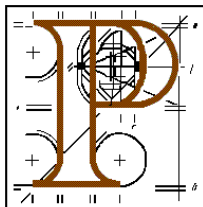


An Bord Pleanála



Inspector's Report

Site Address: Lisgaugh, Doon, Co. Limerick.

Proposal: Demolition of the former St. Joseph's Secondary School building and remedial and associated site works.

Planning Application

Planning Authority: Limerick City and County Council

Planning Authority Reg. Ref.: 14/1210

Applicants: The Educena Foundation

Type of Application: Permission

Planning Authority Decision: Refuse

Planning Appeal

Appellant: The Educena Foundation

Type of Appeal: 1st party -v- refusal

Observers: None

Date of Site Inspection: 16th January 2016

Inspector: G. Ryan

1.0 SITE

- 1.1 Doon is a small village in southeast County Limerick. It is arranged along an east-west spine which forms part of a regional route.
- 1.2 The site itself consists of a disused school and its attendant grounds on a roughly rectangular site on the eastern edge of the village centre. The main entrance is in the site's northeastern corner, and this entrance provides access to 3rd party lands also. The site has a stated area of 0.85ha and the gross floor area of the existing buildings on site is 3,544m².
- 1.3 The buildings and the site are very well documented on file, and as such there is little to be gained from an in-depth description on my part at this point.
- 1.4 There is a convent building related to the school buildings to the west of the site, but these lands do not form part of the subject site under this application.

2.0 PROPOSAL

2.1 BROAD OUTLINE

- 2.1.1 The proposed development consists of the demolition of all buildings on the site. Unusually, there are no proposals for any element of construction following the demotion of these buildings.
- 2.1.2 The application is accompanied by a report from HRA Planning. Much of the content of this report is replicated in the appeal grounds at 7.0 below. Other aspects of note can be summarised as follows.
- 2.1.3 5m of the perimeter wall to the west of the entrance would need to be temporarily removed in order to facilitate demolition works. Third party access to lands using the entrance would be maintained during demolition. Hours of operation would be 7am-7pm weekdays and until 5pm on Saturdays, and would take approximately 3 months. Noise, dust, and surface water runoff would be controlled.
- 2.1.4 The report 'screens out' for appropriate assessment.

2.2 ARCHITECTURAL, CONSERVATION, AND CULTURAL HERITAGE ASSESSMENT

- 2.2.1 This report, prepared by Judith Hill – Architectural Historian – accompanies the application. Aspects of note from the report can be summarised as follows.

- 2.2.2 Neither the school nor the convent are listed as protected structures, and neither are located in an Architectural Conservation Area. The Convent is listed in the NIAH as being of Regional Importance, whereas the school is listed as being of Local Importance.
- 2.2.3 The report describes the school in detail, along with its relationship to the adjacent convent. There is no formal barrier between the two complexes. [It should be noted that this report would appear to employ a different block/building numbering convention than the submitted drawings]
- 2.2.4 The report provides a brief history of the convent and school. The school was set up in 1867 and first opened in 1868. The current school buildings date initially from the mid-1890s, and were extended and amended during the 20th century.
- 2.2.5 Taken as a whole, the school does not have significant architectural merit. Within the group, there is no one building that can act as focus. The buildings are not without notable features, but there are not enough of them and they are insufficiently concentrated to give the buildings anything other than general historical interest.
- 2.2.6 The school buildings do not make a significant contribution to the current physical landscape setting or to the historic landscape setting of the convent.
- 2.2.7 The school buildings cannot be fully appreciated from the road and do not contribute to the streetscape.
- 2.2.8 The report recommends that the school buildings be demolished subject to retention of the wall with the carriage gate, the salvage of building materials, that some reminder of the school be retained, and that the treatment of the boundary between school and convent be enhanced.
- 2.2.9 The report is accompanied by a number of photographs.

2.3 UNSOLICITED FURTHER INFORMATION

- 2.3.1 The applicant submitted a response to the submission from the DoAHG. This response addressed efforts made by the applicants to sell the site.

2.4 FURTHER INFORMATION REQUEST AND RESPONSE

- 2.4.1 Prior to issuing a decision, the planning authority sought further information on 5 points, which can be summarised as follows, along with the response from the applicant.

