



An  
Bord  
Pleanála

## Inspector's Report ABP-303903-19

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<b>Development</b>	PROTECTED STRUCTURE: Remove timber framed glazed internal lobby doors and screens and replace with hardwood timber framed glazed doors and screens in new configuration.
<b>Location</b>	An Post, 19-24, St. Andrew's Street, Dublin, D02 C966
<b>Planning Authority</b>	Dublin City Council South
<b>Planning Authority Reg. Ref.</b>	4576/18
<b>Applicant(s)</b>	An Post GPO
<b>Type of Application</b>	Permission
<b>Planning Authority Decision</b>	Refuse
<b>Type of Appeal</b>	First Party
<b>Appellant(s)</b>	An Post GPO
<b>Observer(s)</b>	TII
<b>Date of Site Inspection</b>	28 <sup>th</sup> May 2019
<b>Inspector</b>	Colin McBride

## **1.0 Site Location and Description**

- 1.1. The appeal site, which has a stated area of 0.0761 hectares, is located in Dublin City Centre on St. Andrew Street. The site is occupied by no. 19-24, which is a four-storey building with a post office premises at ground floor level and office use on the upper floors. The existing structure on site is on the record of protected structures and is located within an Architectural Conservation Area.

## **2.0 Proposed Development**

- 2.1. Permission for the removal of existing timber framed glazed internal lobby doors and screens sited inside the front entrance and replacement with new hardwood timber framed glazed doors and screens in new configuration to allow enhanced automatic security screening installation. The existing structure is a protected structure.

## **3.0 Planning Authority Decision**

### **3.1. Decision**

Permission refused based on one reason...

1. The proposed works would represent a loss of significant historic fabric and the installation of an inferior lobby arrangement, all of which would permanently, negatively and adversely impact the architectural character of the Protected Structure. The proposed works would therefore be contrary to Policy CHC2 of the Dublin City Development Plan that aims to ensure that the special interest of protected structures is protected. The proposed development would set an undesirable precedent for similar such works to protected structures and would therefore be contrary to the proper planning and sustainable development of the Architectural Conservations Area.

### **3.2. Planning Authority Reports**

#### **3.2.1. Planning Reports**

Planning report (07/02/19): The proposal would entails the removal of historic fabric and it replacement with an inferior arrangement having an adverse impact on the protected structure. Refusal was recommended based on the reason outlined above.

### 3.2.2. Other Technical Reports

Drainage Division (09/01/19): No objection.

Conservation Officer (05/02/19): Refusal recommended on the basis of removal of historic fabric and it replacement with an inferior arrangement having and adverse impact on the protected structure.

### 3.3. **Prescribed Bodies**

None.

## 4.0 **Planning History**

4576/18: Permission granted for removal of existing windows and installation of an ATM machine.

1291/07: Permission refused for external banners. Refused on the basis of adverse visual impact and adverse impact on character and setting of a protected structure.

## 5.0 **Policy and Context**

### 5.1. **Development Plan**

The relevant Development Plan is the Dublin City Development Plan 2016-2022.

The site is zoned Z5 with a stated objective 'to consolidate and facilitate development of the central area, and to identify, reinforce and strengthen and protect its civic design character and dignity'.

CHC2: To ensure that the special interest of protected structures is protected.

Development will conserve and enhance Protected Structures and their curtilage and will:

(a) Protect or, where appropriate, restore form, features and fabric which contribute to the special interest

(b) Incorporate high standards of craftsmanship and relate sensitively to the scale, proportions, design, period and architectural detail of the original building, using traditional materials in most circumstances

(c) Be highly sensitive to the historic fabric and special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials

(d) Not cause harm to the curtilage of the structure; therefore, the design, form, scale, height, proportions, siting and materials of new development should relate to and complement the special character of the protected structure

(e) Protect architectural items of interest from damage or theft while buildings are empty or during course of works

(f) Have regard to ecological considerations for example, protection of species such as bats. Changes of use of protected structures, which will have no detrimental impact on the special interest and are compatible with their future long-term conservation, will be promoted.

CHC4: To protect the special interest and character of all Dublin's Conservation Areas. Development within or affecting a conservation area must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.

Enhancement opportunities may include:

1. Replacement or improvement of any building, feature or element which detracts from the character of the area or its setting
2. Re-instatement of missing architectural detail or other important features
3. Improvement of open spaces and the wider public realm, and re-instatement of historic routes and characteristic plot patterns
4. Contemporary architecture of exceptional design quality, which is in harmony with the Conservation Area
5. The repair and retention of shop- and pub-fronts of architectural interest

## 5.2. **Natural Heritage Designations**

None in the vicinity.

## 6.0 **The Appeal**

### 6.1. **Grounds of Appeal**

A first party appeal has been lodged by MacCabe Durney Barnes on behalf of the applicant An Post GPO. The grounds of appeal are as follows...

