's Lane to the north, Rafter's Road to the west, Crumlin Road to the south, and by privately owned property to the east. The site is currently divided into three property plots. The southwest quadrant contains an abandoned cruciform building (former funeral home), while the northwest area is an overgrown green space. The eastern half of the site is covered in hard standing with a large rectangular building in the northeast.

There are no recorded monuments within the proposed development area, or surrounding study area. The nearest recorded monument is the site of a windmill (DU018-039) located c. 340m to the south. A cluster of medieval sites (DU018-038001-4) are situated c. 450m to the southwest, including a church and castle (motte) likely associated with the manor of Crumlin.

The now abandoned '*Ardcoil Éanna*' (NIAH Ref. 50080190) is situated to the immediate east of the proposed development area. It comprises a former house, built in c. 1880 which was repurposed as a school in 1939 by cultural nationalists James J. O'Byrne and Margaret Pearse, sister of Patrick Pearse. One industrial heritage site listed within the DCIHR is located within 250m of the proposed development area, comprising a smithy located c. 225m to the southwest.

3.1.1 Prehistoric Period

This period includes the Mesolithic (c. 8000-4000 BC), Neolithic (4000–2500 BC), Bronze Age (2500–800 BC) and Iron Age (800 BC–AD 500). There are few known monuments in the vicinity of the proposed development site that are ascribed to these periods. It is likely that the River Liffey and Dublin Bay were important elements in the landscape for the populations in the Neolithic and Mesolithic, as both a food and travelling resource. The proposed site is c. 1.1km southeast of the River Cormac, meaning that the proposed development area occupies land that may have contained desirable resources to prehistoric peoples. A stone axehead was found as a stray find, c. 1km east-southeast of the proposed development (NMI Ref. 1934:82).

3.1.2 Early Medieval Period (AD 500–1100)

The area now known as County Dublin straddled the ancient Kingdoms of Brega (north of the River Tolka) and Laigin (south of the Tolka). The medieval settlement at Dubh Linn is situated c. 3.5km to the northeast of the proposed development. The proposed development area was likely situated within open agricultural land at this time.

The current graveyard at St Mary's Church of Ireland Crumlin is sub-circular in plan and is considered to represent a pre-Norman ecclesiastical enclosure (DU018-038003), situated c. 585m southwest of the proposed development area. If this is the

case then the church foundation would have been associated with a wider settlement landscape which may have taken in the lands within the proposed development area.

3.1.3 Medieval Period (AD 1100–1600)

Following the Anglo-Norman invasion of Ireland in 1169, the medieval town of Dublin enjoyed a period of renewed prosperity and development, which continued until the beginning of the 14th century. The Anglo-Norman administration was responsible for reinforcing the town walls with defensive towers. Further improvements to the defences involved erecting a number of gates on the built-up streets outside the walls and supplementing the defensive gates already in place along the town wall itself (Halpin 2000, 34). At this time the area of proposed development would have been located within the manorial lands for Crumlin. The site of a now-lost possible motte castle (DU018-038004) are situated c. 510m southwest of the proposed development area.

In 1290, when Henry Compton was granted the demesne lands of the royal manor of Crumlin, he met with fierce opposition from the tenants of Crumlin who had previously held the farm of the manor (Foley 2013, 7). In 1331, a close letter reveals Saggart to have been an *'ancient ferm'* and a decade later Crumlin and Newcastle Lyons were described as being *'of the king's ancient demesne'* (ibid. 9). According to Foley (2013, 9) *'The classification of these manors as ancient demesne may indicate that they were part of the demesne lands of the Norse'*. Crumlin was one of just four manors in County Dublin annexed to the Crown and governed by a seneschal (Lewis 1837; Simms & Fagan 1992, 83)

In 1336, King Edward III granted to John Fitzwilliam Jordan, for his life, the manor of Crumlin, as an ancient royal demesne. In the same year he constituted Thomas Smithe Seneschal of the lordships of Newcastle of Lyons, Crumlin, and Saggard, for five years; and in the following year granted to the natives and tenants of Crumlin and their heirs 122a. of land, with the appurtenances in said manor, at the rent of £6 17s. 3d., provided they and their heirs, within ten years, and at their own expense, caused the town to be enclosed against the attacks of enemies (D'Alton 1838, 696).

The now disused St. Mary's Church of Ireland church (DU018-038001) was built 1817 and is situated 562m southwest of the proposed development area. It incorporates the western tower of a medieval church of the royal manor of Crumlin.

3.1.4 Post-Medieval Period (AD 1600–1950)

During this period Dublin city changed in plan, function, and composition. It moved from a decaying colonial outpost to a cosmopolitan *'city of the Empire'* (Boyd 2006). In 1538, the Dissolution of the Monasteries changed the ecclesiastical landscape of Dublin and many of the former monasteries were repurposed. In 1594, in the context of the Tudor conquest of Ireland and the Counter-Reformation, Crumlin was burned by Wicklow insurgents led by Gerald Fitzgerald (Lewis 1837). In 1610, Speed's map of Dublin largely depicted the last snapshot of the medieval city of Dublin, which more or less had occupied the same structural framework for the previous 600 years. In 1756, John Rocque's map captured a transformed city. This map shows the proposed development area to the north of a road leading southwest from the city to Crumlin

and beyond. A large house is situated in the vicinity, although the exact position of this in relation to the proposed development area is not certain. The settlement cluster at Crumlin is illustrated to the southwest.