Planning authority request	Applicant's response
<p>1. <i>Revisit the architectural, conservation and cultural heritage assessment to identify on plan and elevation the parts of the School with architectural heritage merit and the extensions and additions which have no architectural merit, assessing the possibility of retaining blocks 1 and 2 with and without combinations of extensions/additions (and boundary walls and gates) which offer architectural coherence in terms of character, useable space and circulation.</i></p> <p><i>In undertaking this work, the report should be amended to be made cohesive with the drawings submitted with the identification numbers on the drawings to tie in with the blocks and units described or mentioned in the report;</i></p> <p><i>Full Archival Standard Photographic Study of the existing buildings and the plot upon which they stand, accompanied by a cartographic key that depicts the location and direction of the camera at the time that each image was exposed, that illustrates their character, context and finishes;</i></p> <p><i>Drawings are to be colour coded to reflect the periods of construction of the blocks and unit.</i></p>	<p>The response reiterates the findings of their report by Judith Hill, which concluded that the buildings do not present substantial features of conservation interest worth of retention.</p> <p>The response discusses the relationship between the buildings proposed for demolition and i) the convent and ii) the streetscape.</p> <p>An archival photographic study could be undertaken by way of condition.</p>
<p>2. <i>Revise proposals to retain the optimum combination of blocks 1 and 2 as suggested by the expanded architectural heritage assessment above.</i></p>	<p>The report reiterates the assertion that there are no grounds to retain any of the buildings.</p>
<p>3. <i>Submit proposals for making weather tight and mothballing the retained buildings as well as careful dismantling and making good of extensions to be removed, which should be advised by an architectural conservation professional.</i></p>	<p>The report reiterates the assertion that there are no grounds to retain any of the buildings.</p>

Planning authority request	Applicant's response
4. <i>Revised proposals to take account of the location of the proposed development and the long-standing Council policy to respect the existing streetscapes of our towns and villages.</i>	The report reiterates the assertion that there are no grounds to retain any of the buildings. The boundary wall would be retained.
5. <i>The site layout plan submitted indicates one no. access point only serving the site. Sightlines at the entrance indicated on the site layout plan are severely restricted and in terms of the potential traffic generated by the demolition works the applicant is requested to clarify sightlines at the entrance and submit details of a traffic management plan to manage traffic generated by the works.</i>	A traffic management plan is included.

Table 1

3.0 SUMMARY OF REPORTS TO THE PLANNING AUTHORITY

3.1 DEPARTMENTAL REPORTS (PRE FURTHER INFORMATION)

3.1.1 Fire Officer

3.1.2 No objections

3.1.3 Environment Section

3.1.4 No objections subject to conditions.

3.1.5 Executive Archaeologist

3.1.6 No archaeological issues arise in regard to this application.

3.1.7 Conversation Officer's first report

3.1.8 It is the planning authority's intention to process the Convent and Chapel for inclusion in the RPS when reviewing the County Development Plan. The CO notes that these are the subject of ministerial recommendations under the provisions of Section 53 of the Planning and Development Act 2000.

3.1.9 The proposed demolitions are contrary to best practice in the area of architectural conservation, sustainable development, and economic planning.

- 3.1.10 Further information should be sought, expressing the planning authority's serious concerns in respect of the proposal. The report outlines specific detailed issues the CO has with the Architectural Conservation and Cultural Heritage Assessment.

3.2 EXTERNAL CONSULTEES

3.2.1 Department of Arts, Heritage, and the Gaeltacht

- 3.2.2 The convent has not been added to the Record of Protected Structures, although it was subject to a Ministerial recommendation to do so.
- 3.2.3 The Architectural, Conservation, and Cultural Heritage Assessment submitted with the application is noted. However, in light of the proposal to entirely demolish the structures, it would have been helpful to examine the potential to limit demolition to the buildings or extensions of no particular architectural heritage merit.
- 3.2.4 The photographs available indicate that the original school buildings and indeed the village of Doon has a pleasing architectural heritage character, with the eastern entrance to the village flanked by the school and convent on one side. There are many buildings in the village included on the NIAH. The CDP does not include an ACA for Doon. It is not clear if consideration has been given to doing so.
- 3.2.5 The proposed development should be scrutinised closely on sustainability grounds due to – inter alia – the option of regeneration and reuse of these buildings.
- 3.2.6 The department suggests that Buildings 1 and 2 (as per architectural heritage report) should be considered for retention.
- 3.2.7 The department recommends further information and revised proposals based on the above comments, along with proposals for making weathertight and mothballing the retained buildings.

