

**ARCHAEOLOGICAL ASSESSMENT
AT
BLUEBELL ROAD,
BLUEBELL,
DUBLIN 12**

ON BEHALF OF: THE LAND DEVELOPMENT AGENCY

ITM: 710706, 732638

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ABSTRACT

This assessment has been prepared on behalf of the Land Development Agency, to study the impact, if any, on the archaeological and historical resource of the proposed residential development at Bluebell Road, Bluebell, Dublin 12 (Figure 1; ITM 710706, 732638). It was carried out by Faith Bailey of IAC Archaeology, in accordance with the *Framework and Principles for the Protection of the Archaeological Heritage* (1999). Architectural heritage is addressed in a separate report produced by Hanna Loughnane, of Five-Seven Architects.

The site is located to the immediate south of the Grand Canal between Bluebell Road and Bluebell Avenue. There are three recorded monuments within 250m of the proposed development area: a church (DU018-033001) and graveyard (DU018-033002) located c. 100m to the southwest, and a bridge (DU018-034), located c. 198m to the south.

There are two sites listed in the DCIHR, which are recorded within the proposed development area. These consist of four 19th century stone-built filter beds associated with the Dublin Corporation Water Works and the site of a Lock Cottage, adjacent to the 5th Lock on the Grand Canal.

The assessment confirmed that the original four filter beds remain present in the landscape, albeit in a denuded condition and heavily overgrown. A masonry wall, contemporary with the construction of the filter beds, bounds the proposed development area to the north. More recent filter beds to the south and southwest of the original features, are also present within the site.

The assessment also confirmed the eastern portion of the proposed development area is occupied by existing housing. The southern portion of the site was formerly developed but is now in use as allotments. The central portion of the site remains as greenfield but has been subject to ground disturbance and localised dumping.

Filter Bed 1 will not be affected by the proposed development, although it is located within the wayleave of future Luas development and may be impacted by future works associated with that development.

Filter Beds 2 and 3 (Plate 1) will be partially retained as sunken gardens. The masonry walls are to be left in their current position with localised repairs where necessary. The southern and western edges of the filter beds will be impacted by the construction of Block 1 of the proposed development. This will necessitate the removal of the filter bed walls down to formation level, but any existing stonework or features below formation level will remain in-situ.

It is not possible to retain Filter Bed 4 as a sunken garden due to requirements for access and Health and Safety concerns. As such, the eastern section will be removed prior to construction and it is proposed to mark the outline of the filter bed with

modern paving within the landscaping associated with the development. The western section will be impacted by the construction of Block 2 of the proposed development. This will necessitate the removal of the filter bed walls down to formation level, but any existing stonework or features below formation level will remain in-situ.

It is proposed to retain and adapt sections of the northern boundary wall to the development area. As laid out in the architectural heritage assessment (pg 27), sections will be retained in-situ, but other sections will require rebuilding in order to ensure structural integrity. The rebuilt sections of the wall will be refaced with stone from the original wall. The existing and relatively recent cement capping on the wall will be removed in order to promote permeability and passive surveillance of the public spaces.

There will be an overall negative impact on the filter beds given they will be either covered by the proposed development or repurposed into a garden landscape. The negative effect is partially ameliorated by the incorporation of the filter beds into the development, which is a positive impact in terms of highlighting the industrial heritage of the site in the development area.

Sections of the boundary wall will be incorporated into the development, albeit some sections require reconstruction due to structural stability. The retention of sections of the wall is a positive impact in terms of incorporating industrial heritage into the proposed development.

Prior to the commencement of construction, all vegetation within the 19th century filter beds (No. 1-4) will be removed in order to allow for a full measured survey and plan of the features to be made. This will also include the removal of soils that have accumulated since the decommissioning of the beds. The survey will include the northern boundary wall. The measured survey will be accompanied by a written record and include, as appropriate, sections and elevations of the filter beds. The survey will be carried out by a built/industrial heritage specialist with appropriate survey support.

Following the measured survey, appropriate recommendations will be made by a Conservation specialist regarding repairs that are required for the walls to be retained as part of the development.

The removal of the walls associated with the development of Blocks 1 and 2 and the public space (Filter Beds 2/3/4) will be conducted as an archaeological exercise in the first instance, in order to record the construction of the beds and any other features that may be present. This will be carried out with the relevant support in order to remove any Health and Safety risks associated with working at depths (within the filter beds). The removal of the walls will be subject to careful archaeological monitoring.

Following the completion of investigation and recording of the industrial heritage features on site, proposals for interpretive heritage panels will be agreed with the Dublin City Archaeologist, which will be erected within the publicly accessible portions of the site.

No impacts are predicted upon the archaeological resource within the eastern or southern portion of the development area, due to the level of modern development that has taken place in these areas. This earlier development would have resulted in the removal of any archaeological features that may have been present. No archaeological mitigation is required for this part of the proposed development.

The central 'greenfield' portion of the development area has been subject to ground disturbance associated with the existing filter bed complex and subsequent dumping. Although the overall archaeological potential of this area is low, it remains possible that ground disturbances associated with the proposed development has the potential to directly impact on previously unrecorded archaeological remains that may be located beneath the current ground level. Prior to construction commencing, a programme of archaeological testing will be carried out across the accessible portions of the site. This will be carried out under licence to the National Monuments Service of the DoHLGH. 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.

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1 INTRODUCTION

1.1 GENERAL

The following report details an archaeological assessment undertaken in advance of a proposed residential development at Bluebell Road, Bluebell, Dublin 12 (Figure 1; ITM 710706, 732638). 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 Faith Bailey of IAC Archaeology (IAC), on behalf of the Land Development Agency and in accordance with the *Framework and Principles for the Protection of the Archaeological Heritage* (1999).