At that time however, Crumlin remained a rural area on the southwestern outskirts of Dublin city. Taylor's map of 1816 shows the proposed development to the south of a curving section of roadway, bordered to the south by a newly laid straight Crumlin Road. A large building to the east is annotated as a 'Sail Factory'. By the early 1820s the straight Crumlin Road has replaced the former curved route. The scale of Duncans map does not allow for much detail, however notwithstanding this there are no buildings indicated within the proposed development area. In 1837, Lewis stated that the population of the parish of Crumlin was 958, of which 544 were in the village, which consisted of 115 houses. The first edition OS map shows two buildings fronting onto the Crumlin Road, which are partially within the southern boundary of the proposed development area. A rectangular building is situated at the rear of the yard for this property. The surrounding land comprises irregular-shaped tree-lined fields.

The Rafter's Lane had been re-established by the turn of the 20th century forming the northern boundary of the proposed development area. Further outbuildings have been built up to the rear of the house fronting onto Crumlin Road within the proposed development area. The house (NIAH 50080190) situated to the east of the proposed development area was built in c. 1880. As part of the Dublin Corporation's inner-city slum clearances, Crumlin began to be developed during the 1920s and especially during the 1930s (McManus 2002, 220-234). Of 6,019 houses built in Dublin from 1931-1939, over 50% were in Crumlin. Only with the substantial development of the mid-20th-century did the area become subsumed into the city.

3.2 SUMMARY OF PREVIOUS ARCHAEOLOGICAL FIELDWORK

A review of Excavations Bulletin (1970–2025) has revealed that no previous investigations have been carried out either within the site or the 250m study area.

3.3 CARTOGRAPHIC ANALYSIS

John Rocque, Map of County Dublin, 1760 (Figure 3)

This map depicts Crumlin as a rural and sparsely settled area not yet subsumed into Dublin city. Crumlin Road is shown to the south of 'The New Canal' (i.e. the Grand Canal), and as having been flanked by occasional side roads and scattered buildings, including two buildings south of the proposed development area annotated as 'Church' and 'The Chapple' (one of which is possibly DU018-038001).

John Taylor, Map of Dublin City and its Environs, 1816 (Figure 4)

A newly aligned linear road, 'Crumlin Road', has been laid out to the south of the proposed development area by this time. The proposed development area is located within an island of land framed by Crumlin Road to the south, and the former curved road network to the north. The site is largely clear of buildings, however a structure, situated to the east is annotated as a 'Sail Factory'.

William Duncan, Map of the County of Dublin, 1821 (Figure 5)

This map shows the old curving road as now defunct with the linear Crumlin Road now the primary access bordering the site to the south. There are no buildings shown within the proposed development area at this time, however the scale of the mapping may have limited what is shown.

First Edition Ordnance Survey Map, 1844, scale 1:10,056 (Figure 6)

This is the first map to show the proposed development area with any degree of accuracy. The proposed development area is shown within a semi-circular plot of land bordered to the south by the Crumlin Road. Two buildings are shown fronting onto the road within the southern boundary of the proposed development area, with a building at the rear of the plot. The curving line of the former road (now fossilised by Rafter's Lane) is indicated. The wider area comprises open tree-lined fields, traversed by Crumlin Road, and the settlement of Crumlin to the southwest.

Ordnance Survey Maps of the Terenure and Crumlin Estates, 1879, scale 1:2,500 (Figure 7)

This map shows every field, house and plot in greater detail. It lists house and cottage names, shows physical and man-made features and gives an indication of land use, showing trees and gardens. The extent of the estate, and tenants' and lessees' names are written in copper-plate handwriting in each holding. Land to the immediate east of the proposed development area is shown as having been held by Charles Graves. The owner of the entire area was Sir Robert Shaw, 1st Baronet. The houses shown on the first edition OS map are still present and a little garden and yard are associated.

Ordnance Survey Map, 1912, scale 1:2,500

By the time of this map, further buildings have been constructed to the rear of the house fronting onto Crumlin Road. The house situated to the front (NIAH 50080190) is illustrated for the first time.

Ordnance Survey Map, 1938, scale 1:2,500

This map no longer shows the east-west aligned structures in the northern perimeter of the proposed development area. A long rectangular building is located along the eastern boundary of the site. Rafter's Road has been laid out by this time but does not yet connect with Crumlin Road, with the lane traversing the southwest quadrant of site. The surrounding area has seen substantial development, with Crumlin now subsumed into Dublin city.

3.4 DEVELOPMENT PLAN

The Dublin City Development Plan 2022-2028 recognises the statutory protection afforded to all Record of Monuments and Places (RMP) sites under the National Monuments Legislation (1930–2014). The plan lists a number of policies in relation to archaeological heritage (Appendix 2). There are no recorded monuments located within the proposed development area or within the 250m study area. The nearest recorded monument is the site of a windmill (DU018-039), located c. 340m south of the proposed development area.

3.5 TOPOGRAPHICAL FILES OF THE NATIONAL MUSEUM OF IRELAND

Information on artefact finds from the study area in County Dublin has been recorded by the National Museum of Ireland since the late 18th century. Location information relating to these finds is important in establishing prehistoric and historic activity in the study area. The two closest recorded stray finds are: a holy water stoup (NMI Ref. 1941:24), found c. 590m southwest of the proposed development; and a stone axe-head, which was found, c. 1km east-southeast of the proposed development (NMI Ref. 1934:82).

3.6 DUBLIN CITY INDUSTRIAL HERITAGE RECORD

A review of this record has shown that one feature is included within the DCIHR within c. 250m of the proposed development area. This is a smithy located c. 225m southwest. While shown on historical Ordnance Survey mapping, no upstanding remains were observed during the DCIHR survey.

3.7 AERIAL PHOTOGRAPHIC ANALYSIS

Inspection of the aerial photographic coverage of the proposed development area held by the Ordnance Survey (1995–2013), Google Earth (2003–2025) and Bing Maps (2021) was undertaken as part of the assessment. The most recent imagery shows the site as containing a cruciform building in the southwest, an overgrown green space with some trees in the northwest, and a north–south plot containing a large rectangular building in the east. It is clear from the imagery that none of the historic buildings illustrated on the Ordnance Survey mapping, has survived upstanding.

