



An  
Bord  
Pleanála

## Inspector's Report

### ABP-308189-20

<b>Development</b>	Retention permission for the removal of non-original stud partition walls, kitchenettes and bathroom and permission for internal/external alterations including a reduction in number of apartments from 10 to 9, as well as installation of upgraded services.
<b>Location</b>	97, North Circular Road, Dublin 7
<b>Planning Authority</b>	Dublin City Council
<b>Planning Authority Reg. Ref.</b>	2926/20
<b>Applicant(s)</b>	Savareen Limited
<b>Type of Application</b>	Permission
<b>Planning Authority Decision</b>	Refuse
<b>Type of Appeal</b>	First Party vs. Refusal
<b>Appellant(s)</b>	Savareen Limited
<b>Observer(s)</b>	None
<b>Date of Site Inspection</b>	8 <sup>th</sup> December 2020
<b>Inspector</b>	Stephen Ward

## 1.0 Site Location and Description

- 1.1. The site is located along North Circular Road, approximately 1.5 km northwest of the city centre. Part of a terrace of four similar units, it contains a two-storey over raised basement residential property which accommodates a number of separate apartments. All four properties within the terrace are Protected Structures in accordance with the Dublin City Development Plan 2016-2022.
- 1.2. This red-brick terrace shares a pitched M-profile slate roof and each property has a paired three-storey return to the rear. There is a long garden to the rear of no. 97 which bounds onto a storage structure on St. David's Terrace. As recognised in the National Inventory of Architectural Heritage, the use of paired entrances with elevated shared platforms to the front gives a grand scale to the terrace, as does the use of quoins to each pair.

## 2.0 Proposed Development

- 2.1. Retention permission is sought for the removal of non-original stud partition walls, kitchenettes and bathroom ware. Permission is sought for:
  - Reconfiguration of walls to accommodate kitchenettes and bathrooms in each apartment;
  - A reduction in the number of apartments from 10 to 9;
  - Alterations to existing fire-protection measures;
  - Installation of upgraded services;
  - Repair and restoration of original features;
  - Replacement of all non-original windows with one over one double glazed sash windows;
  - All associated siteworks and services.
- 2.2. The development does not result in any change to the footprint or floor area of the building. The supporting documentation states that the development will be used for the provision of emergency accommodation for homeless people in Dublin.

## 3.0 Planning Authority Decision

### 3.1. Decision

3.1.1 By order dated 19<sup>th</sup> August 2020, Dublin City Council issued notification of the decision to refuse permission. The reason for refusal was as follows:

*The proposed quantum of relocated en-suites and kitchens would result in a significant further loss of historic fabric within historic rooms which retain a significant amount of original material including original joinery and decorative plaster and which have already been compromised by the introduction of unsympathetic en-suites and kitchen facilities. The proposal would result in an overly intense use of this Protected Structure, which would have a detrimental impact on its special interest and is considered to be incompatible with its future long-term conservation. The proposal, would therefore, would (sic) set an undesirable precedent, materially affect a protected structure, cause serious injury to the historic fabric and architectural character of the Protected Structure contravening Section 11.1.5.1 CHC2 of the Dublin City Council Development Plan 2016-2022.*

### 3.2. Planning Authority Reports

#### 3.2.1. Planning Reports

In summary, the DCC planner's report states that:

- It is accepted that the previous layout did not comply with standards and reconfiguration and refurbishment is required.
- While it is acknowledged that residential standards on room areas and dimensions do not apply to refurbishments, concerns are raised about the standard of residential amenity.
- Limited information has been submitted on the stated use for emergency homeless accommodation and it is queried whether permission for a material change of use of the property would be required in that case.
- The provision of kitchen and bathroom facilities in each room would create significant impacts on their form and legibility.

- The Conservation Office has raised significant concerns (see below).
- A refusal is recommended in accordance with the terms of the DCC decision.

### 3.2.2. Other Technical Reports

**Drainage Division:** No objections subject to conditions.

The **Archaeology, Conservation and Heritage** report outlines that:

- It would be more appropriate to provide high-quality long-term accommodation as the facilities / services required to support this temporary use can cause serious injury to the fabric and character of the building.
- A revised proposal, with 1 apartment per floor, would be more acceptable.
- While the proposed design is a significant improvement on the previous version, concerns remain that the requirement for significant ventilation ductwork, water supply and drainage routes for each unit may cause serious injury to historic fabric.
- The applicant owns two other Protected Structures on this road and has indicated almost identical proposals for these buildings. There are concerns regarding the cumulative impact of insensitive proposals on the wider locality.
- A refusal is recommended in accordance with the terms of the DCC decision.