3.2.8 Environmental Health Officer (HSE)

- 3.2.9 No objections subject to conditions.

3.2.10 An Taisce

- 3.2.11 The proposed development has not been justified. The building could provide a valuable new community use. Notes the building's inclusion in the NIAH. It forms an ensemble relationship with the adjoining convent. Its demolition would result in the diminishment of the value of this group of buildings which contribute to the character of the village of Doon.

3.3 REPRESENTATIONS

3.3.1 No 3rd party submissions were received

3.4 PLANNING OFFICERS FIRST REPORT (PRE FURTHER INFORMATION)

3.4.1 Notes the buildings' inclusion on the NIAH. The report includes a number of photographs of the site.

3.4.2 'Screens out' for Appropriate Assessment.

3.4.3 The school buildings contribute to the architectural, cultural, social, and artistic value and history of Doon, and a more detailed architectural assessment is required. The planning authority would seek the retention, adaptation, and re-use of the buildings of architectural merit in line with best practice conservation principles.

3.4.4 The eastern part of the site is in 'Flood Zone A'.

3.4.5 Sightlines at the entrance are severely restricted.

3.4.6 Recommends requesting further information on 5 points, which reflect many, but not all, of the points sought by the conservation officer.

3.5 DEPARTMENTAL REPORTS (POST FURTHER INFORMATION)

3.5.1 Conversation Officer's second report

3.5.2 The CO's report reiterates objections to the proposed development, and includes suggested conditions, should permission be granted.

3.6 PLANNING OFFICERS SECOND REPORT (POST FURTHER INFORMATION)

3.6.1 Concurs with the CO's report. The proposed development would be detrimental to the streetscapes, architectural character, plot pattern, street patterns, and local architectural heritage and local social history of Doon.

3.6.2 Notes that no report has been received from the Area Roads Office in respect of the submitted traffic management plan.

3.6.3 Recommends refusal.

4.0 PLANNING AUTHORITY DECISION

The planning authority decided to refuse permission for one reason, as follows

- 1. The development, if permitted, would damage the integrity of the evolved historic streetscape and be detrimental to the architectural heritage and social history of the area and would materially contravene Objective EH 037: General Protection of Architectural Streetscapes and Objective EH 031: General Protection of Structures as set out in the Limerick County Development Plan 2010-2016. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*

5.0 HISTORY

There is no relevant planning history on file relating to the subject site, nor referred to by the parties to the appeal.

PA Ref. 11/880 – Permission granted for the new-build school to the south of the town to which the students from the school on the subject site were moved.

6.0 POLICY

6.1 LIMERICK COUNTY COUNCIL DEVELOPMENT PLAN 2010-2016

Doon is a 'Tier 4' settlement in the county plan. There are no landuse zonings applicable.

Section 7.3 of Appendix 1 of the plan consists of a section devoted to Doon. It states that the town has a population of 439 (2006), and that in recent times, permission has been granted for a total of 90 houses. There are a number of vacant retail and residential buildings in the core. The Department of Education and Science propose to develop a new school on lands to the South of the village, which the Council supports in principle. The accompanying map indicates that the settlement core extends to a point 75m west of the subject site, at the Monastery Road junction in front of the convent.

6.1.1 Architectural Heritage Objectives

Neither the convent nor the school are listed in the Record of Protected Structures.

The following policies are cited by the planning authority in their refusal reason

Objective EH O31: General Protection of Structures

It is the objective of the Council to:

- a) seek the protection of all structures (or, where appropriate, parts of structures) within the County, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest and listed in the Record of Protected Structures. The record will continue to be developed on an ongoing basis, as resources permit, in accordance with the criteria laid down in the Architectural Heritage Protection Guidelines for Planning Authorities.*
- b) As resources permit, determine the extent of the curtilage of protected structures.*

Objective EH O37: General Protection of Architectural Streetscapes

It is the objective of the Council to protect the character of the medieval towns, postmedieval features and 18th – 19th streetscapes in the County having due regard to their architectural character, plot pattern and street patterns when assessing planning applications for development.