No previously unknown features of archaeological potential were identified from the aerial photography and satellite imagery.

3.8 FIELD INSPECTION

The field inspection sought to assess the site, its previous and current land use, the topography, and any additional information relevant to the report. The site was visited in dry bright conditions on Thursday 17th May 2025.

The area of proposed development comprises three parcels of land, bordered to the south by Crumlin Road, west by Rafter's Road and north by Rafter's Lane. The eastern half of the site comprises a rectangular north-south aligned plot, largely covered by hard standing and tarmac surface. A large rectangular structure, dating to the latter half of the 20th century is upstanding along the northeast perimeter (Plate 1). This portion of the site is bordered by high concrete boundary walls, bolstered to the north by buttresses (Plate 2).

A modern red-brick cruciform building in the southwest corner of the proposed development comprises a former funeral home. The building is abandoned and the grounds are overgrown (Plate 3). The northwest corner of the proposed development is a heavily overgrown green space, bordered to the north and west by a high stone wall (Plate 4).

No evidence for any previously unrecorded archaeological or built heritage remains were evident within the proposed development area. The now abandoned remains of a house (NIAH 50080190), which latterly functioned as Ardcoil Éanna is situated to the east.

4 CONCLUSIONS

This assessment has been prepared on behalf of Dublin City Council to study the impact, if any, on the archaeological and historical resource of the proposed development at Crumlin Road / Rafter's Lane, Dublin 12 (Figure 1; ITM 712340, 732077). It was carried out by John Gallacher of IAC Archaeology.

There are no recorded monuments within 250m of the proposed development area. The nearest recorded monument is the site of a windmill (DU018-039), located c. 340m south of the proposed development area. The site is not inside the zone of potential associated with the historic town of Dublin (DU018-020). One industrial site listed within the DCIHR is located within 250m of the proposed development area. This is a smithy located c. 225m southwest. The site is immediately adjacent to a NIAH-listed building. Namely, *Ardscoil Éanna*, 314 Crumlin Road (NIAH Ref. 50080190).

A review of the Excavations Bulletin (1970–2025) has shown that no previous archaeological fieldwork has been carried out within the area of development. A review of the aerial photographic coverage did not identify any previously unrecorded sites of archaeological potential within the development area.

A review of the historic mapping coverage has shown that the Crumlin Road was laid out in the early 19th century, with a former sail factory located to the east at this time. A house and outbuildings were present within the proposed development area, built in the early to mid-19th century, of which none are currently upstanding. No previously unknown features of archaeological potential were identified from the aerial photography and satellite imagery.

There are no stray finds recorded in the Topographical Files of the National Museum of Ireland from within the proposed development area or its immediate environs. No previously unrecorded areas of archaeological potential were noted during the course of the field inspection.

5 IMPACT ASSESSMENT AND MITIGATION STRATEGY

Impacts can be identified from detailed information about a project, the nature of the area affected and the range of archaeological resources potentially affected. Archaeological sites can be affected adversely in a number of ways: disturbance by excavation, topsoil stripping; disturbance by vehicles working in unsuitable conditions; and burial of sites, limiting access for future archaeological investigation. Upstanding archaeology can be affected adversely by direct damage or destruction arising from development, from inadvertent damage arising from vibration, undermining etc. and also by indirect impacts to a building's visual setting, view or curtilage.

5.1 IMPACT ASSESSMENT

- No archaeological remains have been identified by this assessment within the proposed development area. The site was likely situated in agricultural land bordering the medieval manor of Crumlin. While the site has been subject to construction and demolition in the 19th and 20th centuries it is possible that archaeological deposits may be present, which possess no surface expression. Ground disturbances associated with the proposed development, such as excavation to formation level, have the potential to impact on any such remains that may survive beneath the current ground level.

5.2 MITIGATION

- It is recommended that all ground disturbances associated with the proposed development be monitored by a suitably qualified archaeologist. If any features of archaeological potential are discovered during the course of the works further archaeological mitigation may be required, such as preservation *in-situ* or by record. Any further mitigation will require approval from the National Monuments Service of the DoHLGH and the Dublin City Archaeologist.

It is the developer's responsibility to ensure full provision is made available for the resolution of any archaeological remains, both on site and during the post excavation process, should that be deemed the appropriate manner in which to proceed.

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

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CARTOGRAPHIC SOURCES

John Rocque, *Map of County Dublin*, 1760

John Taylor, *Map of Dublin City and its Environs*, 1816

William Duncan, *Map of the County of Dublin*, 1821

Ordnance Survey Maps, 1844, 1879, 1912, 1938

ELECTRONIC SOURCES

www.excavations.ie – Summary of archaeological excavation from 1970–2025.

www.archaeology.ie – DoH/HLGH website listing all SMR/RMP sites.

www.heritagemaps.ie – The Heritage Council web-based spatial data viewer which focuses on the built, cultural and natural heritage.

www.geohive.ie – Ordnance Survey Ireland National Townland and Historical Map Viewer (including Aerial imagery 1995, 2000, 2005 and 2013)

<https://www.arcgis.com/apps/webappviewer/index.html?id=e0c5595b033341dea7661e248d2e9ee9> – South Dublin Historical Mapping

www.duchas.ie - National Folklore Collection, UCD. The Schools' Collection. 1937-1939.

www.googleearth.com – Satellite imagery (2005–2023).

www.apple.com/maps/ - Satellite imagery (2023).