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.

The architectural heritage is assessed within a separate report, produced by RIAI Grade 1 Conservation Architect Hanna Loughnane, of Five-Seven Architects and will be cross referenced, where applicable, during the course of this assessment.

1.2 THE DEVELOPMENT

The proposed development includes for demolition of existing above ground structures on site, including the existing maisonettes and the existing community facility known as the Bungalow (which is being relocated within the site), and the construction of a residential development set out in 5 no. blocks, ranging in height from 5 to 9 storeys to accommodate 383 no. apartments, 3 no. community/cultural units and a crèche (Figure 2).

The primary site access is via a new entrance from Bluebell Road at the junction with La Touche Drive which includes for a new pedestrian crossing, with secondary access for pedestrians and cyclists only, from Bluebell Avenue. Car parking is provided at both below podium level and at surface level with secure bicycle parking for residents, visitors and cargo bikes provided throughout the scheme. Access is provided through the scheme onto the Grand Canal for pedestrians and cyclists.

The development also includes for a centrally landscaped public realm and an area of linear open space along the western corridor of the site which includes a play area, biodiversity planting, relocated allotments and provides access and permeability to the Grand Canal. The proposed application includes all site landscaping works, green roofs, boundary treatments, lighting, servicing, signage, and associated and ancillary works, including site development works above and below ground.

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); and
- 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 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 National Inventory of Architectural Heritage is a state initiative established under the provisions of the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999 tasked with making a nationwide record of significant local, regional, national and international structures, which in turn

provides county councils with a guide as to what structures to list within the Record of Protected Structures.

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.

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 -

- 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 in the townland of Bluebell, Parish of Drimnagh, Barony of Uppercross, Dublin 12. The site is situated to the immediate south of the Grand Canal, between Bluebell Road and Bluebell Avenue, and historically contained filter beds associated with the Dublin Corporation Waterworks, which are included in the Dublin City Industrial Heritage Record (DCIHR). The filter beds were built in 1868 by Parke Neville, Dublin's city surveyor, in association with the Fifth Lock Works, intended to supply water to industries in the city (Corcoran 2006).

The architectural heritage within the site, including the filter beds and the boundary wall separating the proposed development area are addressed in detail within a separate report prepared as part of the planning application (Loughnane, 2025). The relevant cross references to that report are made during the course of this assessment.

There are three recorded monuments within 250m of the proposed development area including a church and graveyard (DU018-033001-02), located c. 100m to the southwest, and a bridge (DU018-034), recorded c. 198m to the south (Figure 1). The Zone of Archaeological Potential for the historic core of Dublin City (DU018-020) is located c. 1.5km to the northeast of the proposed development area.

No previous archaeological fieldwork has been carried out within the proposed development area. Pre-development testing and monitoring (Bennett 2017:211, Licence No. 17E0449) at Bluebell Lodge, in proximity to the church and graveyard (DU018-033001-02), failed to reveal anything of archaeological significance.

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). Scattered evidence of activity dating to these periods has been recorded within Dublin City as a whole, but no prehistoric sites have been recorded within the immediate landscape surrounding the proposed development area.

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 name Dublin (*Duiblinn*) – meaning black pool – is generally taken to refer to the tidal pool that was located at the confluence of the Poddle and Liffey directly southeast of the site of the present Dublin Castle. This pool gave its name to an early ecclesiastical foundation the first secure reference to which dates to AD 790 when the Annals of Ulster state that ‘Siadal, abbot of the church of Duiblinn died,’ (Duffy 2014).

The Vikings had established themselves in Dublin by the middle of the 9th century and by the 10th century, Dublin had become a recognised urban centre. One of the first Viking landing points was marked by a standing stone or pillar stone (‘The Long Stone’),

which was erected according to Norse custom (De Courcy 1996, 235). The Long Stone (DU018-020129) stood just above the high-tide shoreline at the confluence of the Liffey and the Steine on the southern side of the River Liffey. Today this is thought to be on the northern side of Trinity College.

There are no recorded early medieval sites within the study area of the proposed development.

3.1.3 Medieval Period (AD 1100–1600)

The beginning of the medieval period is characterised by political unrest that originated from the death of Brian Borumha in 1014. Diarmait MacMurchadha, deposed King of Leinster, sought the support of mercenaries from England, Wales and Flanders to assist him in his challenge for kingship. Norman involvement in Ireland began in 1169 when Richard de Clare and his followers landed in Wexford to support MacMurchadha. Two years later de Clare (colloquially known as Strongbow) inherited the Kingdom of Leinster and by the end of the 12th century, the Normans had succeeded in conquering much of the country (Stout and Stout 1997, 53). The initial stage of the invasion of the country was marked by the construction of motte and bailey castles.

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). During the medieval period, the area of the proposed development was located a significant distance from the city walls and only gradually became part of the western suburbs of Dublin in later centuries.

The proposed development area is situated c. 795m northwest of the Anglo-Norman, Drimnagh Castle (DU018-036), today located on the grounds of the Christian Brother's monastery. This castle was associated with the Barnewall family from the 13th to the early 17th century (Ball 1906). Limited excavations in 1992 and 1993 (Bennett 1992:038; 1993:048, Licence No. 92E0114) at the northwest of the castle within the area enclosed by a moat revealed a stone-filled pit, which contained 13th-15th century pottery and a drilled roof slate.

The Book of Reference to the Down Survey (c. 1655) mentions the ruins of an old chapel (DU018-033001) c. 166m southwest of the development area within a graveyard (DU018-033002), which is enclosed by a stone wall c. 128m to the southwest. According to Ball (1906, 133) the church was in use in 1547. Today the west gable is the most prominent feature of the church.