6.1.2 Development plan review

The 2010-2016 County Development Plan is – all else being equal - coming towards the end of its natural life. In investigating the status of any draft plan, I noted the following from the council’s website.

In September 2015, in accordance with Section 28 of the Electoral, Local Government and Planning and Development Act 2013, the Planning Authority proposed not to commence the review of the Limerick County Development Plan 2010 - 2016 and the Limerick City Development Plan 2010 - 2016. Therefore the County Development Plan will continue to have effect until a new Development Plan for Limerick City and County is prepared.

Section 11B requires that within 12 months of the making of regional planning guidelines that take into account the amalgamation of the administrative areas concerned, i.e. Limerick City and County Council, the preparation of a development plan for its administrative area must commence. The preparation of the Regional Guidelines is due to commence this year. It is expected that the review of the Development Plans will commence by the end of 2016 or early 2017.

6.2 NATIONAL INVENTORY OF ARCHITECTURAL HERITAGE

- Sisters of Mercy Convent – Rating: ‘Regional’
- Chapel of Reparation to the Sacred Heart of Jesus – Rating: ‘Regional’
- Sisters of Mercy National School – Rating: ‘Local’

The 1st and 2nd entries in the NIAH above are adjacent to the site, to the west, whereas the 3rd entry relates to the site itself. See Appendix 1 at Section 12.0 below for full NIAH records.

7.0 GROUNDS OF APPEAL

The 1st party appeal was submitted by HRA Planning on behalf of the applicant. The main grounds of this appeal can be summarised as follows.

7.1 NATURE OF THE PROPOSAL

- 7.1.1 The applicant is a body representing a collaborative arrangement of five religious congregations, and the purpose of the Educena Foundation is to preserve the Catholic ethos of the congregation schools, and to ensure that the properties, held in trust for the purposes of providing catholic education, would be securely and efficiently managed for this purpose.
- 7.1.2 The former school was amalgamated with 2 other schools, which moved to a new build school to the south of the town. The subject building has not been in use since 2013 and is surplus to educational requirements. The purpose of the application is to seek the 'orderly effective and safe management of the former school'. There is already evidence of some vandalism, and ongoing maintenance is incurring costs.
- 7.1.3 There is no doubt but that this is a unique development proposal given that only demolition is sought and not any secondary commercial development proposal of the site consequent to that demolition. The applicant has no development agenda for the site, and the application is not part of any preconceived development strategy.
- 7.1.4 For one year prior to making the application for demolition, the applicant had sought expressions of interest for an active use of the buildings. Despite some early interest, nothing materialised, due in some part to the size and complex arrangement of the building and its former education use, which does not lend easily to adaptation without significant investment. There is no evidence for the planning authority's contrary contention that there are viable alternative uses for the property.

7.2 PLANNING POLICY

- 7.2.1 The planning authority have misinterpreted their own policy by the incorrect suggestion that the school buildings are in some way protected structures, or have the same legal basis as protected structures, or are subject to the same policies as apply to protected structures. There is no evidence to suggest that the buildings were omitted from the RPS in error.
- 7.2.2 Policy EH031 – cited in the planning authority's reason for refusal – expressly applies to structures on the RPS, which is not applicable in this instance. As such, this is a misapplication of policy.

- 7.2.3 With reference to Policy EH037 – also cited in the planning authority’s reason for refusal - the site is not subject to an Architectural Conservation Area, and does not form a special characteristic feature of any special streetscape.
- 7.2.4 The removal of the buildings would present future opportunities to provide serviced lands for the sustainable development of the village.

7.3 ARCHITECTURAL MERIT AND HERITAGE

- 7.3.1 The school does not contain any parts that are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest.
- 7.3.2 No works are proposed to the existing 2m high limestone boundary wall that runs along the roadside boundary, other than to facilitate demotion access. It would be replaced in situ upon completion of demolition.
- 7.3.3 The proposed development does not interfere with the physical fabric or architectural heritage setting of the Convent building, which is a protected structure.
- 7.3.4 Refers to the architectural, heritage, and cultural impact assessment report, prepared by Judith Hill, which was submitted with the application. This report found that the buildings on site area not of conservation interest worthy of retention and protection. They are of negligible merit and do not contribute to the streetscape.
- 7.3.5 There is no conservation basis to suggest that Buildings 1 and 2 (as suggested by the DoAHG) should be retained.
- 7.3.6 A series of photographs accompanies the appeal.