APPENDICES

APPENDIX 1 LEGISLATION PROTECTING THE ARCHAEOLOGICAL RESOURCE

PROTECTION OF CULTURAL HERITAGE

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

THE ARCHAEOLOGICAL RESOURCE

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

OWNERSHIP AND GUARDIANSHIP OF NATIONAL MONUMENTS

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

REGISTER OF HISTORIC MONUMENTS

Section 5 of the 1987 Act requires the Minister to establish and maintain a Register of Historic Monuments. Historic monuments and archaeological areas present on the register are afforded statutory protection under the 1987 Act. Any interference with sites recorded on the register is illegal without the permission of the Minister. Two months' notice in writing is required prior to any work being undertaken on or in the vicinity of a registered monument. The register also includes sites under Preservation Orders and Temporary Preservation Orders. All registered monuments are included in the Record of Monuments and Places.

PRESERVATION ORDERS AND TEMPORARY PRESERVATION ORDERS

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

RECORD OF MONUMENTS AND PLACES

Section 12(1) of the 1994 Act requires the Minister for Arts, Heritage, Gaeltacht and the Islands (now the Minister for the Department of Housing, Local Government and Heritage) to establish and maintain a record of monuments and places where the Minister believes that such monuments exist. The record comprises a list of monuments and relevant places and a map/s showing each monument and relevant place in respect of each county in the state. All sites recorded on the Record of Monuments and Places receive statutory protection under the National Monuments Act 1994. All recorded monuments on the proposed development site are represented on the accompanying maps.

Section 12(3) of the 1994 Act provides that 'where the owner or occupier (other than the Minister for Arts, Heritage, Gaeltacht and the Islands) of a monument or place included in the Record, or any other person, proposes to carry out, or to cause or permit the carrying out of, any work at or in relation to such a monument or place, he or she shall give notice in writing to the Minister of Arts, Heritage, Gaeltacht and the Islands to carry out work and shall not, except in case of urgent necessity and with the consent of the Minister, commence the work until two months after giving of notice'.

Under the National Monuments (Amendment) Act 2004, anyone who demolishes or in any way interferes with a recorded site is liable to a fine not exceeding €3,000 or imprisonment for up to 6 months. On summary conviction and on conviction of indictment, a fine not exceeding €10,000 or imprisonment for up to 5 years is the penalty. In addition, they are liable for costs for the repair of the damage caused.

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

THE PLANNING AND DEVELOPMENT ACT 2000

Under planning legislation, each local authority is obliged to draw up a Development Plan setting out their aims and policies with regard to the growth of the area over a five-year period. They cover a range of issues including archaeology and built

heritage, setting out their policies and objectives with regard to the protection and enhancement of both. These policies can vary from county to county. The Planning and Development Act 2000 recognises that proper planning and sustainable development includes the protection of the archaeological heritage. Conditions relating to archaeology may be attached to individual planning permissions.

Dublin City Development Plan 2022–2028

It is the Policy of Dublin City Council:

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.
8. To have regard to national policy documents and guidelines relating to archaeology and to best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland.

APPENDIX 2 IMPACT ASSESSMENT AND THE CULTURAL HERITAGE RESOURCE

POTENTIAL IMPACTS ON ARCHAEOLOGICAL AND HISTORICAL REMAINS

Impacts are defined as 'the degree of change in an environment resulting from a development' (Environmental Protection Agency 2022). They are described as profound, significant or slight impacts on archaeological remains. They may be negative, positive or neutral, direct, indirect or cumulative, temporary or permanent.

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

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

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

PREDICTED IMPACTS

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

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

APPENDIX 3 MITIGATION MEASURES AND THE CULTURAL HERITAGE RESOURCE

POTENTIAL MITIGATION STRATEGIES FOR CULTURAL HERITAGE REMAINS

Mitigation is defined as features of the design or other measures of the proposed development that can be adopted to avoid, prevent, reduce or offset negative effects.

The best opportunities for avoiding damage to archaeological remains or intrusion on their setting and amenity arise when the site options for the development are being considered. Damage to the archaeological resource immediately adjacent to developments may be prevented by the selection of appropriate construction methods. Reducing adverse effects can be achieved by good design, for example by screening historic buildings or upstanding archaeological monuments or by burying archaeological sites undisturbed rather than destroying them. Offsetting adverse effects is probably best illustrated by the full investigation and recording of archaeological sites that cannot be preserved *in situ*.

DEFINITION OF MITIGATION STRATEGIES

ARCHAEOLOGICAL RESOURCE

The ideal mitigation for all archaeological sites is preservation *in situ*. This is not always a practical solution, however. Therefore, a series of recommendations are offered to provide ameliorative measures where avoidance and preservation *in situ* are not possible.

Archaeological Test Trenching can be defined as 'a limited programme of intrusive fieldwork which determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts within a specified area or site on land, inter-tidal zone or underwater. If such archaeological remains are present field evaluation defines their character, extent, quality and preservation, and enables an assessment of their worth in a local, regional, national or international context as appropriate' (ClfA 2020a).

Full Archaeological Excavation can be defined as 'a programme of controlled, intrusive fieldwork with defined research objectives which examines, records and interprets archaeological deposits, features and structures and, as appropriate, retrieves artefacts, ecofacts and other remains within a specified area or site on land, inter-tidal zone or underwater. The records made and objects gathered during fieldwork are studied and the results of that study published in detail appropriate to the project design' (ClfA 2020b).

Archaeological Monitoring can be defined as 'a formal programme of observation and investigation conducted during any operation carried out for non-archaeological reasons. This will be within a specified area or site on land, inter-tidal zone or underwater, where there is a possibility that archaeological deposits may be

disturbed or destroyed. The programme will result in the preparation of a report and ordered archive (ClfA 2020c).