3.1.4 Post-Medieval Period (AD 1600–1800)

During the 18th century, the Grand and Royal Canals, which connected Dublin to the River Shannon in the west of Ireland, were excavated. The construction of the canals was essential for the provision of water, the transportation of goods and industry in

Dublin and its environs. Textile Manufacturing, brewing, distilling and tanning were some of the dominant industries in Dublin City during the 18th and 19th centuries, although others such as lime burning, brick-making and flour milling were also important (Goodbody 2014, 6). A paper mill (DU018-035) at Drimnagh c. 736m southeast of the development area occupies the site of an earlier mill shown on the Down Survey (c. 1655). An associated millrace runs off the Cammock River at this location.

The Grand Canal lies to the immediate north of the proposed development area, which is also the location of the 5th Lock built in c. 1775. This specific lock is noted as one of the earlier locks built in Dublin City, as the canal originally terminated at the City Basin off James's Street, and the circular line was only completed in the 1790s (www.buildingsofireland.ie). A towing path, running along the south and north sides of the canal was built between 1763 and 1779.

According to the first edition Ordnance Survey map (Figure 4) the development area contained one structure, a lock house listed on the DCIHR, associated with the 5th Lock of the Grand Canal. This structure would later be incorporated into filter beds associated with the Dublin Corporation Waterworks as depicted on the 1910 Ordnance Survey map (Figure 5), which is also included in the DCIHR. Corcoran (2006) describes them as 'filter beds built in 1868 by Parke Neville, Dublin's city surveyor, and known as the Fifth Lock Works. Works were intended to supply water to industries in the city and were located at 147ft above datum. Now comprise three/four tanks with random rubble walls and granite kerb stones' (as cited in the DCIHR). Although they were recorded as being constructed in 1868, they are not shown on the 1871 Ordnance Survey map.

A total of four filter beds were constructed originally, as shown on the 1910 OS map (Plate 1, filter beds 1-4). Later works involved the construction of three modern beds (filter beds 5-7).

The wider area received greater transport options in the 19th century with the construction of the Great Southern and Western Railway, c. 628m to the north of the development area, which was built and running by 1846. It became the Great Southern Railway in 1924 when it amalgamated with the Midland and Great Western Railway.

3.2 SUMMARY OF PREVIOUS ARCHAEOLOGICAL FIELDWORK

A review of the Excavations Bulletin (1970–2024) has revealed that no previous archaeological fieldwork has been carried out within the proposed development area. One archaeological investigation has taken place in the vicinity of the site.

Pre-development testing at Bluebell Lodge, c. 165m southwest of the development area, in proximity to the church and graveyard (DU018-033001-02) failed to reveal anything of archaeological significance (Bennett 2017:211, Licence No. 17E0449). Subsequent archaeological monitoring of groundworks associated with the same development also failed to identify anything of archaeological significance.

3.3 CARTOGRAPHIC ANALYSIS

William Petty, Down Survey Map of the Barony of Newcastle and Parish of Clandalkin, c. 1655

While no details relating to the specific site of the proposed development area are visible, the parish map provides more detail of the surrounding area than is often found on the survey maps. The proposed development area is depicted to the northeast of the annotated church (DU018-033001) within the arable lands of Drimnagh. The River Cammock is marked and labelled, crossed by a bridge (DU018-034) that leads to Drimnagh Castle (DU018-036). The site of a mill (DU018-035) is also noted on the south banks of the Cammock.

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

By the time of Rocque's Map of 1760, the development area is shown to the south of the 'New Canal' within possibly two fields. Bluebell Avenue defines the southwestern road that connects with Naas Road to the east. In the wider area the site of 'James Town' is found just to the north of the canal, while the settlement at 'Drumhagh' and the site of the mill is depicted to the south.

John Taylor, Map of the Environs of Dublin, 1816

by the time this map, the development area is to the south of the depicted '5th Lock' within open land with the Grand Canal now being tree-lined denoting the canal's towing path. A number of mills are now annotated in proximity to the River Cammock with a mill pond shown to the south within the Landsdown Valley. Lands to the north of the canal are annotated as 'Lands of Jamestown'.

William Duncan's Map of the County of Dublin, 1821

There were no notable changes within the proposed development area by the time this map was produced. The open lands containing the development area are now named 'Blue Bell'. Jamestown House is now annotated to the north, while Hollybrook Mills are marked to the southeast.

First Edition Ordnance Survey Map, 1843, scale 1:10,560 (Figure 4)

This is the first accurate historic mapping coverage of the area containing the proposed development area, which is within parts of three fields within the townland of Bluebell. One structure, a lock house listed on the DCIHR, associated with the 5th Lock is noted within the northern extent of the site. At this location, the map also marks the position of a heel stone sill. The Grand Canal, as noted in the previous mapping, is shown with a tree-lined towing path. In the wider area, the site of a woollen mill is annotated to the southwest along Bluebell Avenue. The church (DU018-033001) and enclosed graveyard (DU018-033002) are depicted to the southwest.

Second Edition Ordnance Survey Map, 1871, scale 1:10,056

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

Ordnance Survey Map, 1910, scale 1:2,500 (Figure 5)

By the time of this map, the proposed development area remains largely undeveloped; however, the filter beds associated with the Dublin Corporation Waterworks have been constructed immediately south of the 5th Lock and within the northern part of the proposed development area. A number of drainage features, or a small watercourse, are shown extending east, west and southeast from the filter beds, which are depicted as a group of four rectangular structures. The small structure shown on the earlier mapping remains extant at this time, located within the tow path of the Grand Canal and the filter beds to the immediate south. This is likely to be the cottage associated with the 5th Lock. In the wider area the woollen mill to the southwest is now in disuse and houses with back gardens are depicted to the immediate west of the development area.