### 3.3. Prescribed Bodies

None.

### 3.4. Third Party Observations

None.

## 4.0 Planning History

The following planning history applies to the subject site:

**P.A. Ref E1111/18:** An Enforcement Notice was issued on 19<sup>th</sup> December 2018 regarding unauthorised works to this Protected Structure.

**P.A. Ref. 0090/19:** A section 5 declaration was sought on renovation and refurbishment works similar to those currently proposed. DCC did not consider the works to be exempted development.

**P.A. Ref. 2732/19:** Retention permission and permission refused for a development similar to that currently proposed, albeit with a different layout involving the retention of all 10 existing units. The reason for refusal was similar to the current appeal case.

## 5.0 Policy Context

### 5.1. National Policy

5.1.1 **'Architectural Heritage Protection: Guidelines for Planning Authorities'** (2011) provides guidance to planning authorities in assessing applications involving Protected Structures. Chapter 6 outlines that the best way to prolong the life of a protected structure is to keep it in active use, ideally in its original use. Where this is not possible, there is a need to balance the building's continuing economic viability with the effect on the character and special interest of its fabric.

5.1.2 Section 7.3 outlines the conservation principles for examining proposals, which can be summarised as follows:

- Keeping a building in use while protecting its special interest
- Researching the structure and using expert conservation advice
- Promoting minimum intervention by ensuring that any permitted works are necessary for repair or to perform a new / enhanced function
- Promoting honest repair of authentic fabric rather than replacement
- Using appropriate materials and methods
- Ensuring reversibility of alterations
- Avoiding incremental damage to a Protected Structure or ACA'S by precedent
- Discouraging architectural salvage from other buildings
- Complying with the Building Regulations, including alternative approaches in order to protect the character of the building.

5.1.3 Chapter 11 outlines the importance of interiors, including the protection of the original plan form; floor structures of interest; internal walls and partitions; ceilings

with plaster decoration; finishes; joinery; fixtures and fittings. The introduction or alteration of services requires extremely careful consideration in advance to avoid unacceptable disruption to the interior.

5.1.4 Chapter 17 deals with fire safety and highlights the need for compromise to resolve conflicting requirements with architectural conservation. Fire safety solutions should impact as little as possible on important elements and fabric. There should be minimal intervention and alterations which impact on important fabric should be readily reversible.

5.1.5 The **National Planning Framework (NPF)** is the Government's high-level strategic plan for shaping the future growth and development of the country to the year 2040. A key element of the NPF is a commitment towards 'compact growth', which focuses on a more efficient use of land and resources through reusing previously developed or under-utilised land and buildings.

5.1.6 **Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018)** sets out the design parameters for apartments including locational consideration; apartment mix; internal dimensions and space; aspect; circulation; external amenity space; and car parking.

## 5.2. Development Plan

5.2.1. The operative plan is the Dublin City Development Plan 2016-2022. The appeal site is zoned as 'Z2 – Residential Neighbourhoods (Conservation Areas)', within which the stated objective is '*To protect and/or improve the amenities of residential conservation areas*', and residential uses are deemed 'permissible'.

5.2.2 Section 14.8.2 of the plan states that residential conservation areas have extensive groupings of buildings and open spaces with an attractive quality of architectural design and scale. The general objective is to protect such areas from unsuitable development or works that would have a negative impact on its amenity or architectural quality.

5.2.3 The property is also included on the Record of Protected Structures (No. 1613), the purpose of which is to manage and control future changes so that significant historic character is retained.

5.2.4 Relevant heritage policies can be summarised as follows:

**CHC1** seeks to preserve the built heritage of the city.

**CHC2** protects the special interests of protected structures.

**CHC4** protects the special interest and character of all Dublin's Conservation Areas and states that development must contribute positively to their function and character.

### 5.3. **Natural Heritage Designations**

There are no designated sites in proximity to the appeal site.