Underwater Archaeological Assessment consists of a programme of works carried out by a specialist underwater archaeologist, which can involve wade surveys, metal detection surveys and the excavation of test pits within the sea or riverbed. These assessments are able to access and assess the potential of an underwater environment to a much higher degree than terrestrial based assessments.



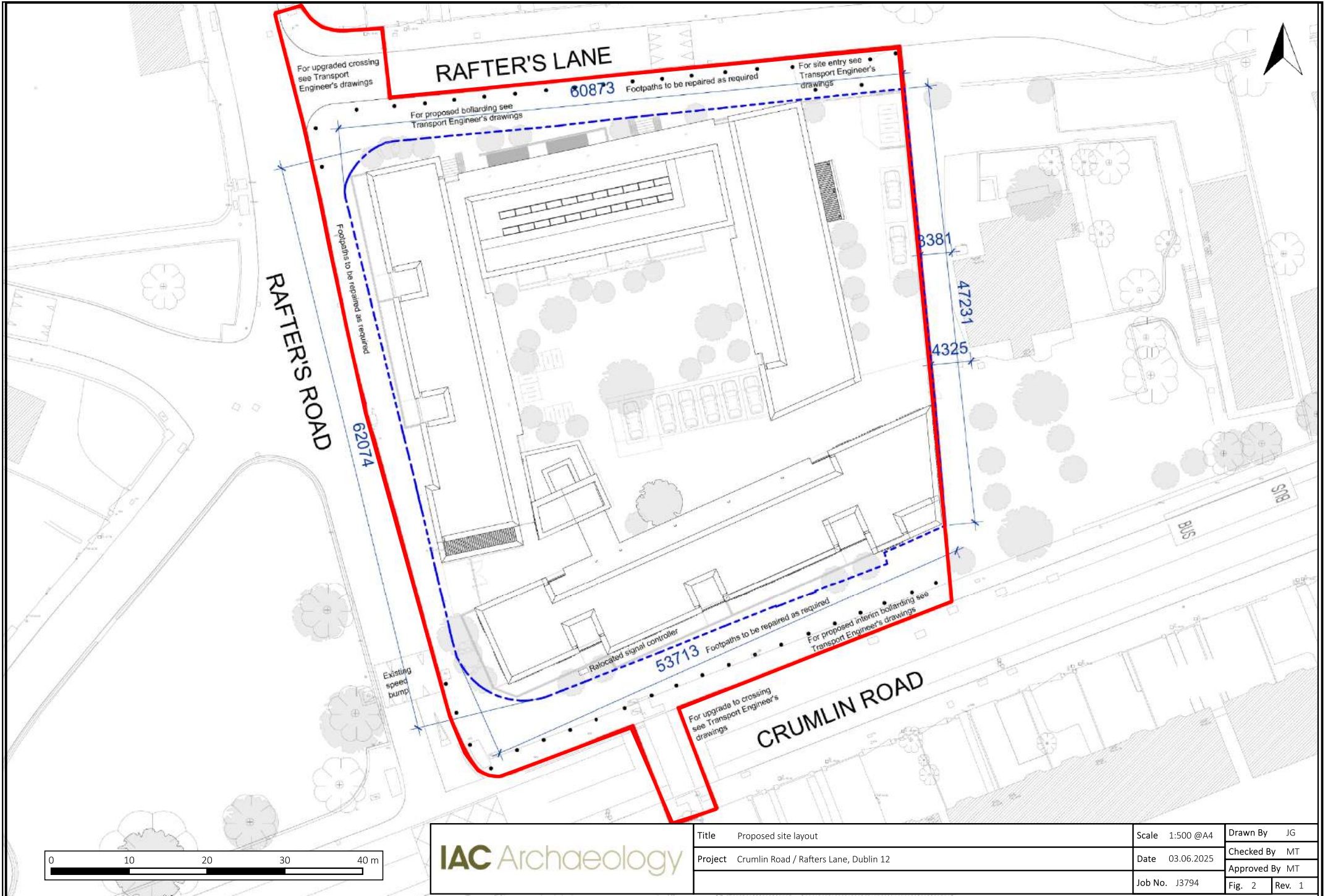
Legend

- Site Boundary
- SMR sites
- NIAH



IAC Archaeology

Title	Site location showing nearby sites of archaeology and built heritage significance	Scale	1:1,000 @A4	Drawn By	JG
Project	Crumlin Road / Rafter's Lane, Dublin 12	Date	03.06.2025	Checked By	MT
		Job No.	J3794	Approved By	MT
				Fig. 1	Rev. 1



RAFTER'S LANE

RAFTER'S ROAD

CRUMLIN ROAD

For upgraded crossing see Transport Engineer's drawings

For proposed bollarding see Transport Engineer's drawings

For site entry see Transport Engineer's drawings

Footpaths to be repaired as required

60873 Footpaths to be repaired as required

62074

9381

47231

4325

Relocated signal controller

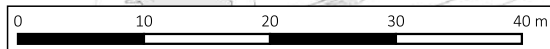
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Footpaths to be repaired as required