Third Edition Ordnance Survey Map, 1944, scale 1:10,560

By the time of this map the filter beds remain extant, along with the small structure adjacent to the 5th Lock. A sub-square area of raised ground is shown within the development area to the southwest of the filter beds. The purpose of the raised area is unclear, but it may represent an additional filtration area. Two small structures are marked adjacent to this, one of which is 'The Bungalow' currently in use as a community facility. A watercourse/ drainage channel is shown to the southeast of the filter beds.

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 aims and objectives in relation to archaeological heritage (Appendix 2). The proposed development area is not located within a recorded monument but does contain a DCIHR and as such the below policy is relevant:

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.

Section 15.15, pg. 629, Chapter 15 (Development Standards) includes the following:

- 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.

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

The northern boundary wall to the proposed development area separates the Grand Canal from the site and incorporates the remains of a return wall, which surrounded the former Lock Cottage, which is marked on the first edition OS map of 1843 and later editions.

There are three recorded monuments within 250m of the proposed development area; a church (DU018-033001) and graveyard (DU018-033002) located c. 100m to the southwest and a bridge (DU018-034), located c. 198m to the south (Table 1; Figure 1; Appendix 1).

TABLE 1: Recorded archaeological sites in proximity to the study area

RMP NO.	LOCATION	CLASSIFICATION	DISTANCE TO SITE
DU018-033001	Bluebell	Church	c. 100m southwest
DU018-033002	Bluebell	Graveyard	c. 100m southwest
DU018-034	Bluebell / Drimnagh	Bridge	c. 198m south

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. No stray finds have been retrieved from the vicinity of the proposed development area.

3.6 DUBLIN CITY INDUSTRIAL HERITAGE RECORD

A review of the Dublin City Industrial Heritage Record (DCIHR) has shown that two sites are listed within the proposed development area consisting of filter beds (Dublin

Corporation Water Works) and Lock House. A further 13 structures are found within 250m (Figure 1; Table 1).

TABLE 1: DCIHR sites within 250m of the proposed development

CLASSIFICATION	LOCATION	UPSTANDING REMAINS	DISTANCE FROM PROPOSED DEVELOPMENT
Filter Beds (Dublin Corporation Water Works)	The Grand Canal	Substantial remains	0m
Lock House	The Grand Canal	Yes, incorporated into boundary wall	0m
Canal Tow Path (south)	The Grand Canal	Yes	Immediately north
5th Lock	The Grand Canal	Substantial remains	c. 10m north
The Grand Canal	-	Substantial remains	c. 10m north
Canal Tow Path (north)	The Grand Canal	Partial Remains	c. 24m north
Woollen Mill	Bluebell Avenue	Yes	c. 25m southwest
Electricity Station	Kylemore Way	Unknown	c. 79m northwest
Container Factory	Kylemore Way	Partial Remains	c. 192m northeast
Sheep Dip Factory	Kylemore Way	No	c. 197m northeast
Bridge (RMP DU018-034)	Old Naas Road	Unknown	c. 198m south
Lock House	The Grand Canal	Substantial remains	c. 213m east
4th Lock	The Grand Canal	Substantial remains	c. 223m east
Bridge	Bluebell Avenue	Unknown	c. 229m west
Asphalt Works	Kylemore Way	No	c. 239m northeast

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 (2008–2024) and Apple Maps, revealed that the proposed development area shows the filter beds within the site since c. 1995. The southeast portion of the proposed development area is occupied by four rows of terraced maisonettes with associated access roads. The southwest portion of the proposed development area appears to have been in use as allotments from 2020 to the present (Google Earth, April 2020). The satellite imagery from recent years indicates that the filter beds are no longer in use and are now heavily overgrown (Google Earth, April 2021). Two pylons are also located within the western extent of the proposed development area. No previously unrecorded sites of archaeological potential were noted within the coverage.

An oblique aerial photograph dating to 1948, shows the northern section of the proposed development area with the filter beds present and in use, surrounded by greenfield, with the canal to the immediate north (Plate 2, britainfromabove.org.uk). One of the more recent filter beds (No. 5) is shown to the south of the late 19th century structures.

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. During the course of the field investigation the proposed development site and its immediate surrounding environs were inspected (Figure 1).

The proposed development area is formed by three distinct areas. The eastern portion of the site is occupied by four rows of terraced housing, gardens and access roads, which date to the later part of the 20th century (Plate 3). A bungalow and garden, used for community functions, is located to the immediate west of these structures. The bungalow is marked on the 1944 OS map. The housing area and bungalow are surrounded by modern boundary treatments.

The southern portion of the development area, which was formerly under hard standing and contained a structure and access road, is now in use as allotments. This area is bordered on all side by modern boundary treatments, although the remains of a more mature hedgerow does form part of the northern boundary.

The central and northern portion of the proposed development area is formed by some rough greenfield and the remains of the filter beds, constructed during the later part of the 19th century, and then subsequently extended. The green space contains some trees and comprises rough, uneven ground, with evidence for material dumped around the site (Plates 3 and 4). The western boundary is formed by a mature but overgrown hedgerow containing a number of trees. The eastern boundary is formed by modern fencing that separates this area from the housing to the east. A large pylon occupies the western portion of this area, which carries overhead lines across the site in a north-south direction.

The northern section of the site contains the overgrown remains of the filter beds, which are listed in the DCIHR (Plate 6). The four original stone-built filter beds (No. 1-4) are present to the immediate south of the Grand Canal although the eastern filter bed (No. 1) has been covered (Plates 7-9). The walls of the filter beds were constructed from masonry, but the coping stones (where present) are characterised by blocks of dressed 'rock-faced' granite, typical of Victorian period infrastructure. The two filter beds to the west, and one to the immediate south (of the original features) are more recent and have been formed with poured concrete (No. 5-7). Due to the overgrowth and infilling within the beds, it is not possible to discern the original depth.