## 6.0 **The Appeal**

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

The decision of DCC to refuse permission has been appealed by the applicant. In summary, the grounds of appeal are as follows:

- A room-by-room analysis generally outlines that the existing and proposed demolition / removal works involve non-original features which already detract from the historic fabric of the building.
- The proposed new partitions will not run to ceiling height, thereby protecting ceilings and cornices.
- The removal of non-original works will make the building more legible and will improve the architectural quality of the interiors significantly.
- New services throughout the building have been carefully considered to avoid damaging historic fabric.
- To the exterior, all non-original windows and vents will be suitably replaced.
- It is submitted that the works will greatly improve the usability and amenity of each unit whilst protecting and restoring the original features. All works will be carried out in accordance with best conservation standards and practice.

- The question before the Board is whether it is better to reinstate the units to the previous condition, which compromised much of the historic fabric and residential amenity, or to improve and restore the house to its prior condition through conservation-led design as proposed by the appellant.
- The appeal suggests several precedent cases where similar works were either considered exempted development or granted permission.
- It is argued that the property is already sub-divided, and the proposal will not result in an intensification of use.

## 6.2. **Planning Authority Response**

None.

## 6.3. **Observations**

None.

## 7.0 **Assessment**

7.1. Having inspected the site and examined the application details and all other documentation on file, and having regard to relevant local/national policies and guidance, I consider that the main issues in this appeal are as follows:

- The nature of the application
- The principle of the development
- Residential amenity
- Architectural heritage

## 7.2. **The nature of the application**

7.2.1 Although the applicant has not applied for permission for a change of use, the planning authority has raised the question of a material change of use in light of the stated intentions to use the property for emergency homeless accommodation. I consider it appropriate to clarify this issue at the outset.



- 7.2.2 Apart from brief references to the future use of the building for emergency homeless accommodation, neither the application nor the appeal contains any supporting information in this regard. There is no evidence of a housing or homeless agency involvement, and there are no details of the envisaged operation and management of any such facility. However, the floor plans do include some element of communal facilities such as a laundry room and linen store. Most notably a meeting room is proposed on the first floor, which could facilitate management / care facilities associated with an emergency homeless accommodation service.
- 7.2.3 On the question of the change of use from the established use of the property (i.e. bedsits / apartments) to emergency homeless accommodation, I have reviewed 'section 5' referral cases to the Board. A recent relevant case (307064-20) has determined that a homeless hostel comes under Class 9, Part 4 of Schedule 2 of the Planning and Development Regulations 2001 (as amended), i.e. '*the provision of residential accommodation and care to people in need of care (but not the use of a house for that purpose)*'. Furthermore, I consider that, amongst other questions, case reference number PL86.RL.3032 (2013) determined that the change of use of a property from multiple bedsit / apartment use to '*temporary accommodation for homeless persons*' constitutes a material change of use, which is development and is not exempted development.
- 7.2.4 Having regard to the above and the relevant legislation, I am of the opinion that the change of the established use of the appeal property (i.e. residential bedsits/apartments) to emergency homeless accommodation would be a material change of use that would require permission. I note that the appeal has not specifically examined this question but does address a separate question regarding intensification of existing use.
- 7.2.5 Ultimately, I consider that the application does not presently propose a change of use, as is evidenced by the absence of any such reference in the public notices, the application form and the application fees paid. While the supporting documentation does include brief references to use as emergency homeless accommodation, I consider that this should be treated only as a suggested future use and that the Board should not consider this as part of the current application. Any such use could be the subject of a separate application for change of use and, in the event of a

grant of the current application, a suitable condition could be attached to clarify that it does not authorise a material change of use.

7.2.6 The assessment of the application should, therefore, be limited to the impact of the alterations to the existing residential units. Given that there is a reduction in the number of units from ten to nine, I do not consider that the question of intensification of the existing use arises.

### **7.3 The principle of the development**

7.3.1 Having clarified my position on the nature of the application, the question of the principle of the development is limited to the proposal to alter and reconfigure the existing residential units.

7.3.2 I acknowledge the position of the planning authority in this regard, which raises concern about intensity of use. The report from the Architectural Conservation Officer outlines a general preference for the return to original use (i.e. single-family use) and includes an opinion that a maximum of one unit per floor (i.e. 3 apartments) could be considered acceptable.

