

**Regarding an application for a major waste dump at N** Date Rec'd: 10/03/08  
**Dublin (Fingal County Council), ref. EL2051** 9.40 a.m.

I wish to submit archaeological observations on this application, which has only recently come to my notice. These should be read as an objection to the application.

### General

A planning application has been submitted to An Bord Pleanála, accompanied by a detailed Environmental Impact Statement, for a major waste dump covering (with its associated works) more than two square kilometres (over 200 hectares), at Nevitt, Co. Dublin. It is my wish in the notes that follow to raise issues that have not, I believe, been given due weight by the archaeologists who have been commissioned by Fingal County Council to produce the archaeological impact statement. I have no criticism to make of the quality of the archaeological work, but I am critical of the interpretation of that evidence.

### The place-name Nevitt.

The place-name expert Donal Mac Giolla Easpaig has commented upon the place-name Nevitt, concluding that it is derived from the Old Irish *Neimed*, and that this example is both unique within Ireland and is demonstrably early in its form. It derives from the Celtic *Nemeton* which meant, in Romano-Celtic Europe, 'sacred place', particularly a sacred grove, a sacred clearing in a wood or a shrine in such a place. The Old Irish *Neimed* originally meant a 'sanctuary' or 'sacred grove', but became widened under Christian influence to mean a 'holy place' or even a 'holy or noble person'. This unique, early place-name implies that this place was not just a 'pagan sacred grove', but the main 'pagan sacred grove' for the region, or even for Ireland. In Britain and on the Continent a number of places containing the element *Nemeton* are recorded in Roman texts. One of these, an area of forest in Devon, retained its sacredness late into the Christian period and local village place-names retain variants of the *Nymet* name. No Irish place with this element is recorded in Roman texts, but as these are sparse this is not surprising.

It should be noted that only two kilometres north-west of Nevitt is the 'hill-fort' of Knockbrack. This is not strictly a hill-fort, but, with its internal ditch, appears rather to be a sacred enclosure of either Neolithic or Iron Age date (comparable with Tara or Navan) and implies a sacred status for its surrounding hinterland. The area from Rush inland as far as Tara was demonstrably the recipient of major Romano-British incursions during the first four centuries AD. Roman-British material has been found at Drumanagh, Ratoath and many other places (including Damastown just west of Nevitt) and Romano-British shrines have been found at Randalstown, Newgrange and Ashbourne. Were a sacred grove to have been made, or used, by these intruders it is likely have been called a *Nemeton*.

### The archaeology.

The company employed to assess the archaeology of the footprint of the proposed development undertook a fairly detailed and extensive procedure of exploration. They

identified very few visible or previously recorded monuments - certainly none that would have justified questioning the project. They undertook an extensive geophysical survey and a fairly small (proportionally) amount of test 'excavation' (basically hand-finished machine stripping).

Almost the whole area of the proposal was subjected to what is described in their report as geophysical 'scanning', in which geophysical features are sought (but not recorded) for more detailed scanning later. This is nothing like as useful as it would appear. The scans were at 10 metre intervals, which will satisfactorily pick up extensive linear features but are likely to miss most smaller features. Furthermore the gradiometer is not good at picking up features that do not contain burnt material or burnt soil and cannot be regarded as a thorough search tool. About 15% of the total area was then surveyed, again using the magnetometer, in a far ore detailed fashion. A number of striking archaeological features were detected by this method, although most of the areas surveyed failed to show any clear evidence of ancient use. Again I would draw attention to the disadvantage of the magnetometer - with this machine absence of evidence (an anomaly) is not evidence of absence. Furthermore I regard a 15% area survey as inadequate.

A small number of the anomalies discovered by the geophysical process were so outstanding that the proposers agreed to modify the plans to exclude them from destruction or damage. Some others, less spectacular, were tested by machine 'excavation' - with uncertain results. Some extremely interesting features were flagged as candidates for 'preservation by record' (that is, for rescue-excavation prior to destruction)\*. As only 15% of the area was surveyed in detail the number of very interesting geophysically-identified sites should be multiplied six-fold to indicate the potential of the whole area to be developed. My chief criticism, however, is that each area that produced an interesting geophysical signal was assessed individually, and with little or no consideration given to its part in the whole picture. In fact the snapshot we have indicates a very rich archaeological potential for the whole foot-print, with some strange and perhaps highly important enclosures indicated (including possible shrines - sites B & E - both to be destroyed).

**Conclusion**

I believe a strong case can be made, on the evidence of the place-name, for the former existence of a late-prehistoric sacred grove, or sacred forest clearing, and associated shrine(s), in or very close to the townland of Nevitt. I believe the archaeological assessors should have realised this potential and made it clear to the proposers at the beginning of the project. This potential alone should have ruled this townland out as a candidate for destructive development. The geophysical results, inadequate though they are, indicate that the area of the proposal is very rich archaeologically - a status which, when added to the place-name evidence, suggests to me that the proposal should be dismissed on heritage grounds.

**note \*** I reject, as do many academic archaeologists, the phrase 'preservation by record' that is now being widely used by contract archaeologists and politicians as a mitigatory euphemism for destruction. It is used frequently in this Environmental Impact Statement. There is no such thing as 'preservation by record'. The concept is no more meaningful or acceptable in field archaeology than it would be if applied to

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rare books in the National Library or artefacts in the National Museum. Excavation is an attempt to obtain some information - usually very inadequately - before a site is destroyed. The record so obtained does *not* represent preservation but partially mitigates destruction.

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June 2006

Extra Notes added in March 2008.

Since the above was written I have discovered that archaeological opinion in Britain and abroad would hold that the original meaning of Nemet was something more substantial than a 'sacred grove', and that it should always be taken to refer to a physical entity of some sort with a sacred function – a building, a wooden structure or an enclosure. A 'grove' might be expected at or near a sacred structure but was not the reason for the use of the name.

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**Nemed extra**

From: **Richard Warner** (richard@omeadhra.plus.com)  
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 Sent: 09 March 2008 15:07:49  
 To: paddyboylerush@hotmail.com

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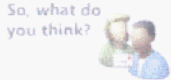
This might help to clarify some of the points I have made in discussion:

The use of geophysical methods (usually Magnetometry - or one of its variants such as Magnetic Gradiometry - and Electrical Resistance or its variant Resistivity) are of immense use in non-invasive archaeological study. But they are also limited - the former reacts to burning, burnt soil etc and the latter to major differences in, for instance, wetness or compactness (the electrical resistance) in the soils. There are plenty of instances (I have been involved in several) in which known, substantial features (such as deep ditches) failed to show up with either of the techniques. In other words the old adage applies - **the absence of (geophysical) evidence is NOT evidence of absence (of archaeological remains)**. The geophysical methods are not an alternative to excavation. It must also be said that buried metal objects, even gold hoards in small pits (as at the great ritual site of Snettisham in Norfolk), will at best show as 'spikes' in the Magnetometry data. Short of excavation there is no way of identifying the meaning of these spikes and they will, unless a pattern is seen, be invariably interpreted as iron machinery parts, or even just 'noise'.

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