The northern boundary of the proposed development area is formed by a stone wall, which is likely contemporary with the construction of the filter beds. The wall comprises a mixture of random and roughly course limestone blocks, which have been roughly dressed. The wall is capped with a curving concrete-render finish, has been painted white and has been supplemented with a modern metal fence (Plate 10). The Grand Canal and 5th Lock are located to the north of the boundary wall.

Several metal containers have been placed against the northern boundary wall, but the probable return wall the screening wall erected to the east of the Lock Cottage (also

included in the DCIHR) is visible (Plate 11). Two joins in the boundary wall (when viewed from the north) shows that when the lock cottage was removed, this section of the boundary wall was built in order to infill the gap.

Whilst the filter beds recorded in the DCIHR remain present within the proposed development area, albeit it in a denuded and overgrown state, no other sites or features of archaeological or cultural heritage significance were noted during the course of the field inspection. A large portion of the overall site has been subject to modern disturbance due to modern construction activities. The remaining 'greenfield' section has been disturbed by ground works associated with the filter beds, as shown on the 1944 OS map.

4 CONCLUSIONS

This archaeological assessment was commissioned by the Land Development Agency to assess the potential for the survival of archaeological and cultural heritage features in advance of a proposed residential development at Bluebell Road, Bluebell, Dublin 12. The assessment has been carried out in accordance with *Framework and Principles for the Protection of the Archaeological Heritage* (1999). The architectural heritage is addressed in a separate report, prepared as part of the development (Loughnane 2025).

There are three recorded monuments within 250m of the proposed development area; a church and graveyard (DU018-033001-02) located c. 100m to the southwest and a bridge (DU018-034), located c. 198m to the south. The zone of archaeological potential for the historic core of Dublin City (DU018-020) is located c. 1.5km to the northeast of the proposed development area.

A review of the DCIHR has shown that two sites are listed within the proposed development area consisting of 19th century filter beds associated with the Dublin Corporation Water Works and the site of a Lock Cottage, adjacent to the 5th Lock on the Grand Canal. The filter beds were built in 1868 by Parke Neville, Dublin's city surveyor, and known as the Fifth Lock Works, intended to supply water to industries in the city.

A review of the Excavations Bulletin (1970–2025) has revealed that no previous archaeological fieldwork has been carried out within the proposed development area. Pre-development testing and monitoring at Bluebell Lodge in proximity to the church (DU018-033001) and graveyard (DU018-033002) failed to reveal anything of archaeological significance.

Cartographic analysis has shown that the proposed development was largely undeveloped until the 19th century, at which time the site is shown as a group of fields, south of the Grand Canal and north of a woollen mill. The 5th Lock of the Grand Canal is located immediately north of the site, with a small structure, a lock house or cottage, located within the proposed development area. By the time of the later Ordnance Survey map of 1910, the proposed development area contained the filter beds located to the south of the 5th Lock and the Grand Canal. The Ordnance Survey map of 1944 shows that the filter beds were extended in the 20th century, which is also confirmed in aerial photographic coverage dating to 1948.

The field inspection confirmed the results of the baseline analysis. The original filter beds remain present in the landscape, albeit in a denuded condition and heavily overgrown. A masonry wall, contemporary with the construction of the filter beds, bounds the proposed development area to the north. The more recent filter beds to the south and southwest of the original features, are also present within the site and were constructed with poured concrete.

The field inspection also confirmed the eastern portion of the proposed development area is occupied by existing housing. The southern portion of the site was formerly developed but is now in use as allotments. The central portion of the site remains as greenfield but has been subject to localised dumping and ground disturbances associated with the filter beds complex.

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

- Filter Bed 1 (Plate 1) will not be affected by the proposed development, although it is located within the wayleave of future Luas development and may be impacted by future works associated with that development.
- Filter Beds 2 and 3 (Plate 1) will be partially retained as sunken gardens. The masonry walls are to be left in their current position with localised repairs where necessary. The southern and western edges of the filter beds will be impacted by the construction of Block 1 of the proposed development. This will necessitate the removal of the filter bed walls down to formation level, but any existing stonework or features below formation level will remain in-situ.
- It is not possible to retain Filter Bed 4 as a sunken garden due to requirements for access and Health and Safety concerns. As such, the eastern section will be removed prior to construction and it is proposed to mark the outline of the filter bed with modern paving within the landscaping associated with the development. The western section will be impacted by the construction of Block 2 of the proposed development. This will necessitate the removal of the filter bed walls down to formation level, but any existing stonework or features below formation level will remain in-situ.
- It is proposed to retain and adapt sections of the northern boundary wall to the development area. As laid out in the architectural heritage assessment (pg 27), sections will be retained in-situ, but other sections will require rebuilding in order to ensure structural integrity. The rebuilt sections of the wall will be refaced with stone from the original wall. The existing and relatively recent cement capping on the wall will be removed in order to promote permeability and passive surveillance of the public spaces.

There will be an overall negative impact on the filter beds given they will be either covered by the proposed development or repurposed into a garden landscape. The negative effect is partially ameliorated by the incorporation of the filter beds into the development, which is a positive impact in terms of highlighting the industrial heritage of the site in the development area.

Sections of the boundary wall will be incorporated into the development, albeit some sections require reconstruction due to structural stability. The retention of sections of the wall is a positive impact in terms of incorporating industrial heritage into the proposed development.

Furthermore, following the completion of investigation and recording of the industrial heritage features on site, proposals for interpretive heritage panels will be agreed with the Dublin City Archaeologist, which will be erected within the publicly accessible portions of the site.