7.3.3 In terms of national policy, the 'Architectural Heritage Protection' guidelines highlight the importance of keeping a building in active use, ideally in its original use. The guidelines also acknowledge the need to balance the building's continuing economic viability with the effect on the character and special interest of its fabric.

7.3.4 While the aspirations of local and national policy are certainly well-placed, I consider that the established use and intensity of the property must be given due consideration. The application documentation outlines that, prior to the commencement of recent works, the property comprised ten separate pre-1963 residential units. Although the planning authority has taken enforcement action regarding the recent demolition/removal works, the subdivision of the property does not appear have been raised. In the absence of any indication to the contrary, it can, therefore, be reasonably assumed that the existing units are authorised and long-established based on a pre-1963 status.

7.3.5 Having regard to the above, and whilst acknowledging the merits of returning the property to its original use, I consider that the proposal to alter the existing residential units, including the reduced intensity from 10 to 9 units, must be considered on its

merits. The proposal, in principle, would be consistent with the zoning objective for the site, which seeks to protect and/or improve the amenities of residential conservation areas. Accordingly, I have no objection in principle to the development, subject to further assessment in relation to impacts on residential amenity and architectural heritage.

#### 7.4 Residential amenity

7.4.1 In terms of apartment sizes, I note that the proposed units do not involve any significant changes to overall floor areas. The smallest of the existing units (room no. 2.01 at 13.7 sq.m.) is to be removed and this is considered a positive proposal. The proposed unit areas will therefore range from 20.4 sq.m. to 28 sq.m. and are designed based on studio type apartments with a combined living/sleeping area generally provided for a single person.

7.4.2 The provisions regarding studio accommodation have been updated in the 2018 'Design Standards for New Apartments' to reflect the potential that this type of dwelling has to contribute to meeting housing need, with the minimum studio apartment floor area now being 37 sq.m.

7.4.3 Having regard to the above, a comparison of the existing and proposed apartments sizes with the 'Design Standards for New Apartments' is as follows:

Unit Number	Existing Area (sq.m.)	Proposed Area (sq.m.)	Minimum Area (sq.m.)
RM.0.02	26	26	37
RM.0.03	23	23	37
RM.0.04	31.5	28	37
RM.1.02	26.3	26.3	37
RM.1.03	23.6	23.6	37
RM.1.04	20	20.4	37
RM.2.02	22	22	37
RM.2.03	23.3	23.3	37
RM.2.04	20.8	20.9	37

7.4.4 Consistent with the limited overall unit floor areas, I also note that the proposed units do not meet the minimum standards for living / dining / kitchen areas, storage space and private amenity space.

7.4.5 However, it should be noted that section 1.11 of '*Design Standards for New Apartments*' states that the guidelines provide a 'target standard' where existing buildings are to be wholly or partly refurbished and throughout the guidelines there are provisions to allow the relaxation of standards for building refurbishment schemes on a case-by-case basis. Section 6.9 also requests that planning authorities practically and flexibly apply the general requirements of these guidelines in relation to refurbishment schemes, particularly in historic buildings, where property owners must work with existing building fabric and dimensions.

7.4.6 Having regard to the above, and whilst acknowledging that the proposed units do not meet the minimum standards set out in the guidelines, I consider that the proposal to refurbish these long-established units within a Protected Structure should be facilitated through the relaxation of standards. The proposed reconfiguration of the units would involve the removal of the smallest existing unit and would provide an improved layout with larger living/sleeping areas for the remaining units. The upgrading of services and fire safety measures would also significantly improve building standards. In conclusion I consider that the proposed development would result in a significant improvement in the level of residential amenity afforded to the existing units.

## 7.5 **Architectural Heritage**

7.5.1 The application is accompanied by a Conservation Impact Report prepared by a Grade II practice. In terms of the history and current condition of the building, the report sets out the following:

- Number 97 is part of a terrace of late Victorian buildings dating from the late 1870's and was historically used as a single unit townhouse.
- All original one-over-one timber sash windows have been replaced with aluminium windows and the roof appears to have been renewed.