8.0 SUMMARY OF RESPONSES

8.1 PLANNING AUTHORITY

- 8.1.1 The planning authority have not responded to the matters raised in the appeal.

9.0 ASSESSMENT

Having inspected the site and reviewed the file documents, I consider that the issues raised by this appeal can be assessed under the following broad headings:

- Comparative analysis
- Principle of development - context
- Heritage and architectural merit
- Conclusion on principle of development
- Residential amenity
- Screening for Appropriate Assessment

9.1 **COMPARATIVE ANALYSIS**

9.1.1 It is acknowledged by all parties to the appeal that this is an unusual application by virtue of it proposing demolition without any subsequent construction element. While it is unusual, it is however nonetheless valid, and must be assessed on its merits.

9.1.2 While the circumstances of this case are rare, they are not unprecedented. I have performed a search of the board's database and have found 9 previous appeal cases which consisted solely of demolition - without any construction - between 2006 and 2016. While the subject case must be assessed solely on its merits, it is nonetheless informative to have sight of these cases, and any patterns that might arise, before considering the subject appeal. The 9 examples can be summarised as follows.

Ref No. / address	Proposal	Decision and notes	Heritage an impediment to grant?	Lack of construction plans an impediment to grant?
<u>220239</u> 12 Upper Main Street, Rush, Co Dublin.	Demolition of existing house.	Refuse due to demolition of vernacular house. Unoccupied. Neglect and vandalism	Yes	

Ref No. / address	Proposal	Decision and notes	Heritage an impediment to grant?	Lack of construction plans an impediment to grant?
<u>225358</u> Mallow Town Centre, in the Townland of Annabella, Mallow.	Phased demolition of buildings	Grant	buildings have no significant aesthetic or conservation value.	3rd parties argued that the permission is premature pending permission for replacement buildings, strongly implied within the applicant's response that it is their intention to develop the land for mixed-use town centre type uses
<u>233189</u> Whitechurch Road, Rathfarnham, Dublin 16.	Demolish House	Refuse due to Policy H15 of CDP re demolition of habitable houses.	Not a protected structure or ACA. Repairs would be necessary to make habitable.	
<u>234743</u> Montgomery Street/ Barrow Track, Carlow.	Demolition of the former Celtic Linen Laundry buildings.	Grant Vandalism evident Industrial use is incompatible with res zoning	Not a building of architectural merit	

Ref No. / address	Proposal	Decision and notes	Heritage an impediment to grant?	Lack of construction plans an impediment to grant?
<u>235720</u> Clonea - Power, Co. Waterford.	Demolition of 3 buildings, entered on the register of protected structures and demolition of uninhabited structure.	Refuse due to part of historic streetscape. Protected structures and no exceptional circumstances.	Are protected structures	
<u>237654</u> Gate Lodge, Woodlands, Clonshaugh, Dublin 17.	Protected structure - Demolition of a gate lodge	Grant. Vandalism evident	Is in effect a ruin, just 4 walls. Not a PS in itself. No visual link to PS The Board did not consider that the gate lodge remains an intrinsic element of the PS	
<u>242522</u> 'Anna Villa', Oliver Plunkett Road, Ballymore Eustace,	Retention of the demolition of a previous structure	Refuse as structure is on NIAH of regional importance. Also due to CDP re vernacular architecture	Not a PS. Is on NIAH.	Concurrent appeal for 8 houses.

Ref No. / address	Proposal	Decision and notes	Heritage an impediment to grant?	Lack of construction plans an impediment to grant?
<u>242589</u> Glasha, Dromahane, Mallow, Co. Cork.	Demolition of a single storey house and associated site works.	Grant Cleared site would be used in conjunction with the commercial use on site (shop)		Inspector – a more comprehensive proposal would facilitate a more integrated approach to development within the village boundary but the applicant is entitled to make a stand-alone application.
<u>243109</u> Former Chivers Facility, Coolock Drive, Dublin 17.	Demolition of factory buildings.	Grant		has been vacant for some time and whilst the future development of the site is not currently known, it is intended to sell the site as soon as possible.

