

**Brief of Evidence  
Architectural Heritage, Archaeological and Cultural Heritage  
Proposed Waste to Energy Project  
Oral Hearing**

By

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April 2007



## **Summary of Evidence**

The purpose of the cultural heritage impact assessment for the proposed Waste to Energy Project (the Project) is to:

- Assess and describe the architectural, cultural and archaeological heritage of the proposed Project site.
- Identify and evaluate the significance of the impact of the Project on the receiving environment
- Propose appropriate measures for the avoidance or mitigation of these impacts within the design of the proposed development.

This section of the EIS was compiled having regard to the principal statutes which provide protection to the architectural, cultural and archaeological heritage. These statutes are detailed in the appendices (16.7 National Monuments Legislation; 16.8 Local Government (Planning & Development Act) 2000). The sources and archives availed of during the study were:

- The Record of Monuments and Places (RMP)
- The Sites and Monuments Record (SMR)
- Topographical Files of the National Museum of Ireland (NMI)
- Protected Structures in the Dublin City Development Plan 1999
- Dublin Docklands Area Master Plan *Inventory of the Architectural and Industrial Archaeological Heritage*
- The Shipwreck Inventory of the Underwater Archaeological Unit of the Department of the Environment, Heritage and Local Government
- Dublin City Development Plan 2005-2011
- Historical cartographic sources
- Aerial photographs
- Referenced documentary and literary sources

## **Consultation**

Consultation took place with relevant bodies:

Lead consultants Arup; RPS Group; and Underwater Archaeological Unit of the National Monuments Section of the Department of the Environment, Heritage & Local Government.

## **Brief Archaeological and Historical Context of the area**

- The proposed Dublin WtE facility will be located on the Poolbeg Peninsula, mainly south of Pigeon House Road. Located to the north of the proposed development is the recorded monument of the sea wall or embankment (DU019:029-01). Historical and cartographic sources point to an earlier sea wall (DU019:029-02) being located along the line of the Pigeon House Road. The sea walls were initially constructed to prevent the build up of deposits within the main navigational route of the River Liffey.
- The cultural heritage of Pigeon House Road is related with the development of the peninsula. Pigeon House Road now follows the alignment of the sea wall constructed in the eighteenth century, delimiting the northern edge of the south bull sands. The sea wall is afforded protection as a recorded monument, RMP DU019:029.
- The earliest documented activity along the sea wall is connected with the development of Pigeon House Harbour adjacent to a sand bank known as the Green Patch in the eighteenth century. The harbour, situated 150m east of the proposed location of the proposed treatment plant, evolved as a military strongpoint in the nineteenth century, and Pigeon House Fort is similarly afforded protection as a recorded monument, RMP DU019:027. This building has been previously compromised and is no longer intact. A power station was constructed on part of this Pigeon House Fort in 1902, leaving only remnants of this protected site present today. In the twentieth century, a portion of the proposed development site was used as a landfill. It is located within an existing development which is overwhelmingly industrial in character and constitutes a visual collection of container stacks, silos, warehouses, etc. The setting and the site therefore has already been compromised due to the extensive industrial surroundings.
- There are no protected structures located within the proposed Dublin WtE facility site. A number of structures along Pigeon House Road have protected structure status and are listed as protected structures in the Dublin City Development Plan 2005-2011, including the former Pigeonhouse Hotel and surviving remnants of the fort; the former St. Catherine's Hospital; and Pigeon House power station. These can be found in Appendix 16.5 of the EIS and will not be affected by the proposed development. Both the Dublin City Development Plan and the Draft Poolbeg Framework Plan identify this urban environment as an area of existing industrial land use and zoning.
- The area to the east of the proposed facility is utilised as an amenity area and is dominated by the two landmark ESB towers.

### **Site Inspection**

The aim of the site inspection was to:

- Examine any above ground evidence of the sea wall (DU019:029)
- Confirm that no site of architectural heritage or cultural merit was located within the proposed development area
- Record where necessary the exact location, extent and possible character of newly revealed features

## **Findings**

No protected structures or structures of an architectural heritage merit are located within the proposed facility site.

No features of cultural heritage were noted within the proposed site during the course of the site inspection.

There are no recorded archaeological monuments within the proposed facility site. Pigeon House Road is located to the north of the proposed Dublin WtE Facility. The northern edge of the road is bounded by a footpath and a low rubble stone wall approximately 80cm in height. This low wall according to historic and cartographic sources follows the line of the sea wall (DU019:029) constructed along the line of Pigeon House Road.

Directly opposite the proposed facility to the north of Pigeon House Road is a watercourse. This is the existing cooling water channel of the Synergen Power Plant. The route of the cooling water pipes associated with the proposed Dublin WtE facility will run along the eastern section of this watercourse and will bridge the line of the recorded monument, sea wall (DU019:029). The area appears to have been disturbed in recent times with the construction of the existing cooling water channels. However, there is potential for archaeological material to be uncovered during construction of the pump house and installation of associated sheet pile walling. The proposed development will therefore have an indirect impact on the line of the sea wall (DU019:029) and a potential impact on any previously unrecorded maritime archaeology.

## **Mitigation Measures**

### *Sea Wall*

The proposed facility includes the provision of cooling water pipes in the vicinity of the recorded monument, sea wall (DU019:029). Section 16.3.4 of the EIS states how the route of the cooling water pipes associated with the Project will run along the eastern section of an existing watercourse north of the proposed development. The proposed design will avoid the line of the monument, sea wall (DU 019:029), as the associated water pipes will bridge the feature.

However, as the supports are located within the constraint area of the sea wall (the area of archaeological potential associated with a recorded structure) it is recommended in section 16.6.4 that all ground breaking and earthmoving activity be archaeologically monitored under licence to the Department of Environment, Heritage and Local Government at the site preparation stage and throughout the development so archaeological material is recognised and recorded.

### *Maritime Archaeology*

Consultation has taken place with the Underwater Archaeological Unit of the Department of Environment, Heritage and Local Government in respect to the existing water channel. The Department stated on 4<sup>th</sup> April 2007 that all aspects of the development that impacts areas in the foreshore or underwater will be subject to an underwater archaeological assessment. This assessment should incorporate an intertidal, geophysical (if areas to be developed prove to be too large to diver survey) and underwater survey. A written report of the findings will be submitted to the department in advance of any work commencing. The report will contain a detailed impacts statement and put forward recommendations for further archaeological mitigations should they be deemed necessary.

Much of the proposed development area consists of fill material imported into the area during reclamation works in the 18<sup>th</sup> and 19<sup>th</sup> centuries. As such the likelihood of construction and site preparation works revealing archaeological deposits is considered slight.

### *Terrestrial Archaeology*

The majority of the proposed development area consists of fill material imported into the area during reclamation works in the 18<sup>th</sup> and 19<sup>th</sup> centuries. As such the likelihood of construction and site preparation works revealing archaeological deposits is considered slight.

While every effort has been made to avoid direct impacts on archaeological features all archaeological finds or features revealed will be recorded appropriately prior and during the construction of the proposed development in agreement with the National Monuments Section of the Department of Environment Heritage and Local Government. All archaeological work will be conducted in accordance to the requirements of the Department of Environment, Heritage and Local Government and the National Museum of Ireland.