- The internal layout remains largely unchanged from the original layout, despite the conversion to multiple units in the early 1960's. The removal of some partitions has restored the original proportions to principal rooms.
- The stair remains in good condition throughout, including associated plasterwork and detailing. The cornicing to the entrance hall is in particularly good condition.
- While the original window surrounds and a fireplace remain at lower ground floor, the architectural expression is otherwise modest at this level.
- The interior details are largely intact at upper ground floor level, including ceiling roses, cornicing, window boxes, architraves and the entablature/doors between the two principal reception rooms.
- Window surrounds have largely been removed at first floor level. No original doors remain, and two walls have been partially removed.
- The NIAH regards the terrace as being of 'Regional' significance and highlights the elegant elevation and grand scale of the terrace.

7.5.2 The report assesses the impact of the proposed works as follows:

- The removal of the non-original partitions will significantly aid the legibility of the original proportions and detailing, including fine cornicing.
- The revised layout will avoid the use of fire lobbies and improve daylight.
- Heating and plumbing services will be carefully removed and reorganised to eliminate unsightly services and protect the historic fabric.
- En-suite and kitchenette facilities will be accommodated within narrow panelled spaces along the walls to the height of the architraves (c. 2.5m).
- The strategy maintains the original room proportions and ceiling features.
- Existing windows will be replaced with timber sash windows and external vents and pipework will be reorganised and replaced.
- All non-original floor tiles will be removed, and the existing floorboards will be reused, cleaned and sealed.
- The non-original doors will be replaced with 4-panelled painted timber doors.

- The revised drainage strategy will remove one internal and two external waste pipes. The kitchenette and ensuite enclosures avoid the need for electrical services within the existing walls.
- Radiators will be located in a way to minimise visual impact.
- The proposed fire-proofing works to the doors and floors are acknowledged.
- The report concludes that the works will have minimal impact on the existing fabric; will be reversible in nature; will be completed to the highest standard; and will enable the use of the building as living accommodation in accordance with modern standards while preserving its special character.

7.5.3 In contrast, the reports of the planning authority outline a general objection to the principle of the ongoing use of the building for anything more than three units. However, having regard to the long-standing use of the building as ten separate units, I do not consider this to be a reasonable approach. As previously outlined, the application to reconfigure and refurbish the existing units should be considered on its merits, with particular regard to the impact on architectural heritage.

7.5.4 In terms of the conservation impact, the planning authority does not detail any specific impacts of concern regarding the historic fabric. Instead there is a general concern about the impacts of 'intensification' and installation of services. Again, I consider that the proposed reduction from ten to nine units cannot be considered 'intensification' and that the impacts of services installation should be considered in the context of the existing situation.

7.5.5 With reference to the principles outlined in the 'Architectural Heritage Protection' guidelines, I consider that the primary conservation importance is keeping the building in use while protecting its special architectural importance. To do so, I acknowledge that the applicant has researched the history of the building and employed expert conservation advice services.

7.5.6 I would agree with the applicant's assessment of the existing building in that the historic interior fabric of special interest is largely limited to the ceiling plasterwork, the stairs and the window / door surrounds. I also agree that the removal of the non-original partition walls and services would have a positive impact on the legibility and character of the building.

- 7.5.7 Subsequent to that, the most significant interventions in each room would be the installation of the kitchenette / bathroom units. As outlined in the application, these would be lightweight installations that would be separate from the existing walls and would be sized and located in a manner that avoids interference with the existing ceilings and window surrounds etc.
- 7.5.8 In terms of building services I consider that the removal of the existing drainage and venting facilities will have a positive impact. The installation of new services has been designed to protect the historic fabric of the building. I note that, for example, a soil vent pipe will be accommodated in an existing flue, and the electrical services for the new kitchen / bathroom installations will not affect the existing walls. The proposed replacement of the non-original vents with new cast iron vents would also have a positive impact.
- 7.5.9 The proposal involves a range of other interior improvements including the repair and re-use of existing floorboards and window surrounds, as well as the installation of new doors. Externally, I consider that the replacement of the existing windows with one-over-one timber sash windows will be a significant improvement to the presentation of the building.
- 7.5.10 Overall I consider the proposal adopts a minimum intervention approach towards an enhanced function of the building, whilst ensuring the protection of its historic fabric. The design incorporates appropriate methods and materials for the upgrading of the building to comply with modern building standards, all of which would be appropriately reversible in the future. Accordingly, I consider that the development would be consistent with the conservation principles outlined in the 'Architectural Heritage Protection' guidelines and I would have no objection in this regard.