Table 2

9.1.3 As can be seen from the last and second last columns of the table above, there are 2 aspects that I sought to draw out of each case, namely whether heritage issues were brought to bear on the case, and whether the absence of any construction proposals arose as an issue. On these two points, a number of conclusions can be drawn from the batch of 9.

9.1.4 Firstly, in all 3 cases where heritage was raised as a concern (220239, 235720, 242522), there was a refusal of permission by the board for –inter alia – this reason. In one case, protected structures

were involved, in a second, the building was on the NIAH, and in the third, it was merely a vernacular house.

9.1.5 In the case of the 5 grants of permission, it was explicitly determined in 3 of the cases that the buildings were not of architectural or heritage merit. I note that in the case of 237654, the structure in question was a gate lodge of a protected structure, but that in this instance, the board explicitly determined that it was not an intrinsic element of the protected structure.

9.1.6 On the issue of the lack of plans to redevelop the sites, this was raised in at least 4 of the cases. While it was often remarked upon as unusual, with a preference expressed for a comprehensive set of plans, it was not in itself considered an impediment to a favourable consideration of the application.

9.2 PRINCIPLE OF DEVELOPMENT – CONTEXT

9.2.1 In my opinion, the assessment framework for this case can be broken down into 2 broad questions.

1 Is it appropriate to ‘break down’ the redevelopment of the site into a stand-alone application for demolition, (possibly) followed by an application for permission for some future scheme?

9.2.2 If the answer to this question is no, then permission must be refused. However, I cannot see any reasonable argument that would support such a conclusion. The applicant is within their rights to make the application, and there is clear precedent for the board considering such cases. In my opinion, the ‘breaking up’ of the potential redevelopment of this site is legitimate, and the answer to this question is yes.

2 Is the proposal to demolish existing buildings acceptable in and of itself?

9.2.3 This question in my view depends on matters specific to the case itself. There is no blanket presumption towards either a grant or a refusal on this issue. As can be seen from the comparative analysis, in cases where the site contains buildings of little or no architectural merit, there is generally only passing consideration given to this question. In cases where the buildings are of architectural merit, this forms the crux of the assessment.

9.2.4 In my opinion, the principle of development hangs on the question of the architectural and heritage merits of the buildings on site for which demolition is sought.

9.3 HERITAGE AND ARCHITECTURAL MERIT

- 9.3.1 There is a wealth of information available to the board on this issue. The report from Judith Hill, submitted by the applicant with the application presents a large amount of background information, along with a reasoned argument for the buildings' demolition.
- 9.3.2 I also refer the board to Appendix 1 of my report, which contains the relevant extracts from the National Inventory of Architectural Heritage. Section 12.3 refers to the School itself.
- 9.3.3 Opposing the applicant's position on architectural merit and heritage are the reports from the Conservation Officer (2), Planning Officer (2), and the submissions from An Taisce and the Department of Arts, Heritage and the Gaeltacht. While distinctions could be drawn between the various positions of these contributions, it could reasonably be said that all are broadly opposed to the demolition of the school buildings on grounds of heritage.
- 9.3.4 In my opinion, there is sufficient information on file to conclude that these buildings – or at least the main buildings – are of significant architectural merit and heritage value. While the form and features of this building, including religious motifs, terrazzo flooring, period fittings etc., could reasonably be considered somewhat ubiquitous among the country's building stock of educational and institutional buildings of the late 19th and early 20th century, the building does none the less represent an element of some significance in a local context, as reflected in its inclusion in the National Inventory of Architectural Heritage.
- 9.3.5 As such, I consider that the demolition of this building, in and of itself, would be inconstant with the proper planning and development of the area from first principles.
- 9.3.6 I note the appellants' grounds regarding the alleged misuse of the policies of the County Development Plan, and I concur with the specifics of the appeal on this issue. Objective EH 031, referred to in the refusal reason, does specifically reference buildings contained on the RPS, notwithstanding that it is titled 'General Protection of Structures'. However, I consider that the second policy cited, namely EH 037 (see Section 6.1.1 above) affords sufficient context for the planning authority to have come to their decision, and indeed for the board to come to the same decision.