- No impacts are predicted upon the archaeological resource within the eastern or southern portion of the development area, due to the level of modern development that has taken place in these areas. This earlier development would have resulted in the removal of any archaeological features that may have been present.
- The central 'greenfield' portion of the development area has been subject to ground disturbance associated with the existing filter bed complex and subsequent dumping. Although the overall archaeological potential of this area is low, it remains possible that ground disturbances associated with the proposed development have the potential to directly impact on previously unrecorded archaeological remains that may be located beneath the current ground level.

5.2 MITIGATION

- Prior to the commencement of construction, all vegetation within the 19th century filter beds (No. 1-4) will be removed in order to allow for a full measured survey and plan of the features to be made. This will also include the removal of soils that have accumulated since the decommissioning of the beds. The survey will include the northern boundary wall. The measured survey will be accompanied by a written record and include, as appropriate, sections and elevations of the filter beds. The survey will be carried out by a built/industrial heritage specialist with appropriate survey support.
- Following the measured survey, appropriate recommendations will be made by a Conservation specialist regarding repairs that are required for the walls to be retained as part of the development.
- The removal of the walls associated with the development of Blocks 1 and 2 and the public space (Filter Beds 2/3/4) will be conducted as an archaeological exercise in the first instance, in order to record the construction of the beds and any other features that may be present. This will be carried out with the relevant support in order to remove any Health and Safety risks associated with working at depths (within the filter beds). The removal of the walls will be subject to careful archaeological monitoring.

- Despite the low archaeological potential of the development area, it remains possible that archaeological features survive beneath the current ground level within the central portion of the development area. As such, prior to construction commencing, a programme of archaeological testing will be carried out across the accessible portions of the site. This will be carried out under licence to the National Monuments Service of the DoHLGH. 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.
- No archaeological mitigation is required for the southern and eastern portions of the proposed development area.

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

William Petty, Down Survey Map of the Barony of Newcastle and Parish of Clandalkin, c. 1655

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

John Taylor, Map of the Environs of Dublin, 1816

William Duncan's Map of the County of Dublin, 1821

Ordnance Survey maps of County Dublin 1843, 1871, 1910 and 1944

ELECTRONIC SOURCES

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

www.archaeology.ie – DoH/LGH 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).

www.googleearth.com – Satellite imagery (2005–2024).

www.apple.com/maps/ – Satellite imagery (2024).

www.buildingsofireland.ie – The National Built Heritage Service.

APPENDICES

APPENDIX 1 SMR/RMP SITES WITHIN THE STUDY AREA

SMR NO.	DU018-033001
RMP STATUS	Yes
TOWNLAND	Bluebell
PARISH	Drimnagh
BARONY	Uppercross
I.T.M.	710527 , 732371
CLASSIFICATION	Church
DIST. FROM DEVELOPMENT	c. 100m southwest
DESCRIPTION	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).
REFERENCE	www.archaeology.ie/ SMR file

SMR NO.	DU018-033002
RMP STATUS	Yes
TOWNLAND	Bluebell
PARISH	Drimnagh
BARONY	Uppercross
I.T.M.	710527, 732371
CLASSIFICATION	Graveyard
DIST. FROM DEVELOPMENT	c. 100m southwest
DESCRIPTION	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 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).
REFERENCE	www.archaeology.ie/ SMR file

SMR NO.	DU018-034
RMP STATUS	Yes
TOWNLAND	Bluebell / Drimnagh
PARISH	Drimnagh
BARONY	Uppercross
I.T.M.	710674, 732306
CLASSIFICATION	Bridge
DIST. FROM DEVELOPMENT	c. 198m south
DESCRIPTION	The present bridge is on the site of a bridge which is marked on the Down Survey (1655-6) parish map.
REFERENCE	www.archaeology.ie/ SMR file

APPENDIX 2 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.

Section 15.15, pg. 629, Chapter 15 (Development Standards):

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

APPENDIX 3 IMPACT ASSESSMENT AND THE CULTURAL HERITAGE RESOURCE

POTENTIAL IMPACTS ON ARCHAEOLOGICAL AND HISTORICAL REMAINS

Impacts are defined as ‘the degree of change in an environment resulting from a development’ (Environmental Protection Agency 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 4 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.









-  Filter bed to be left untouched
-  Filter bed to be retained and adapted.
-  Position of filter bed position to be marked in landscape
-  Portion of filter bed walls below formation level to be retained in situ and recorded before being covered over.
-  Non-original concrete filter beds to fully removed.
-  Section of fence to provide a view to filter bed O1.

Plate 1: Extract from the HJ Lyons Design Statement, showing the filter beds in relation to the proposed development

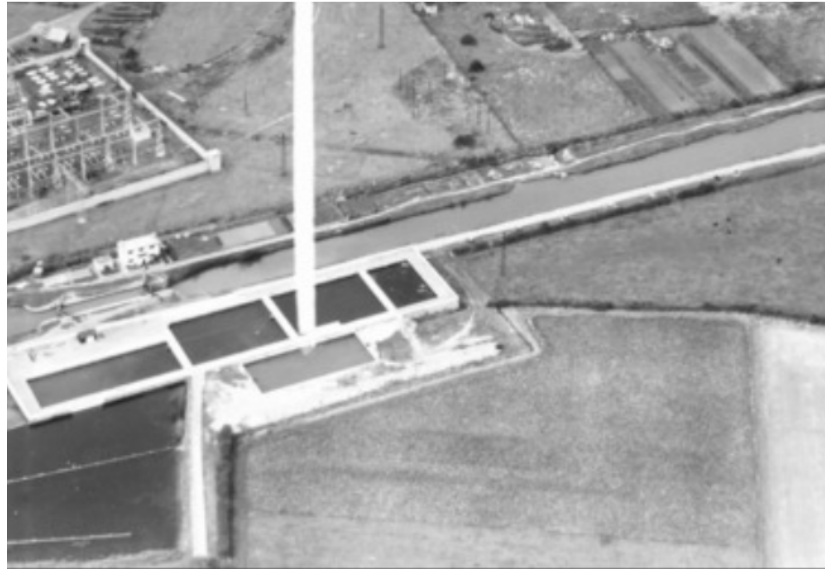


Plate 2: Northerly view of the filter beds within the development area (1948)