## 7.6 Other issues

- 7.6.1 Having regard to the established use of the property, and the proposal to reduce the number of units therein, I do not consider that the proposal will have any implications in relation to traffic and transport facilities.
- 7.6.2 It is proposed to connect to the existing water and wastewater services on site. The footprint of development on the site will not be altered and, accordingly, there will be no impact in terms of surface water collection and disposal.

## 7.7 Conclusion

7.7.1 In conclusion, I consider that the application should be considered simply as a proposal to refurbish and improve the existing multi-unit residential property. While aspirations for the further amalgamation of the property towards its original single-family use are worthy, I consider that the current proposal would result in significant improvements in terms of residential amenity and architectural heritage and would help to secure the immediate protection of the property. The proposed interventions are easily reversible in the event that the restoration of the building to its original character and use is proposed in the future.

7.7.2 The references to the potential use of the building for emergency homeless accommodation are noted. However, this change of use should not be considered part of the current application. The suitability of the development for any such use would have to be assessed as part of a separate application for a change of use and this should be clarified by means of a condition in the event of granting permission.

## 8.0 Appropriate Assessment

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

## 9.0 Recommendation

I recommend that permission should be **granted**, subject to conditions, for the reasons and considerations as set out below.

## 10.0 Reasons and Considerations

Having regard to the established use and condition of the property; the design, nature and scale of the proposed development and the pattern and character of development in the vicinity; and to the policies of the Dublin City Development Plan 2016 – 2022, as well as national guidance including the '*Architectural Heritage*



*Protection Guidelines for Planning Authorities'* (2011), and *'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities'* (2018); it is considered that, subject to compliance with the conditions set out below, the proposed development would not have a significant adverse effect on the character of this protected structure, would not detract from the character of the area, would provide an acceptable level of residential amenity for the future occupants and would not seriously injure the amenities of adjacent residential property, would not be prejudicial to public and environmental health and would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

## 11.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

**Reason:** In the interest of clarity.

2. This permission does not authorise a material change of use of the property. No material change of use, including use as emergency homeless accommodation, shall be effected unless otherwise authorised by a prior grant of permission.

**Reason:** In the interest of clarity.

3. Water supply and drainage requirements, including surface water collection and disposal, shall comply with the requirements of the planning authority for such works and services.

**Reason:** In the interest of public health and to ensure a proper standard of development.

4. Site development and building works shall be carried out only between the hours of 0800 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays or public holidays. Deviation from these times shall only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

**Reason:** In order to safeguard the residential amenities of property in the vicinity.

5. The construction of the development shall be managed in accordance with a Construction Management Plan which shall be submitted to, and agreed in writing with, the planning authority prior to the commencement of development. This plan shall provide details of intended construction practice for the development, including noise management measures and off-site disposal of construction/demolition waste.

**Reason:** In the interests of public safety and residential amenity.

6. (a) A conservation expert shall be employed to manage, monitor and implement the works on the site and to ensure adequate protection of the retained and historic fabric during the works. In this regard, all permitted works shall be designed to cause minimum interference to the retained building and facades structure and/or fabric;
- (b) All repair works to the protected structure shall be carried out in accordance with best conservation practice as detailed in the application and the Architectural Heritage Protection Guidelines for Planning Authorities issued by the Department of Arts, Heritage and the Gaeltacht in 2011. The repair works shall retain the maximum amount of surviving historic fabric in situ, including structural elements, plasterwork (plain and decorative) and

joinery and shall be designed to cause minimum interference to the building structure and/or fabric. Items that must be removed for repair shall be recorded prior to removal, catalogued and numbered to allow for authentic reinstatement;

(c) All existing original features, including interior and exterior fittings/features, joinery, plasterwork, features (including cornices and ceiling mouldings) staircases including balusters, handrail and skirting boards, shall be protected during the course of refurbishment;

(d) The installation of alarms, as well as any other security or communication devices, shall be designed to protect the architectural integrity of the building;

(e) Prior to the commencement of development, details of the procedures to be followed in respect of the above, including proposals with respect to work methodologies, services installation, doors, floors, ceilings and windows shall be submitted to, and agreed in writing with, the planning authority.

**Reason:** To ensure that the integrity of the protected structure is maintained and that the structure is protected from unnecessary damage or loss of fabric.

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Stephen Ward  
Senior Planning Inspector

15th December 2020