For proposed interim bollarding see Transport Engineer's drawings

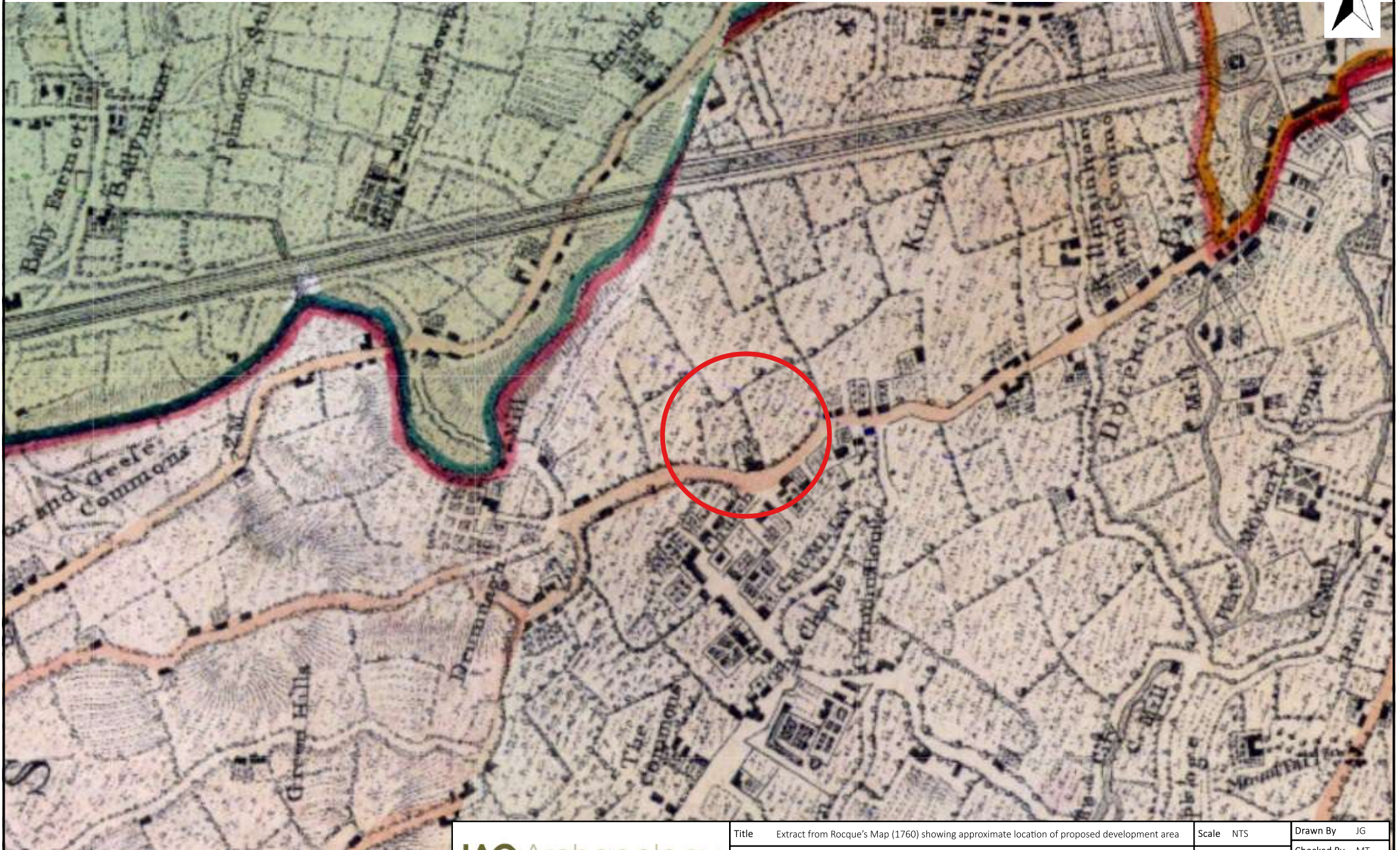
For upgrade to crossing see Transport Engineer's drawings