Plate 3: Terraced housing in the eastern section of the site, facing east



Plate 4: Central portion of the proposed development area, facing northeast



Plate 5: Central portion of the proposed development area, facing southwest



Plate 6: Site of overgrown filter beds, facing east-northeast



Plate 7: 19th century filter beds, facing east-northeast



Plate 8: Eastern most filter bed, now covered, facing northeast



Plate 9: Detail of granite coping stones, facing east-northeast



Plate 10: Northern boundary wall, facing northeast



Plate 11: Return of screening wall associated with the Lock Cottage, facing northwest



NOTE:
 ALL DIMENSIONS TO BE CHECKED ON SITE.
 NO DIMENSIONS TO BE SCALED FROM THIS DRAWING.
 THIS DRAWING IS TO BE READ IN CONJUNCTION WITH
 RELLEVANT CONSULTANTS DRAWINGS.

PLEASE REFER TO THE LANDSCAPE ARCHITECTS
 REPORT AND DRAWINGS FOR LANDSCAPE DETAILS

PLEASE REFER TO ENGINEER DRAWINGS FOR
 DETAILS ON ROAD SURFACE.

APPLICATION SITE BOUNDARY

REV	DATE	DESCRIPTION	BY	CHKD

PLANNING

Henry J Lyons

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Client
 The Land Development Agency
 on behalf of Dublin City Council

Project
Bluebell Waterways
 Lands at Bluebell Road & Bluebell Avenue,
 Dublin 12

JOB NUMBER:	MS1135
DATE:	07/03/2022
SCALE:	1:500/0.1
DRAWN:	LP
CHECKED:	MB
FILE NAME:	S1 P0005-Proposed Site Layout Plan

PROPOSED SITE LAYOUT PLAN

NO	DATE	REVISION

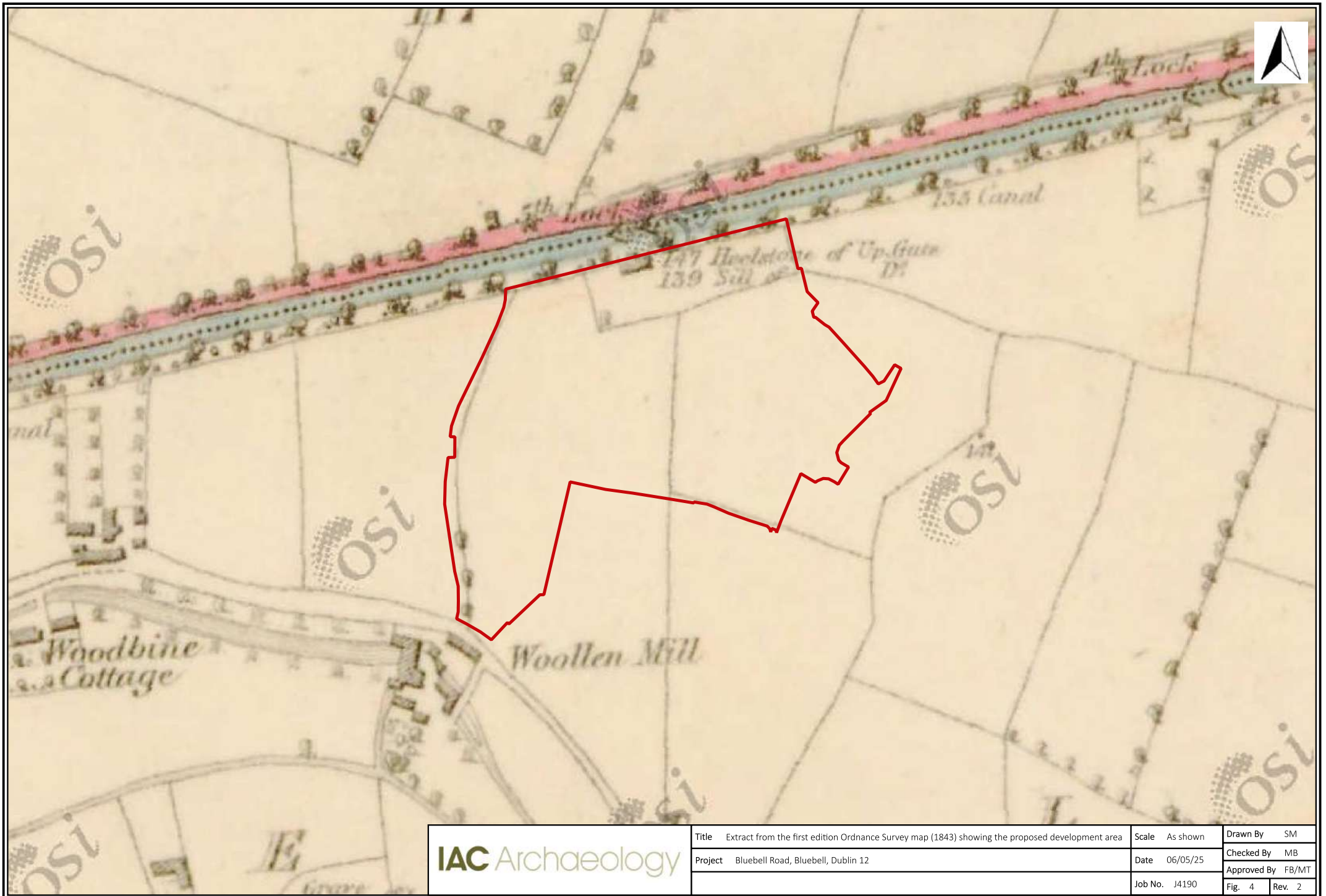


Title	Plan of proposed development	Scale	As shown	Drawn By	SM/RL
Project	Bluebell Road, Bluebell, Dublin 12	Date	06/05/25	Checked By	MB
				Approved By	FB/MT
Job No.	J4190	Fig.	2	Rev.	2