- The proposal does not alter the external appearance of the protected structure.
- The new lobby and doors use the same hardwood and use the existing brass fittings from the existing doors. The door is placed centrally to maintain design integrity.
- The works proposed are not visible externally and are not visible internally from the main post office space.
- The proposal alterations are driven by security concerns and needs.
- The applicants own several protected structures and take such responsibility seriously in terms of proposing alterations.

- A Conservation Report submitted with the application noting the proposed works as being neutral, slight and medium term. Such are also reversible in accordance with the Architectural Heritage Guidelines (Section 7.12).
- In relation to precedent it is noted that such should be considered on its merits and that the same security arrangements area in several financial institutions in the vicinity.

## 6.2. Planning Authority Response

No response.

## 6.3. Observations

An observation has been submitted by Transport Infrastructure Ireland (TII).

- The development falls within the area to which the Section 49 Luas Cross City Contribution Scheme applies. If the development does not fall within the exemptions listed in the scheme, then a Section 49 Contribution should be applied in the event of a grant of permission.

## 7.0 Assessment

- 7.1. The main issues in this appeal are those raised in the grounds of appeal and I am satisfied that no other substantive issues arise. The issue of appropriate assessment also needs to be addressed. The issues can be dealt with under the following headings:

Protected structure/conservation

Appropriate Assessment

- 7.2. Protected structure/conservation:

- 7.2.1 The proposal entails the removal of existing timber framed glazed internal lobby doors and screens sited inside the front entrance and replacement with new hardwood timber framed glazed doors and screens in a new configuration to allow

enhanced automatic security screening installation in a protected structure. Permission has been refused on the basis it would represent a loss of significant historic fabric and the installation of an inferior lobby arrangement, impacting adversely on the architectural character of a Protected Structure. The proposal was deemed to be contrary Policy CHC2 of the City Development Plan.

7.2.2 The applicants/appellants note that the proposal is required to improve security arrangements. It is noted that the alteration would have no significant or adverse impact on the setting and character of the protected structure and use materials similar to the existing doors as well as reusing door handles and brass fittings. Firstly I would note that the alterations proposed do not impact the external appearance of the existing structure with the existing wooden doors being retained and the alterations being internal. The proposal entails replacing the existing doors and hardwood framed glazed panels each side of the entrance lobby with new hardwood framed glazed panels and security doors. The panels are to use similar materials to the existing panels and doors with brass fittings including reuse of existing handles proposed. I am satisfied that the applicants are taking into account the status of the existing structure in terms of the use/reuse of materials. I would consider that the changes proposed do take into account the character and period of the existing structure.

7.2.3 The proposal does entail loss of existing doors and glazed panels that appear to be original to the structure. At the time of the site visit I would note that the one side of the ground floor area is closed and appears to be undergoing works whereas the other side does not have too many original features internally apart from the ceiling structure. The existing doors are one of the original features that are still intact internally on the ground floor and they do contribute significantly to the character of the existing protected structure. I would acknowledge that the reason for the proposed works is to improve security, but would question whether adequate justification has been provided for the wholesale removal of the original doors and framework. I would question whether the security arrangements on site can be improved while retaining the doors and framework and whether such options have been adequately explored.

7.2.4 I would consider that the proposed works would represent a loss of significant historic fabric and a set of original doors and framework that contribute significantly to the character of the existing structure. The applicant has failed to demonstrate adequate justification for the removal of such or that the existing doors and framework cannot be incorporated into any future security improvements. The proposal would permanently, negatively and adversely impact the architectural character of the Protected Structure. The proposed works would therefore be contrary to Policy CHC2 of the Dublin City Development Plan that aims to ensure that the special interest of protected structures is protected. The proposed development would set an undesirable precedent for similar such works to protected structures and would therefore be contrary to the proper planning and sustainable development of the Architectural Conservations Area.

7.3 Appropriate Assessment:

7.3.1 Having regard to the nature and scale of the proposed development and its proximity to the nearest European site, no Appropriate Assessment issues arise and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

## 8.0 Recommendation

8.1. I recommend refusal based on the following reason:

## 9.0 Reasons and Considerations

1. The proposed works would represent a loss of significant historic fabric and a set of original doors and framework that contribute significantly to the character of the existing structure. The applicant has failed to demonstrate adequate justification for the removal of such or that the existing doors and framework cannot be incorporated into any future security improvement, all of which would permanently. The proposal would permanently, negatively and adversely impact the architectural character of the Protected Structure. The proposed works would therefore be contrary to Policy CHC2 of the Dublin City Development Plan that aims to ensure that the special



interest of protected structures is protected. The proposed development would set an undesirable precedent for similar such works to protected structures and would therefore be contrary to the proper planning and sustainable development of the Architectural Conservations Area.

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Colin McBride  
Planning Inspector

29<sup>th</sup> May 2019