Existing speed bump



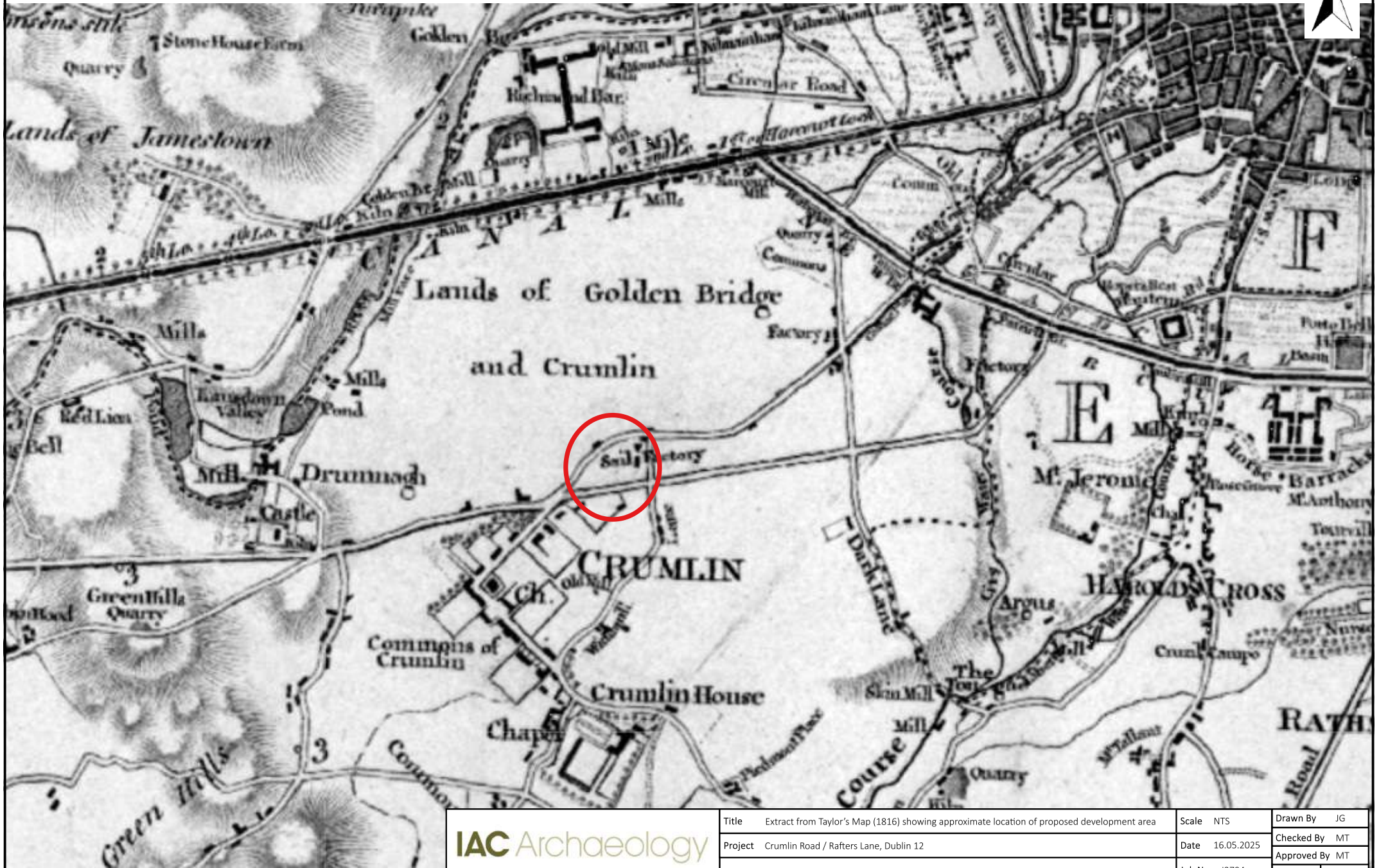
IAC Archaeology

Title	Proposed site layout	Scale	1:500 @A4	Drawn By	JG
Project	Crumlin Road / Rafter's Lane, Dublin 12	Date	03.06.2025	Checked By	MT
		Job No.	J3794	Approved By	MT
				Fig. 2	Rev. 1



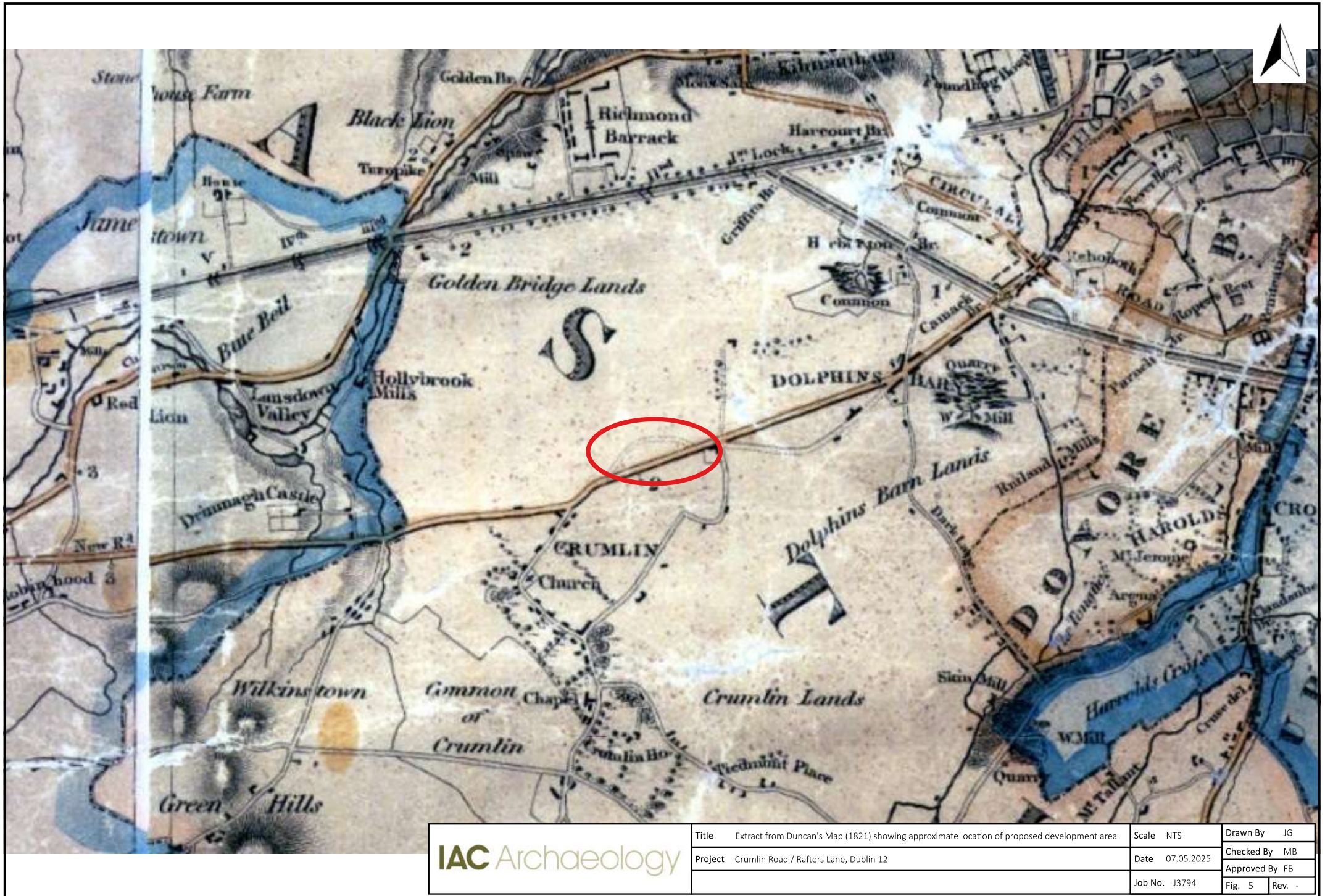
IAC Archaeology

Title	Extract from Rocque's Map (1760) showing approximate location of proposed development area	Scale	NTS	Drawn By	JG
Project	Crumlin Road / Rafters Lane, Dublin 12	Date	16.05.2025	Checked By	MT
		Job No.	J3794	Approved By	MT
				Fig. 3	Rev. -