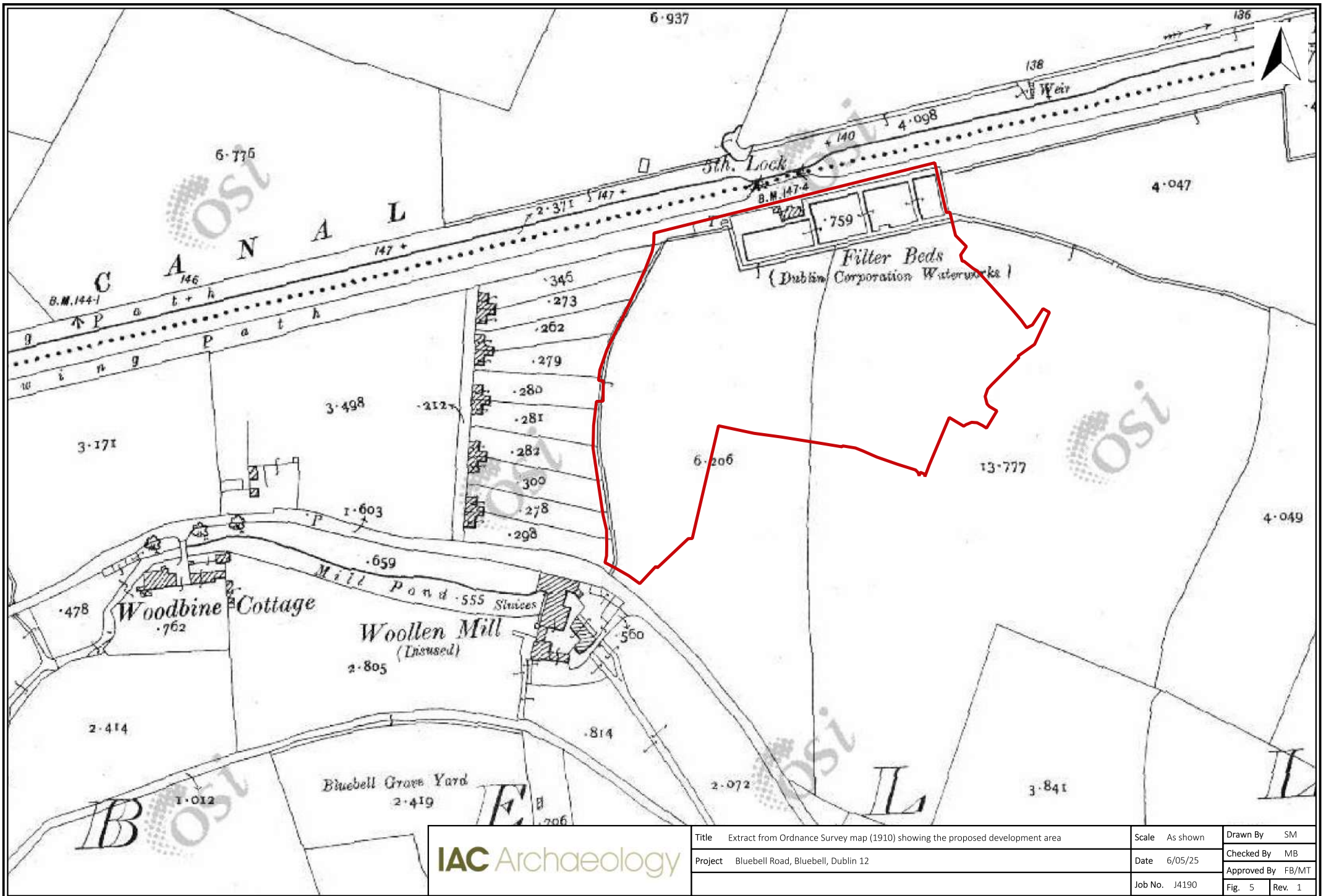
IAC Archaeology

Title	Extract from Rocque's map (1760) showing approximate location of proposed development area	Scale	As shown	Drawn By	SM
Project	Bluebell Road, Bluebell, Dublin 12	Date	09.09.2024	Checked By	MB
				Approved By	FB/MT
		Job No.	J4190	Fig.	3
				Rev.	-



IAC Archaeology

Title	Extract from the first edition Ordnance Survey map (1843) showing the proposed development area	Scale	As shown	Drawn By	SM
Project	Bluebell Road, Bluebell, Dublin 12	Date	06/05/25	Checked By	MB
				Approved By	FB/MT
		Job No.	J4190	Fig.	4
				Rev.	2



IAC Archaeology

Title	Extract from Ordnance Survey map (1910) showing the proposed development area	Scale	As shown	Drawn By	SM
Project	Bluebell Road, Bluebell, Dublin 12	Date	6/05/25	Checked By	MB
		Approved By	FB/MT	Fig. 5	Rev. 1
		Job No.	J4190		