9.4 CONCLUSION ON PRINCIPLE OF DEVELOPMENT

- 9.4.1 On the basis of my framing of the question under Section 9.2 above, the principle of demolition of the buildings in this instance can only be accepted if the loss of the buildings can be justified on grounds of architectural merit and heritage. In my opinion, this test has not been

satisfied, the buildings are of merit, and the principle of development is not acceptable.

- 9.4.2 It could reasonably be said that buildings of a value comparable to those on the subject site have been demolished in the past in the context of proposals for comprehensive redevelopment. However, this is not the nature of the proposal currently before the board.

9.5 RESIDENTIAL AMENITY

- 9.5.1 I note that the site is proximate to a number of dwellings, and that there is 3rd party access through the lands along the eastern perimeter. In the context of a grant of permission for works on this site, I consider that such matters could reasonably be addressed by way of condition.

9.6 SCREENING FOR APPROPRIATE ASSESSMENT

- 9.6.1 The nearest Natura 2000 site is the Lower River Shannon SAC, around 2.2km northwest and 1.8km southwest of the site. Given the minor nature of the proposed development, I do not consider that the proposed development would be likely to have any significant effects on the integrity of a European site having regard to its conservation objectives.

10.0 CONCLUSION AND RECOMMENDATION

Based on the above, I recommend that permission be refused as per the planning authority's decision, but omitting reference to Objective EH O31, which is not applicable in this instance.

11.0 REASONS AND CONSIDERATIONS

1. The development, if permitted, would damage the integrity of the evolved historic streetscape and be detrimental to the architectural heritage and social history of the area and would materially contravene Objective EH 037: General Protection of Architectural Streetscapes as set out in the Limerick County Development Plan 2010-2016. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

G. Ryan
Planning Inspector
12th February 2016

12.0 Appendix 1 – National Inventory of Architectural Heritage records

Retrieved from <http://www.buildingsofireland.ie/Surveys/Buildings/> 11th
February 2016

12.1 SISTERS OF MERCY CONVENT, MAIN STREET, DOON, COUNTY LIMERICK

Reg. No.	21809006
Date	1860 - 1880
Previous Name	N/A
Townland	LISGAUGH
County	Limerick
Coordinates	183462, 150269
Categories of Special Interest	ARCHITECTURAL SOCIAL
Rating	Regional
Original Use	country house
In Use As	convent/nunnery

Description

Detached ten-bay three-storey H-plan convent, built c. 1865, comprising three-bay single-storey porch and projecting end bays to front (south) elevation, return to rear, seven-bay three-storey extension with gable-fronted porch to west and chapel addition to east elevation. Hipped slate roof having render bracketed eaves course, rendered chimneystacks and cast-iron rainwater goods. Lined-and-ruled rendered walls with render quoins and plinth course. Render parapet to porch having cross finial. Square-headed openings with limestone sills, some having one-over-one pane timber sliding sash windows, some with replacement uPVC windows. Square-headed tripartite openings to end bays having render entablatures, limestone sills, some with one-over-one pane timber sliding sash windows, some having replacement uPVC windows. Round-headed openings to east end bay ground floor with render hood mouldings, concrete sills and stained glass windows. Round-headed openings to porch having render Doric style pilasters, architrave to centre opening and render hood mouldings with keystones over six-over-six pane timber sliding sash window and flanking three-over-two pane timber sliding margin sash windows. Round-headed openings to porch, east elevation having flanking render Doric style pilasters, hood mouldings with keystone one fanlight over timber panelled door. Porch to west extension comprising render architrave and cross finial. Render Doric style pilasters flanking round-headed opening having render hood moulding and replacement uPVC window. Square-headed opening to porch, north elevation with glazed overlight over double-leaf timber panelled doors. Lined-and-ruled rendered boundary walls to rear.

Appraisal

This substantial convent, which may incorporate fabric of an earlier structure Doon House, has been extended and added to over the years, following the

establishment of the convent in 1865. The building retains much of its imposing form, including salient features such as the sash windows and slate roof, which help conserve its original character. Features such as the subtly diminishing windows enliven the elevations, whilst the render details add decorative relief to the façade. The convent forms part of a group of related structures with the school to the east.