IAC Archaeology

Title	Extract from Taylor's Map (1816) showing approximate location of proposed development area	Scale	NTS	Drawn By	JG
Project	Crumlin Road / Rafters Lane, Dublin 12	Date	16.05.2025	Checked By	MT
				Approved By	MT
		Job No.	J3794	Fig.	4
				Rev.	-



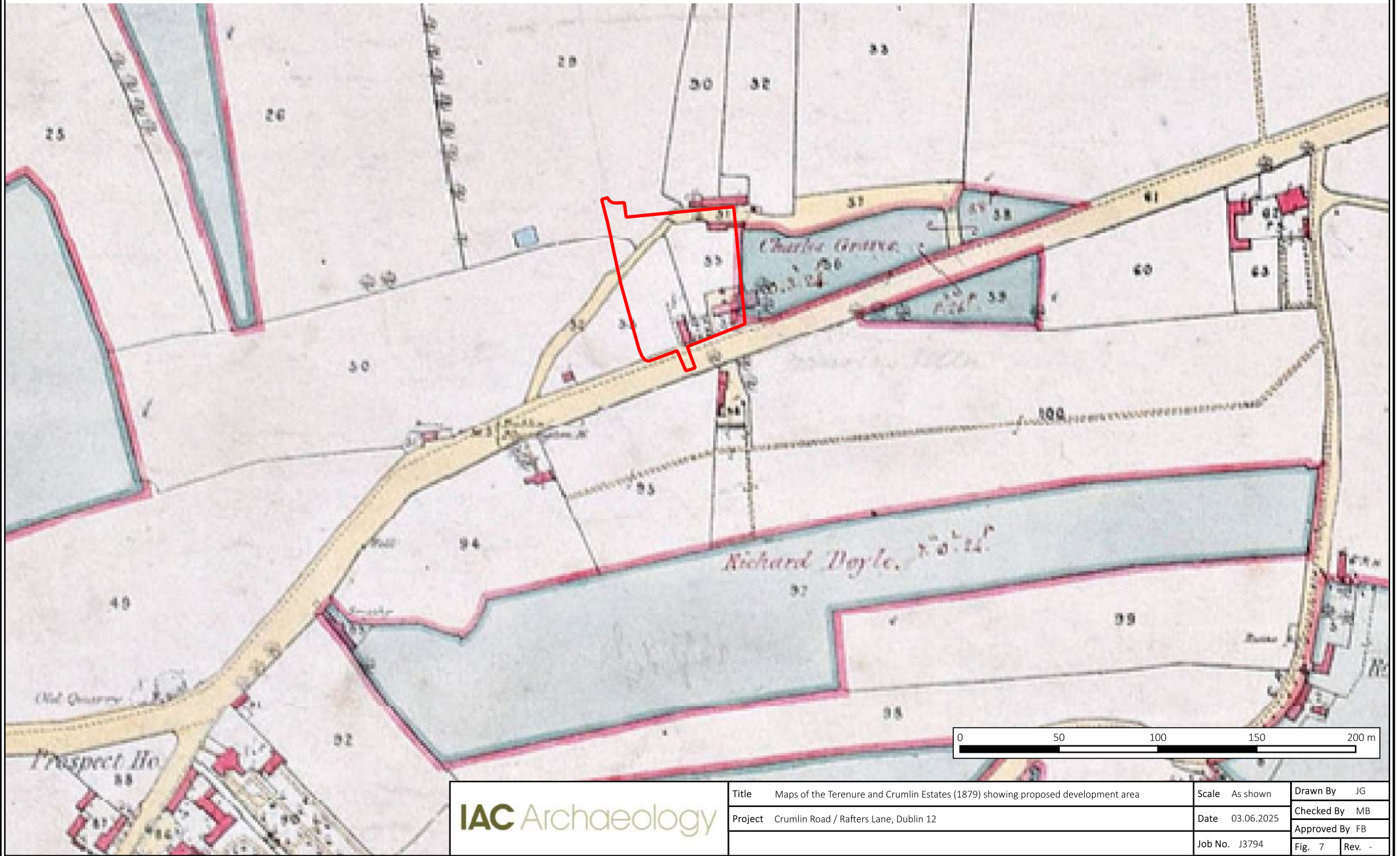
IAC Archaeology

Title	Extract from Duncan's Map (1821) showing approximate location of proposed development area	Scale	NTS	Drawn By	JG
Project	Crumlin Road / Rafters Lane, Dublin 12	Date	07.05.2025	Checked By	MB
				Approved By	FB
		Job No.	J3794	Fig.	5
				Rev.	-



IAC Archaeology

Title	First Edition Ordnance Survey map (1843) showing proposed development area	Scale	As shown	Drawn By	JG
Project	Crumlin Road / Rafters Lane, Dublin 12	Date	16.05.2025	Checked By	MB
				Approved By	FB
		Job No.	J3794	Fig. 6	Rev. 1



IAC Archaeology

Title	Maps of the Terenure and Crumlin Estates (1879) showing proposed development area	Scale	As shown	Drawn By	JG
Project	Crumlin Road / Rafters Lane, Dublin 12	Date	03.06.2025	Checked By	MB
				Approved By	FB
		Job No.	J3794	Fig.	7
				Rev.	-



Plate 1: Eastern part of proposed development area, facing north



Plate 2: Northern boundary wall, facing east



Plate 3: Former funeral home on Crumlin Road/Rafter's Road, facing northeast



Plate 4: Northern boundary wall for overgrown area in northwest, facing west