12.2 CHAPEL OF REPARATION TO THE SACRED HEART OF JESUS, DOON, COUNTY LIMERICK

Reg. No.	21809007
Date	1870 - 1890
Previous Name	N/A
Townland	LISGAUGH
County	County Limerick
Coordinates	183497, 150263
Categories of Special Interest	ARCHITECTURAL ARTISTIC SOCIAL
Rating	Regional
Original Use	church/chapel
In Use As	church/chapel

Description

Attached gable-fronted convent chapel, built in 1883, comprising porch to front (east) elevation, four-bay nave, gable-fronted transept to south, single-bay single-storey extension to north and gable-fronted chancel to rear (west) elevation. Pitched slate roof with render cross finials, cast-iron rainwater goods and roof light to transept. Rendered walls having render plinth course and Doric style pilasters supporting continuous frieze. Broken render pediment to front elevation, render pediments to chancel and transept. Decorative render panel and freestanding statue to front elevation. Round-headed niche to south elevation with render hood moulding, freestanding statue and render plinth. Round-headed openings having render hood mouldings with scrolled consoles and stained glass windows having painted stone sills. Square-headed openings to porch with stained glass windows and continuous concrete sill. Square-headed openings to porch, north and south elevations having double-leaf timber panelled doors. Concrete steps to entrances. Barrel-vaulted roof to interior. Timber gallery to east. Timber pedimented porch to north with round-headed opening having quarry glazed overlight over double-leaf timber panelled doors with round-headed stained glass panels. Round-headed arcades to chancel having marble columns with Corinthian style render capitals.

Appraisal

This convent chapel is an interesting example of late nineteenth-century ecclesiastical architecture. Clearly influenced by neo-classicism, the design departs from the Gothic Revival style favoured for such structures, as can be seen in the Doric style pilasters and robust pediments. The interior is particularly ornate having rich render ornamentation and decorative features such as the arcade with well composed marble Corinthian columns. The

chapel forms part of a group of related structures, including the convent and national school. Plaque to front has date of '1883'.

12.3 SISTERS OF MERCY NATIONAL SCHOOL, DOON, COUNTY LIMERICK

Reg. No.	21809005
Date	1890 - 1900
Previous Name	N/A
Townland	LISGAUGH
County	County Limerick
Coordinates	183553, 150243
Categories of Special Interest	ARCHITECTURAL ARTISTIC SOCIAL
Rating	Local
Original Use	school
In Use As	school

Description

Detached eleven-bay two-storey over basement H-plan school, built in 1896. Comprising gable-fronted single-bay two-storey projecting bay and gablet to front (east) elevation, gablet and seven-bay three-storey addition to rear (west) elevation with adjoining gable-fronted single-bay two-storey block to west. Porch to west addition, south elevation. Multiple-bay four-storey extension to south elevation. Pitched slate roofs having cast-iron rainwater goods, render copings with cast-iron finials, render eaves course and rendered chimneystacks. Roughcast rendered walls having render plinth course. Rendered walls to west addition with stringcourses. Rendered walls to west block. Inscribed limestone date plaque to north elevation. Round-headed niche to gablets with render surrounds, statues and sills. Square-headed openings having limestone sills and replacement uPVC windows throughout. Round-headed window opening to gablet. Paired round-headed openings to projecting bay, first floor with shared limestone sill and render hood moulding having blind roundel motif. Venetian style windows to north elevation and west block, north and south elevations, with render hood mouldings, concrete shared sills and round-headed window openings having flanking square-headed windows. Oculus to north elevation with stained glass window. Oculi to west block, north and south elevations having render surrounds and fixed windows. Round-headed opening to front elevation with fluted render surround and fanlight over timber panelled door. Flight of concrete steps having render balustrades to entrance. Camber-headed opening to projecting bay, front elevation with render surround and glazed overlight over timber battened door. Flight of concrete steps having metal balustrades to entrance. Square-headed opening to south extension and rear elevation with glazed overlights over double-leaf timber panelled doors and cantilevered canopies over. Rubble limestone walls to north having rendered elliptical-headed carriage arch. Pair of square-profile dressed limestone piers with double-leaf wrought-iron gates to north.

Appraisal

This school, established by the Sisters of Mercy in 1896 as a national school and boarding school, retains much of its original character despite various additions and alterations. Its long, tall massing retains features that are typical of such structures including the gables and gable-fronted bays. The school forms a group of related structures with the convent complex to the west.